Utilizing the NEPA Process for Environmental Remediation Work
Case Study: United States Coast Guard Passage Island Light Station, Michigan

By

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Abstract

The capstone paper shall discuss in detail the case study in question, and examine how the National Environmental Policy Act (NEPA) process can be utilized to resolve conflicting interests and regulatory requirements for a proposed remediation project to clean up high levels of metals contamination in soil. The NEPA process provides a systematic approach to analyze and weigh competing interests in meeting State and Environmental Protection Agency (EPA) cleanup requirements for soil, while preserving the natural environment, salvaging rare plants, not introducing invasive species, and preserving the cultural landscape and Section 106 historic preservation requirements for this historic site, which is listed on the National Register.
At times environmental remediation work must be conducted in order to address soil or groundwater contamination and clean it up to the applicable regulatory standards deemed to apply to the contaminants of concern present at the specific location. Environmental remediation might be perceived as seemingly outside of other environmental protection regulations that might otherwise apply, for the simple fact that the environmental remediation project has been initiated in order to correct a contamination problem at hand, and restore the environment at the site to its undamaged state. Although this may seem like an obvious effort to correct a past wrong and ultimately protect the environment, the inherent complexity of ecosystems, cultural resources, and regulatory requirements may pose conflicting, and at times mutually exclusive, environmental components to this effort. The National Environmental Policy Act process can serve as an effective tool to organize and detail for consideration pertinent environmental stipulations, and better enable a federal agency to make the most informed, mutually agreeable decision when the course of action poses several challenges to competing initiatives and interested parties. The case study used to emphasize this point is the United States Coast Guard (USCG) Passage Island Light Station, located on Passage Island in northern Lake Superior, within the limits of Isle Royale National Park.
A background of the case study site in question is needed in order to better understand its complexity and applicability as an example of using the NEPA process to negotiate a solution to a challenging set of preservation priorities. Passage Island Light Station is a 6.3 acre USCG facility established in 1882 on the southern tip of Passage Island, which is located off the northern tip of Isle Royale in northern Lake Superior. According to an article written by Don Nelson and printed in the October 2001 edition of “Lighthouse Digest Magazine,” the lighthouse and fog signal building were constructed to aid maritime navigation by marking the narrow channel between Passage Island and Blake Point for vessels traveling from Thunder Bay, Canada to Sault Sainte Marie, Michigan. “Threading the needle” through this three-mile wide passage shortened the trip between these two ports by fifty miles, and allowed vessels to avoid the dangerous chain of Gull Islands and reefs stretching to the northeast. However, Canadian vessels were mainly to benefit from the difficult process of constructing and manning this light station on such a remote island in northern Lake Superior. The United States and Canadian governments negotiated a mutually beneficial agreement to each build and man lighthouses on their own soil that would mainly benefit the other country. Passage Island Light Station was to benefit primarily Canadian freighters headed for Soo locks, while the Canadian government built a lighthouse at Colchester Reef on the Canadian side near the entrance to the Detroit River on Lake Erie, which would largely benefit American vessel traffic. Besides being the second most northern lighthouse in the continental United States, Passage Island Light Station was constructed via a unique agreement with the Canadian government to aid maritime navigation for both Canada and the United States.

The Passage Island Light Station was manned full time by lighthouse keepers and their families until December 1978, when it was automated. The historic fourth order Fresnel lens, which served as the optic for the light, was removed in 1989 and has been placed on display at the Coast Guard Station in Dollar Bay, Michigan. A solar powered modern optic replaced the Fresnel lens, which along with the modern electric fog signal horn, still serves as an active aid to navigation today. However, there has not been human habitation on Passage Island since it was automated in 1978, which has allowed the island to partially return to its natural state. The Light Station consists of a lighthouse and attached keeper’s quarters, fog signal building, oil house, dock, tramway, turntable, winch house, privy, and helicopter landing pad. The U.S. Coast Guard
maintains the optic in the lighthouse in order to keep this active aid to navigation in service, however, the funding and expertise required to maintain all of the historic structures at Passage Island is beyond that allocated by Congress to the Coast Guard for environmental remediation projects. Although it is required for Federal agencies to maintain historic structures within a comprehensive historic preservation program per Section 110 of the National Historic Preservation Act, demand for such funds in the USCG far exceed available funding. Due to the government’s response to the 11 September 2001 terrorist attacks and the move of the USCG to the newly created Department of Homeland Security, the Coast Guard has expanded their responsibilities widely, yet not had significant increases in funding or personnel. Additionally, the Federal government’s push to tighten operational budgets, decrease their footprint and close Department of Defense sites, and divest excess property within an agency has also been embraced by the USCG in order to make up for budget deficits and meet audit requirements. Properties excess to the needs of the Coast Guard are rapidly being transferred out of the Coast Guard’s inventory following the appropriate environmental due diligence assessments and clean ups, where required. Lighthouses, Light Stations, and Life Savings Stations throughout the Great Lakes and both coasts are among the first up for divestiture because they are no longer actively manned stations. Often the optic remains active within the lighthouse, but is automated and only requires periodic maintenance by the local servicing USCG Unit. The lighthouse structure itself and associated outbuildings are not necessarily required for operations, and represent a large maintenance burden since most are over a century old, require significant coordination with State Historic Preservation Officers in order to coordinate repairs and maintenance, and require significant cost in order to repair and maintain the structure while meeting the Secretary of Interior’s preservation requirements for historic structures. Lighthouses are somewhat romanticized in our culture as well; many small communities identify the character of their hometown by the historic lighthouse that marks their location along the shore—especially in the Great Lakes areas. Because lighthouses are highly regarded and serve as focal points for a community, often the local government will make great efforts in order to ensure their lighthouse is preserved and restored, in an effort to foster tourism in the area. This is especially pertinent in today’s economic reality in the rust belt States, where many communities are economically depressed and looking for a solution outside of the once heavy manufacturing
and mining industries. The heavy community interest in lighthouses coupled with the USCG’s need to divest of these historic structures can often forge property transfers of the historic lighthouses into the hands of local communities and non-profit organizations that can better focus on the restoration work and fundraising required to keep the structures in good working order. Time is also an essential component here, so there is a push to clean up and divest of historic light station properties, like Passage Island, and get them into the hands of caretakers better prepared to maintain the structures before the structures are compromised further, due to often being at least 100 years old or more and exposed to the harshest of weather conditions year round. So as the Section 110 requirement goes unmet for the USCG and the structures continue to crumble due to lack of available funds to maintain them, at the same time agencies, communities and non-profits that might be better funded and prepared to take on these challenges are hesitant to expend the funds on structures that they do not technically own—and rightfully so. Yet, these historic sites cannot be transferred out of the Federal inventory without first conducting the required environmental investigations and clean up activities. It is in the Coast Guard’s as well as the property recipient’s best interests to conduct the required environmental investigations and clean ups expeditiously in order to enable timely transfer of these historic properties before the structures become unsalvageable.

In the case of Passage Island Light Station, the island itself has been under the custody and control of the USCG for over one hundred years, yet the island now falls within the borders of Isle Royale National Park, which is maintained by the National Park Service (NPS). Due to their authority in maintaining their park lands, the NPS has the right of first refusal for USCG lands up for divestiture within the boundaries of Isle Royale National Park. Passage Island is one of three such properties within this Park, and NPS has stated that their agency has full intentions of acquiring all three USCG properties upon their divestiture. Like any conscientious individual acquiring property, NPS wants to accept little to no risk for the acquisition in the way of environmental contamination as a result of past USCG activities on the site. Even though clean up of property is not required in order to transfer property between Federal agencies, since overall the Federal government is still ultimately responsible, the NPS has taken a hard line stance that they will not acquire a property with any associated environmental liability. Thus,
the USCG agreed to perform an environmental investigation and clean up of the Light Station prior to divestiture.

Since Passage Island was established in 1882, and because it is such a remote, desolate area, light keepers often found keeping busy to be the best recourse to avoid boredom. The result was meticulously maintained ground and structures—no doubt part of the reason that remote historic light stations have weathered the test of time so well. Part of this nonstop maintenance included lots of painting with industrial grade lead-based paints. The geology at work on islands within northern Lake Superior resulted in pockets of thin veneers of glacially deposited soils and shallow bedrock outcrops. Due to years of repeatedly painting exterior structures and flaking of lead-based paint off exterior structures, the concentration of lead-based paint flaking off into minimal amounts of soil present throughout the areas around site structures at Passage Island resulted in extremely high lead contamination levels in the soil, as evidenced by soil sampling data. Generally speaking, lead contamination in soil often does not pose a threat to groundwater or surface water resources because lead is a very stable element that does not readily leach to groundwater. Because the lead levels are so high in the soil at Passage Island, the waste characterization tests that were performed in order to determine how to dispose of the contaminated soil at the site came back stating that the soil must be disposed of as a hazardous material, due to the leachability of the high lead levels present.

Following the USCG’s assessment and quantification of the contamination present on site, the property acquisition side of the NPS required the USCG to perform a clean up at Passage Island Light Station that would reduce lead levels at the site to below that which is required for residential use, which is also referred to as unrestricted use. The Michigan Department of Environmental Quality (MDEQ) also required the USCG to perform a soil clean up at the site that would meet residential criteria. However, in order to meet lead in soil criteria that low, a removal of virtually all soil around the structures at Passage Island Light Station would be required. Initially, MDEQ and NPS refused to factor future site use into the determination of appropriate clean up criteria. Due to the fact that Passage Island Light Station is listed on the National Register of Historic Places, the National Historic Lighthouse Preservation Act (NHLPA) has built-in protections to the law that prevent future uses that might compromise its historicity, in addition to provisions to further preservation efforts of these
structures by divesting them to organizations that are better able to care for them and allow the public to enjoy them as well. For example, the Light Station would never be permitted to be used as a commercial facility or a residence. A hotel or any non-historic structure would not be permitted to be built on the Light Station grounds. The intent of such laws is to preserve the historic integrity of the place, as well as keep the site within the reach of the public, and for public use, not private gain. These NHLPA site use restrictions are in addition to the inherent use restrictions of the island itself. Isle Royale National Park is the least visited National Park in the United States, no doubt due to these same geographic site access difficulties. Passage Island and Isle Royale National Park lie in the northern reaches of Lake Superior, near the Canadian border. The area can only be accessed by boat, either a six-hour ferry ride from Houghton, Michigan—a remote area of the upper peninsula of Michigan, or a two-hour ferry ride from Grand Portage, Minnesota—in the northernmost corner of Minnesota on the Canadian border. Ferries only run regularly in the summer season—June through August—and can only get a visitor to the main National Park headquarters area. A private charter boat or a NPS tour is required in order to get to Passage Island from the Park headquarters area. The waters of Lake Superior are deep, frigid, and treacherous when storms quickly arise, so trespassing boaters are very unlikely. Getting to Passage Island outside of June through July is nearly impossible, simply due to the weather. Regardless of all of the site use restrictions—both natural and imposed by regulations—when initially discussing the required clean up on Passage Island, both MDEQ and the property acquisition department of NPS took a hard line and insisted that the USCG clean the site up to residential unrestricted use.

USCG then pursued regulatory negotiations with the Environmental Protection Agency (EPA), since MDEQ would not consider a risk-based clean up approach. A risk-based clean up approach would allow USCG to leave a greater amount of soil in excess of residential clean up criteria in place at Passage Island. This approach is substantiated by performing calculations of risk based on site specific human and ecological exposure criteria. In this way, USCG was able to negotiate higher lead criteria, about twelve times higher than residential, and disturb less of the island by leaving more soil in place. This approach seemed to satisfy all parties—NPS would have less rare plant and glacially deposited soil loss, NPS and SHPO would see less effect on cultural landscape, USCG would be able to perform a more cost effective, fiscally responsible
clean up better suited for the actual site risks at hand, and regulatory requirements for protection of human health and the environmental would still be met. However, further complications persisted.

The Natural Resources arm of the National Park Service immediately took issue with any soil removal on the Light Station site due to the unique natural ecosystem present. The minimal amounts of soil present at Passage Island have been glacially deposited and formed over hundreds of thousands of years of weathering rock. NPS considered every square inch of soil on Passage Island, to be a significant part of its ecosystem. Passage Island Light Station lies within Isle Royale National Park, which in 1981 was designated as a United Nations Biosphere Reserve. According to the UNESCO web site, to be designated a Biosphere Reserve is a special honor; only 247 sites worldwide have this distinction, which indicates global scientific and educational significance. And unlike the larger Isle Royale Island, Passage Island does not support a moose population; this allows the subarctic vegetation to thrive and exist undisturbed from browsing moose. As a result, rare animals like the boreal chorus frog and plants such as saxifraga tricuspidata and the small flowered wood rush have colonized on Passage Island, overcoming long, harsh winters and minimal amounts of soil. Saxifraga tricuspidata is a rock-breaking plant, that slowly breaks up rock over time and helps to form soil. This particular plant species lies within the footprint of the soil contamination at Passage Island Light Station. This plant is not Federally protected, so the Fish and Wildlife Service took no issue with potential removal of plant species from the area during a remediation effort. However, the NPS and Michigan Department of Natural Resources took exception to the fact that some specimens of this plant would have to be destroyed during the cleanup, as simply moving the plants to another non-contaminated area would spread lead contamination. In fact, the only area in all of Michigan where this plant has been observed is the Keweenaw peninsula and Isle Royale islands. The Michigan Natural Features Inventory lists conservation practices for saxifraga tricuspidata sightings on Passage Island and most include reducing human disturbance, development, and foot traffic in the colonizing areas of the plant, which is obviously a conflict when considering a soil removal effort on the island. NPS requested that USCG get a take permit from the Michigan Department of Natural Resources (MDNR) for the estimated number of plants within the contamination footprint that would need to be disposed of offsite due to lead uptake. MDNR at
first would not grant USCG a take permit, because the only acceptable reason for getting one was for research purposes. After much negotiation, MDNR agreed to issue the take permit to USCG, but it was only valid for one season—so if work was delayed beyond the three month window for a given year, the USCG would need to re-apply for another MDNR take permit.

As with any federally funded project that could potentially affect historic resources, the USCG must fulfill Section 106 project review requirements with the Michigan SHPO prior to conducting clean up work at Passage Island. USCG coordinated with SHPO and agreed to conduct a cultural resources survey on the island prior to any soil removal work. The cultural resources survey was an extensive desktop study of light station history, Passage Island historic structures, historic and prehistoric history at the site, as well as on site survey digging test pits and sifting for archaeological resources that might be present in areas around the structures, which were proposed for clean up and soil removal. Due to minimal soils and shallow bedrock present on the island, no significant archaeological resources were encountered during the study. Additionally, USCG determined that the soil clean up work would not affect the historic structures on site, as minimal amounts of soil were present to begin with and proper drainage and site grading would be achieved following soil removal to ensure structural integrity of the buildings following the cleanup. According to USCG records, when the Light Station was originally constructed the foundations for the structures on Passage Island had to be blasted using explosives in order to recess them into the bedrock at the southwest end of the island. Therefore soil removal around the light station was not expected to adversely affect the historic structures.

Typically, when soil is removed due to contamination issues, a site is restored in-kind using native fill material, proper grading and compaction, and then seeding with native grass seed. This standard method of restoration was initially proposed to the Isle Royale National Park for Passage Island following the soil clean up, in an attempt to leave the site looking as much like it did prior to the cleanup as possible. The National Park Service hit a roadblock with this issue. Native fill to be used as replacement material for the soil voids left on Passage Island was simply not available. All areas where native fill could be obtained were also within the Isle Royale island archipelago, and were also protected from disturbance. The USCG pursued obtaining native fill from other areas near the site in Keweenaw County and in northern Minnesota. However, NPS believed that fill material from any other region besides the Isle
Royale National Park posed a serious invasive species threat to the pristine environment on Passage Island. Invasive species can include plant, insect, animal, mold spores, etc. present in fill material that can take root and thrive in non-native environments. This can be devastating to native species as they can get crowded out or preyed upon until populations dwindle and become extinct. NPS therefore requested USCG come up with another option.

USCG proposed using sterilized soil as replacement material for the contaminated soil proposed for removal from Passage Island. Sterilized soil is actually heat treated to kill 99.9% of any species present; it is extremely expensive and not easily available. The closest source of sterilized soil of similar composition to that of Passage Island was found in California, and would need to be transported by rail car and truck thousands of miles, and then by freighter or ferry over Lake Superior to Passage Island. NPS considered this alternative; however, the Natural Resources arm of NPS still refused to import any soil onto the island, stating that the 0.1% risk of invasive species present in sterilized soil was too big of a risk to take. USCG and NPS then agreed to not replace any soil on Passage Island at all to alleviate this risk. USCG went back to SHPO to propose the soil cleanup effort and the newly agreed upon plan to not restore the site with soil fill to avoid any impacts from invasive species. SHPO agreed that this was acceptable, as they defer to the National Park Service on matters affecting National Park resources. SHPO therefore agreed that no adverse effects to historic structures or archaeological resources would be generated, and issued the USCG a letter of concurrence stating no adverse effect was anticipated due to the planned soil remediation work.

With the Section 106 concurrence letter in hand, USCG moved forward with the planned clean up effort. Several in person and teleconference meetings were held between USCG and NPS to facilitate the preparation for cleanup, and ensure all parties were on board. During one of the meetings, NPS questioned USCG’s application of a Categorical Exclusion determination to fulfill the NEPA requirement for the site work, and mentioned that an Environmental Assessment would be more appropriate. However, due to the push to get the work done in the three month season out on the island, the limited available technology to do the work since lead in soil contamination is persistent and minimal impact on the natural environment was essential, and the fact that, at the time, it seemed all interested parties were in agreement with the plan of action going forward, USCG planned to forge ahead with the cleanup.
Perhaps as a way to bring the cleanup to a halt, interested citizens and NPS petitioned SHPO to rescind the no effects determination on the soil cleanup at Passage Island due to potential impacts to cultural landscape, which might be significant and present at the Light Station. SHPO rescinded their no effects determination to USCG and effectively halted the cleanup for several more years while more information was gathered. Until this time, cultural landscape was never discussed by NPS cultural resources staff or in the cultural resources survey conducted by USCG contract. According to Preservation Brief 36 by the National Park Service, a cultural landscape can be a historic site, historic designed landscape, historic vernacular landscape, or ethnographic landscape. A cultural landscape by definition is a geographic area, including both cultural and natural resources and wildlife, associated with a historic event, activity, or person, or one that exhibits other cultural or aesthetic values. Concerned citizens and

![Passage Island Light Station, Photo Courtesy of U.S. Coast Guard Archives](image)
NPS Cultural resources staff wanted USCG to evaluate the significance of cultural landscape at the site, especially since no soil replacement was planned after soil removal due to invasive species concerns.

In response to the concern over cultural landscapes, the National Park Service then revised a 1999 Draft Cultural Resources Inventory for Passage Island Light Station, and concluded that due to Passage Island’s distinct association with the navigation and maritime history of the region, its primary significance lies in its cultural contributions. Isle Royale and the other islands in the park share the same geophysical setting and early history as fishing communities, but Passage Island stood out in that it served as the prominent aid to navigation along the northern stretch of Lake Superior. Around the same time period, the USCG nominated Passage Island Light for the National Register of Historic Places. Due to the recent interest in cultural landscapes, the USCG invested significant research in the nomination form to outline areas of cultural landscape associated with the Light Station. The USCG’s Continuation Sheet to the National Register Nomination Form discusses the site’s cultural landscape in much greater detail. The significant periods of cultural landscape include the Light’s construction from 1881 to 1882 and the Light Station’s operational and fully manned period between 1882 and 1978. The Light Station was also divided into three functional landform zones, each with their own respective cultural landscape features. The shoreline zone features include those adjacent to the water in the exposed flat rock area and sloped rock up leading up to the main lighthouse area, including the concrete pier, pump house, sump house (now in ruins), tramway, and walkway complex to the fog signal building. The terrace zone is the main operational area of the Light Station, which is relatively flat with shallow soil deposits and bedrock outcrops, and includes the lighthouse, fog signal building, storage building, privy, winch house, walkways, and tramway turntable. The upland landform zone lies further up the island and contains the helipad and three concrete supports that once supported an antenna tower. The upland zone has more soil outcrops and deeper deposits of soil, therefore, it is believed that garden areas and refuse disposal areas were most likely located in the upland zone. The terraced zone simply does not have enough unoccupied space by buildings and structures to support such uses. The terraced zone, which is primarily the area around the main site structures, is also the area with the greatest amount of lead in soil contamination. The USCG maintained that the required lead in soil cleanup, without
any clean soil restoration effort, would not adversely impact the cultural landscape or historic structures at Passage Island Light Station.

For several years the National Park Service was at an impasse; the cultural resources branch insisted that soil should be replaced around the Light Station following the clean up effort in order to mitigate impacts to the cultural landscape and preserve the historic look and feel of an active USCG Station, as it might have looked from 1882-1978. The natural resources branch at NPS disagreed. Although they deferred to the cultural resources branch on the significance of the cultural landscape present at the site, they insisted that the potential hazards of introducing invasive species through importing clean soil fill was too much of a risk to the natural ecosystem on Passage Island. SHPO would not intervene on this issue, as they defer to the National Park Service on historic matters, most especially those occurring in a National Park.

Following contracted discussions between USCG and NPS, it was decided that an Environmental Assessment would be required in order to fully examine remediation alternatives and potential effects of such on site resources. In retrospect, the USCG should have first begun the entire process of assessment and clean up with the appropriate NEPA work. At the time, due the time critical nature of getting the site cleaned up and transferred and the apparent agreement of the USCG and NPS on the means of doing so, it was believed that this effort could be categorically excluded under the USCG NEPA policy manual for environmental studies and site restoration work, along with the appropriate SHPO consultations. The complexity of the issues at hand, however, was not apparent until the assessment to support the clean up work and historic documentation began.

To date, USCG attempted to negotiate and meet the requirements of every interested party in this clean up effort at Passage Island, but a comprehensive blanketing approach to look at all issues collectively was missing. Doing an EA or an Environmental Impact Statement up front, although initially a substantial time investment, would have brought all of the site complexities and coordinating agency’s contradicting goals forward in the beginning, and would have allowed for a more collaborative approach to finding an appropriate remediation solution at such a sensitive place.

The beauty of the National Environmental Policy Act (NEPA) lies in its comprehensive, broad-sweeping approach to require procedural consideration of environmental effects as an
inherent part of any federally funded project. NEPA provides a systematic process in which the contributing environmental components of a project are examined individually and collectively and presented to the decision maker, cooperating agencies, and the public for consideration, prior to implementation of the project. Among all laws governing Federal actions, NEPA is the first and only regulatory requirement that requires the agency to take a hard look at a proposed action in the comprehensive context of multiple environmental protection statutes, including cultural resources, natural resources, endangered species, habitat preservation, historic preservation, and impacts to humans and socioeconomics. Other applicable regulations tend to concern one specific aspect of environmental protection, considered solely on its own merit, and alternatives weighed and weighted independently of its effects on other issues of environmental concern. For example, the Michigan Department of Environmental Quality as an agency has a primary goal of ensuring that contaminant levels in soil do not exceed the Department’s standards for that contaminant, as promulgated in their regulations. The Michigan State Historic Preservation Officer (SHPO)’s primary objective is to ensure the Federal proponent protects historic resources in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966; NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and prevent or mitigate any adverse effects. The Endangered Species Act and the Michigan Department of Natural Resources seek to protect threatened and endangered species to the country and State, respectively. Although each of these policies applies to environmental remediation at this particular site on Passage Island, a scientifically sound decision, protective of the natural and cultural resources present on site, is not possible when considering each of these policies independently. NEPA provides the procedural framework to outline, define, and break down these seemingly conflicting statutes in order to find a mutually beneficial solution that can potentially garner cooperating agency support and public buy in.

This case study of Passage Island furthers the point made by Bartlett in his piece entitled “Rationality and the Logic of NEPA,” in that NEPA has not received enough credit for its ability to force Federal agencies into using scientific analysis as a basis for logical and ecologically responsible decision making. The NEPA process can often be considered to be an unnecessary part of decision making and is performed to simply satisfy a procedural requirement, which may offer little to the outcome but may necessitate a significant investment of time and funding.
However, the experience detailed here with Passage Island illustrates that trying to vet project requirements and make decisions with multiple and competing organizations and interests outside of the NEPA process can often result in significant delays, getting blindsided by issues previously unconsidered, potential litigation, and dollars spent unnecessarily. Additionally, the Council on Environmental Quality’s Collaboration in NEPA Handbook, clearly emphasizes that one of the primary goals of the NEPA process is to encourage public dialogue and input into the project and meaningful evaluation of environmental impacts associated with the proposed Federal action. Using such a collaborative approach to engage the public and fully assess the interrelated impacts of the proposed action improves the quality and efficiency of decision making and fosters public trust and confidence in USCG decisions.
References


