FINAL

ENVIRONMENTAL ASSESSMENT FOR BRAC 05 RECOMMENDATIONS FOR CLOSURE, DISPOSAL, AND REUSE OF THE SSG ROY CLIFTON SCOUTEN UNITED STATES ARMY RESERVE CENTER MANSFIELD, OHIO FAC ID OH037

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December 2011

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DRAFT FINDING OF NO SIGNIFICANT IMPACT

ENVIRONMENTAL ASSESSMENT FOR BRAC 05 RECOMMENDATIONS FOR CLOSURE, DISPOSAL, AND REUSE OF THE SSG ROY CLIFTON SCOUTEN UNITED STATES ARMY RESERVE CENTER, MANSFIELD, OHIO FAC ID OH037

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission recommended that the Department of Defense (DoD) close the Scouten US Army Reserve Center (USARC or the Property) in Mansfield, Ohio; and relocate all units to a new AFRC at Mansfield Air National Guard Base located at Mansfield-Lahm Airport.

Pursuant to the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and 32 CFR 651 (Environmental Analysis of Army Actions), the US Army Corps of Engineers, Mobile District has prepared an Environmental Assessment (EA) of the potential environmental and socioeconomic effects associated with the closure, disposal, and reuse of the Scouten USARC.

PROPOSED ACTION

The proposed action is the closure, disposal, and reuse of the Scouten USARC. Reuse of the surplus property made available by the closure of the Scouten USARC would occur as a secondary action resulting from disposal. Environmental effects associated with the transfer of personnel to the new AFRC and actions related to this transfer have been evaluated under NEPA in a separate EA (Ohio Air National Guard 2008).

The Scouten USARC, located at 271 Hedges Street, Mansfield, Richland County, Ohio, was built in 1958. This site consists of 4 acres of developed land with the following structures:

- Administration Building; 11,759 square feet
- Organizational Maintenance Shop (OMS); 2,858 square feet

ALTERNATIVES CONSIDERED

Alternative 1 – No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Scouten USARC at levels similar to those that occurred prior to the BRAC 2005 Commission's recommendations for closure becoming final. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated. The Reserve mission at the USARC has ended and it is unlikely that it would ever resume, given the recommendation of the BRAC Commission. Nevertheless, this No Action Alternative allows comparison of impacts between

the prior mission, the current caretaker status, and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

Impacts of Army Closure, Disposal, and Reuse

The EA also reviews the potential impacts of two implementation alternatives. These alternatives are:

Alternative 2 – Caretaker Status Alternative; and

Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center

Alternative 2 – Caretaker Status Alternative

The Army secured the Scouten USARC after the military mission ended on September 12, 2011 to ensure public safety and the security of remaining government property. From the time of operational closure until conveyance of the Property, the Army will provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the Scouten USARC is not transferred, the Army will reduce maintenance levels to the minimum level for surplus government property as specified in 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-1 (Army Facilities Management).

Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center

For the Preferred Alternative the Army would dispose of the Scouten USARC under a public benefit conveyance to the Mary McLeod-Bethune Intervention and Enrichment Center for use as independent living accommodations and supportive services for homeless seniors as recommended by the City of Mansfield LRA in the SSG Roy Clifton Scouten USARC Reuse Plan. The Center would support nine full-time employees and two part-time employees, including an executive director, clerical, nurses, cook, and maintenance staff.

The administration building would be renovated to fit the purposes of the homeless housing center and the other buildings would be used for storage of equipment associated with the program. The planned renovation would create efficiency permanent housing for up to 24 homeless seniors with supportive services such as: respite care; physical therapy; medication assistance; wellness programs; transportation; recreation; and in-suite emergency response. In addition to permanent housing, the Center would also provide an emergency shelter program. The emergency shelter program would provide assistance to individuals who are homeless or in need of emergency shelter due to domestic violence or other such crisis. The emergency shelter program would initially consist of financial assistance for short-term housing, transportation, counseling, childcare, case management, employment counseling, and other assistance.

Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and because there was a final reuse plan on which to base the NEPA analysis.

FACTORS CONSIDERED IN DETERMINING THAT NO ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED

The EA, which is incorporated by reference into this Finding of No Significant Impact (FNSI), examined potential effects of the implementing the proposed action on 12 resource areas for each alternative: aesthetics and visual resources, air quality, biological resources, cultural resources, geology and soils, hazardous materials, land use, noise, socioeconomics, transportation, utilities, and water resources. The analyses in the EA concluded that there will be no significant adverse or significant beneficial environmental impacts resulting from implementing the proposed action.

As a result, no mitigation measures are required as part of this EA.

CONCLUSION

Based upon the EA, it has been determined that implementation of any of the alternatives will not result in a significant impact on the quality of the human or natural environment. The Army is committed to implementing the Best Management Practices described in the EA. Therefore, issuance of a FNSI is warranted, and preparation of an Environmental Impact Statement (EIS) is not required and an EIS will not be prepared.

It has also been determined that the No Action Alternative will not support Congressional requirements under BRAC law (Public Laws 101-510); consequently, it has not been selected for implementation. Alternative 3 is the preferred alternative of the Army and the LRA. This alternative would include the reuse of the facility as independent living accommodations for the homeless by the Mary McLeod-Bethune Intervention and Enrichment Center.

PUBLIC AVAILABILITY

The EA and Draft Finding of No Significant Impact (FNSI) have undergone a 30-day public comment period in accordance with requirements specified in 32 CFR Part 651.

The 30-day public review period was initiated by placing a Notice of Availability of the final EA and Draft FNSI in the *Mansfield News Journal*, and the *Cleveland Plain Dealer*. The EA and Draft FNSI were available at the Mansfield/Richland County Public Libraries of Main Library (43 West Third Street, Mansfield, OH 44902) and Crestview Branch (1575 SR 96 East, Ashland, OH 44805); and on the BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

Date

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Director, Public Works
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ENVIRONMENTAL ASSESSMENT

FOR BRAC 05 RECOMMENDATIONS FOR CLOSURE, DISPOSAL, AND REUSE OF THE SSG ROY CLIFTON SCOUTEN UNITED STATES ARMY RESERVE CENTER, MANSFIELD, OHIO FAC ID OH037

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EXECUTIVE SUMMARY

ES 1 INTRODUCTION

This Environmental Assessment (EA) analyzes the environmental impacts of the proposed closure, disposal, and reuse of the SSG Roy Clifton Scouten United States Army Reserve Center (USARC), Mansfield, Ohio. This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) [42 United States Code (U.S.C.) § 4321 et seq.]; implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions,* 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

This EA addresses the potential environmental, cultural, and socioeconomic effects of the Scouten USARC closure, disposal, and reuse. The potential effects of the relocation of the units stationed at the Scouten USARC have been addressed in a separate EA.

ES 2 PROPOSED ACTION

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission made the following recommendations concerning the Scouten USARC, City of Mansfield, Richland County, Ohio:

> "Close the Scouten Army Reserve Center, Mansfield, OH, and the Parrott Army Reserve Center, Kenton, OH, and relocate all units to a new Armed Forces Reserve Center (AFRC) at Mansfield Air National Guard Base located at Mansfield-Lahm Airport. The new AFRC shall have the capability to accommodate units from the following facilities: Ohio Army National Guard (ARNG) Armories in Mansfield and Ashland, OH, if the state decides to relocate those National Guard units."

This recommendation was approved by the President on September 23, 2005 and was forwarded to Congress, and on November 9, 2005, the recommendation became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The proposed action is the closure, disposal, and reuse of the Scouten USARC. Reuse of the surplus property made available by the closure of the Scouten USARC would occur as a secondary action resulting from disposal. Environmental effects associated with the transfer of personnel to the new AFRC and actions related to this transfer have been evaluated under NEPA in a separate EA (Ohio Air National Guard 2008).

The Scouten USARC, located at 271 Hedges Street, Mansfield, Richland County, Ohio, was built in 1958. This site consists of 4 acres of developed land with the following structures:

- 11,759-square-foot administration building
- 2,858-square-foot detached organizational maintenance shop (OMS)

ES 3 ALTERNATIVES CONSIDERED

ES 3.1 Alternative 1 – No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Scouten USARC at levels similar to those that occurred prior to the BRAC 2005 Commission's recommendations for closure becoming final. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated. The Reserve mission at the USARC has ended and it is unlikely that it would ever resume, given the recommendation of the BRAC Commission. Nevertheless, this No Action Alternative allows comparison of impacts between the prior mission, the current caretaker status, and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

ES 3.2 Alternative 2 – Caretaker Status Alternative

The Army secured the Scouten USARC after the military mission ended on September 12, 2011 to ensure public safety and the security of remaining government property. From the time of operational closure until conveyance of the Property, the Army will provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the Scouten USARC is not transferred, the Army will reduce maintenance levels to the minimum level for surplus government property as specified in 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-1 (Army Facilities Management).

ES 3.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center

For the Preferred Alternative the Army would dispose of the Scouten USARC under a public benefit conveyance to the Mary McLeod-Bethune Intervention and Enrichment Center for use as independent living accommodations and supportive services for homeless seniors as recommended by the City of Mansfield LRA in the SSG Roy Clifton Scouten USARC Reuse Plan. The Center would support nine full-time employees and two part-time employees, including an executive director, clerical, nurses, cook, and maintenance staff.

The administration building would be renovated to fit the purposes of the homeless housing center and the other buildings would be used for storage of equipment associated with the program. The planned renovation would create efficiency permanent housing for up to 24 homeless seniors with supportive services such as: respite care; physical therapy; medication assistance; wellness programs; transportation; recreation; and in-suite emergency response. In addition to permanent housing, the Center would also provide an emergency shelter program. The emergency shelter program would provide assistance to individuals who are homeless or in need of emergency shelter due to domestic violence or other such crisis. The emergency shelter program would initially consist of financial assistance for short-term housing, transportation, counseling, childcare, case management, employment counseling, and other assistance.

Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and because there was a final reuse plan on which to base the NEPA analysis.

ES 4 ENVIRONMENTAL CONSEQUENCES

Army NEPA Regulations (32 CFR § 651.14) states the NEPA analysis should reduce or eliminate discussion of minor issues to help focus analysis. This approach minimizes unnecessary analysis and discussion during the NEPA process. CEQ Regulations for implementing NEPA (40 CFR § 1500.4(g)) emphasizes the use of the scoping process, not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the environmental assessment process.

Resource categories with more than one component (e.g., Hazardous and Toxic Substances), may have certain subcategories that can be deemphasized due to insignificance and other subcategories that should be analyzed in more detail. These resources categories will, therefore, be discussed in multiple subsections throughout Section 4.

ES 4.1 Environmental Resources Considered

Table ES-1 lists each of the environmental resource categories, and it documents which resources are present and the analyzed effect as:

- not present;
- present, but not impacted;
- present, but proposed action will have little or no measurable environmental effect; or
- present, will require detailed analysis.

Table ES-1 Summary of Resource Category Impact Analysis for the Scouten USARC.		
Resource Category (Alphabetical)	**Document Section**	**Analysis Undertaken**
AESTHETICS AND VISUAL RESOURCES	4.1.3	Resource Present; Little or No Measurable Effect
AIR QUALITY	4.1.3	Resource Present; Little or No Measurable Effect
BIOLOGICAL RESOURCES		
Critical Habitat	4.1.1	Resource Not Present
Threatened and Endangered Species (State and Federal)	4.1.1	Resource Not Present
Vegetation	4.1.2	Resource Present, Not Impacted
Wilderness Areas and Wildlife Refuges	4.1.1	Resource Not Present
Wildlife	4.1.2	Resource Present, Not Impacted
CULTURAL RESOURCES		
Archaeological Resources	4.1.1	Resource Not Present
Historic Buildings	4.1.3	Resource Present; Little or No Measurable Effect
Historic Properties of Religious or Cultural Significance to Native Americans and Tribes	4.1.1	Resource Not Present
GEOLOGY AND SOIL	4.1.2	Resource Present, Not Impacted
HAZARDOUS AND TOXIC SUBSTANCES		
Adjacent Properties	4.1.2	Resource Present, Not Impacted
Asbestos Containing Material	4.2	Detailed Analysis of Resource
		Alternative 1 - No Impact
		Alternative 2 – Beneficial Impact
		Alternative 3 – Beneficial and Adverse Impact
Lead Based Paint (LBP)	4.2	Detailed Analysis of Resource
		Alternative 1 - No Impact
		Alternative 2 – Beneficial Impact
		Alternative 3 – Beneficial and Adverse Impact
Munitions and Explosives of Concern	4.1.1	Resource Not Present
Past Uses and Operations	4.1.2	Resource Present, Not Impacted
Pits, Sumps, Drywells, and Catch Basins	4.1.1	Resource Not Present
Polychlorinated Biphenyls (PCBs)	4.1.2	Resource Present, Not Impacted
Radioactive Materials	4.1.2	Resource Present, Not Impacted
Radon	4.2	Detailed Analysis of Resource
		Alternative 1 – No Impact
		Alternative 2 – Beneficial Impact
		Alternative 3 – Beneficial and Adverse Impact
Regulatory Information	4.1.2	Resource Present, Not Impacted
Storage, Use, Release of Chemicals/Hazardous Substances	4.1.3	Resource Present; Little or No Measurable Effect
UST/ASTs	4.1.1	Resource Not Present
Waste Disposal Sites	4.1.1	Resource Not Present

Table ES-1 Summary of Resource Category Impact Analysis for the Scouten USARC.		
Resource Category (Alphabetical)	**Document Section**	**Analysis Undertaken**
LAND USE		
Current and Future Development in the Region of Influence	4.3	Detailed Analysis of Resource
		Alternative 1 – No Impact
		Alternative 2 – No Impact
		Alternative 3 – No Impact
Installation Land/Airspace Use	4.3	Detailed Analysis of Resource
		Alternative 1 – No Impact
		Alternative 2 – No Impact
		Alternative 3 – Beneficial Impact
National and State Parks	4.1.1	Resource Not Present
Prime and Unique Farmland	4.1.1	Resource Not Present
Surrounding Land/Airspace Use	4.1.2	Resource Present, Not Impacted
NOISE	4.1.3	Resource Present; Little or No Measurable Effect
SOCIOECONOMICS		
Economic Development	4.4	Detailed Analysis of Resource
		Alternative 1 – No Impact
		Alternative 2 – Adverse Impact
		Alternative 3 – Beneficial Impact
Environmental Justice	4.4	Detailed Analysis of Resource
		Alternative 1 – No Impact
		Alternative 2 – No Impact
		Alternative 3 – No Impact
Demographics	4.4	Detailed Analysis of Resource
		Alternative 1 – No Impact
		Alternative 2 – No Impact
		Alternative 3 – Beneficial Impact
Housing	4.1.2	Resource Present, Not Impacted
Protection of Children	4.4	Detailed Analysis of Resource
		Alternative 1 – No Impact
		Alternative 2 – No Impact
		Alternative 3 – No Impact
Public Services	4.1.3	Resource Present; Little or No Measurable Effect
TRANSPORTATION		
Roadways and Traffic	4.1.3	Resource Present; Little or No Measurable Effect
Public Transportation	4.1.3	Resource Present; Little or No Measurable Effect
UTILITIES		
Communications	4.1.2	Resource Present, Not Impacted
Energy Sources (Electrical, Gas, etc)	4.1.2	Resource Present, Not Impacted
Potable Water Supply	4.1.2	Resource Present, Not Impacted
Solid Waste	4.1.2	Resource Present, Not Impacted
Storm Water System	4.1.2	Resource Present, Not Impacted

Table ES-1 Summary of Resource Category Impact Analysis for the Scouten USARC.		
Resource Category (Alphabetical)	**Document Section**	**Analysis Undertaken**
Wastewater System	4.1.2	Resource Present, Not Impacted
WATER RESOURCES		
Floodplains/Coastal Barriers and Zones	4.1.1	Resource Not Present
Hydrology/Groundwater	4.1.2	Resource Present, Not Impacted
National Wild and Scenic Rivers	4.1.1	Resource Not Present
Surface Water (Streams, Ponds, etc.)	4.1.1	Resource Not Present
Wetlands	4.1.1	Resource Not Present

The EA performed an analysis of 12 resource categories including a detailed analysis of three resource categories for each alternative: land use (installation land/airspace use, and current and future development in the region of influence), hazardous and toxic substances (asbestos, lead based paint, and radon), and socioeconomics (economic development, environmental justice, demographics, and protection of children). The analyses in the EA concluded there would be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or alternatives. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted, and preparation of an Environmental Impact Statement (EIS) is not required.

ES 4.2 BEST MANAGEMENT PRACTICES

No significant adverse or significant beneficial impacts have been identified or are anticipated as a result of implementing any of the Proposed Action alternatives or the No Action Alternative.

Local, state, and federal regulations for noise, air, water, and soil resources will be adhered to during all phases of demolition and construction, as appropriate, to minimize impacts associated with implementing the proposed action.

ES 5 CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500), and 32 CFR 651 Environmental Analysis of Army Actions. As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the each of the Implementation Alternatives and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a FNSI is warranted, and preparation of an EIS is not required.

Either of the action alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC law (Public Laws 101-510); consequently, it has not been selected for implementation.

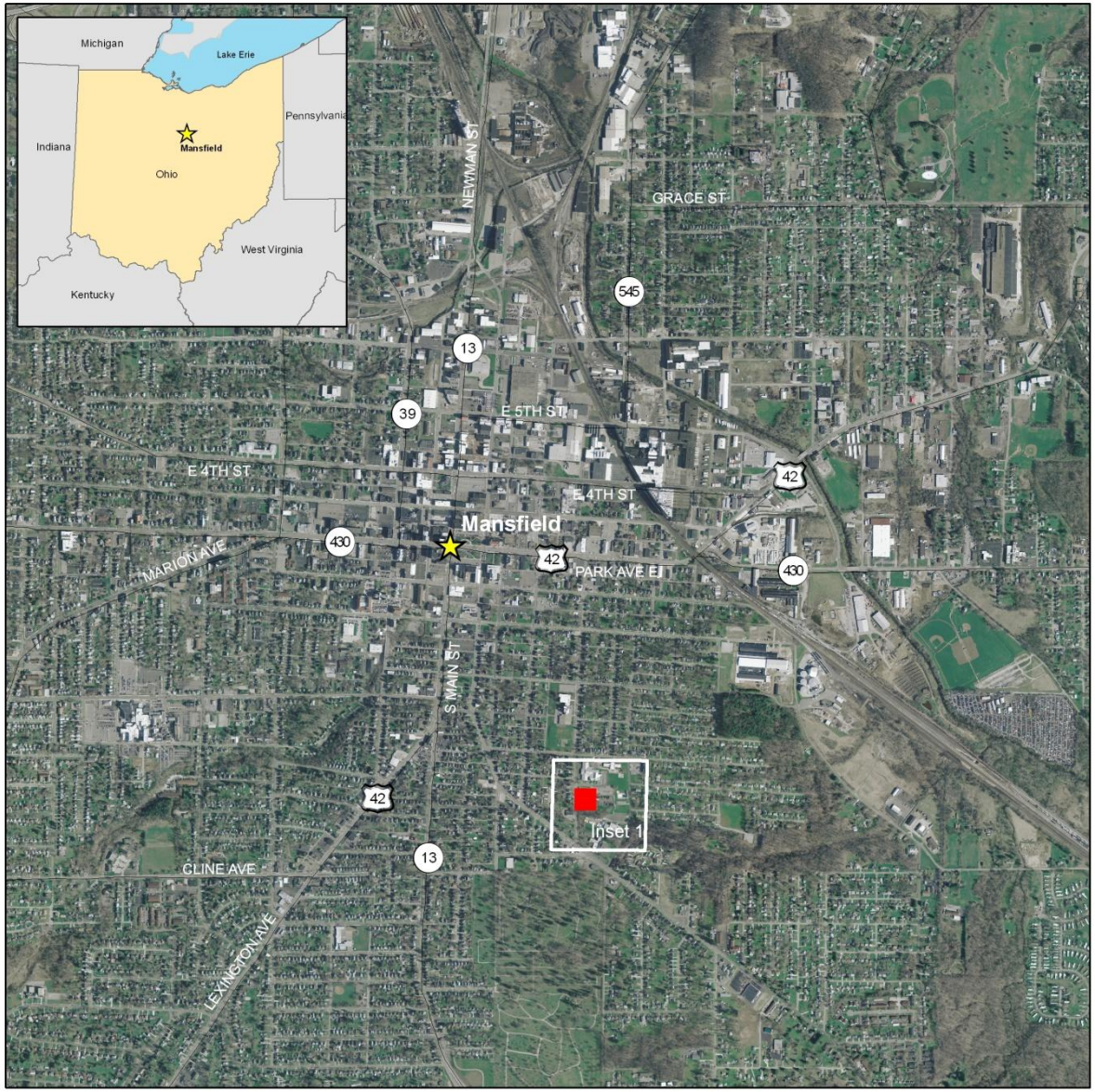
Alternative 3 is the preferred alternative of the Army and the LRA. This alternative would include the reuse of the facility as independent living accommodations for the homeless by the Mary McLeod-Bethune Intervention and Enrichment Center.

1.0 INTRODUCTION

This Environmental Assessment (EA) analyzes the environmental impacts of the proposed closure, disposal, and reuse of the SSG Roy Clifton Scouten United States Army Reserve Center (USARC), Mansfield, Ohio (Figure 1-1). This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) [42 United States Code (U.S.C.) § 4321 et seq.]; implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

1.1 Purpose and Need of the Proposed Action

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission recommended closure of the Scouten USARC (Figure 1-2) and realignment of essential missions to other installations. The deactivated USARC property is excess to Army military needs and will be disposed of according to applicable laws and regulations.



Legend

- Scouten USARC
- City
- Roads

0 0.25 0.5

Approximate Scale in Miles

Figure 1-1
Location Map for the Scouten USARC

Mansfield, Ohio

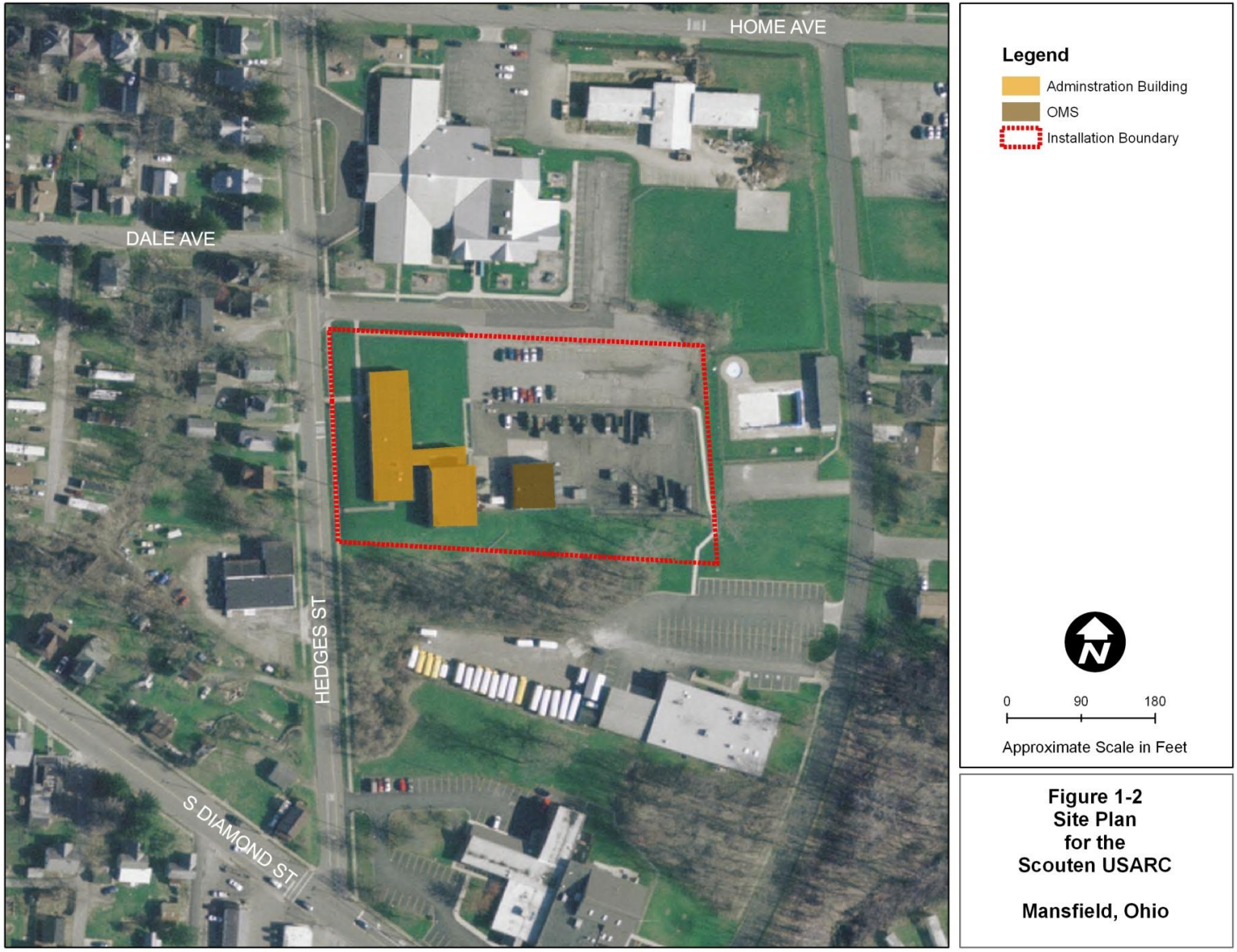


Figure 1-2
Site Plan
for the
Scouten USARC

Mansfield, Ohio

1.2 Public Involvement

The Army is committed to open decision-making. The collaborative involvement of other agencies, organizations, and individuals in the NEPA process enhances issue identification and problem solving. In preparing this EA, the Army consulted or coordinated with the US Environmental Protection Agency, US Department Of Housing And Urban Development, the City of Mansfield, the Richland County Commissioners, the City of Mansfield Local Redevelopment Authority (LRA), Ohio Environmental Protection Agency, Ohio Department of Development, Ohio Department of Natural Resources, appropriate Native American tribes, the State Historic Preservation Officer (SHPO), US Fish and Wildlife Service, and others as appropriate.

The 30-day public review period begins by publishing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in a local newspaper, *Mansfield News Journal*, and a regional newspaper, *Cleveland Plain Dealer*. The EA and draft FNSI are made available during the public review period at the Mansfield/Richland County Public Libraries of Main Library (43 West Third Street, Mansfield, Ohio 44902) and Crestview Branch (1575 SR 96 East, Ashland, Ohio 44805), and on the BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. The Army invites the public and all interested and affected parties to review and comment on this EA and the draft FNSI. Written comments and requests for information should be submitted to the BRAC Environmental Coordinator of the United States Army Reserve (USAR) 88TH Regional Support Command (RSC): Lisa Gulbranson at 506 Roeder Circle, Fort Snelling, Minnesota 55111-4009, 612-713-3752 or lisa.gulbranson@us.army.mil.

At the end of the public review period, the Army will review all comments received; compare environmental impacts associated with reasonable alternatives; revise the FNSI or the EA, if necessary; supplement the EA, if needed; and make a decision. If potential impacts are found to be significant, the Army can decide to (1) not proceed with the proposed action, (2) proceed with the proposed action after committing to mitigation reducing the anticipated impact to a less than significant impact in the revised Final FNSI, or (3) publish a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) in the Federal Register.

2.0 DESCRIPTION OF THE PROPOSED ACTION

The proposed action is the closure, disposal, and reuse of surplus property made available by the realignment of Scouten USARC. Redevelopment and reuse of the surplus USARC property (the Property) would occur as a secondary action under disposal.

Under BRAC law, the Army was required to close the Scouten USARC not later than September 15, 2011. The Scouten USARC was closed on September 12, 2011 and the Army will dispose of the property. As a part of the disposal process, the Army screened the Property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

2.1 BRAC Commission's Recommendation

The BRAC Commission's recommendation is to:

> "Close the Scouten Army Reserve Center, Mansfield, OH, and the Parrott Army Reserve Center, Kenton, OH, and relocate all units to a new AFRC at Mansfield Air National Guard Base located at Mansfield-Lahm Airport. The new AFRC shall have the capability to accommodate units from the following facilities: Ohio ARNG Armories in Mansfield and Ashland, OH, if the state decides to relocate those National Guard units."

The environmental impacts resulting from the construction and operation of the new Armed Forces Reserve Center are analyzed in the Environmental Assessment for the Proposed Construction of the 200th Red Horse Squadron, Armed Forces Reserve Center, and Field Maintenance Shop at the Mansfield-Lahm Regional Airport, Mansfield, Ohio.

2.2 Local Redevelopment Authority's Reuse Plan

At a public meeting on August 1, 2006, the Mansfield, Ohio City Council passed a resolution establishing the City of Mansfield Local Redevelopment Authority (the LRA) for the purpose of formulating a recommendation for the reuse of the Scouten USARC. According to the Federal Property Administrative Services Act of 1949 and the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, the LRA screened this Federal Government surplus property by soliciting notices of interest from state and local governments, representatives of the homeless, and other interested parties. After reviewing one reuse proposal received on January 26, 2007, recommendations, and all public comments, the LRA recommended that the Property be reused by the Mary McLeod-Bethune Intervention and Enrichment Center as a facility to provide services and shelter for the homeless as defined in the McKinney-Vento Homeless Assistance Act under 42 U.S.C. Section 11302. The LRA reuse plan was originally approved by the City of Mansfield on December 19, 2007 and was amended on June 1, 2010 at the recommendation of the US Department of Housing and Urban Development. The amended reuse plan was approved by the US Department of Housing and Urban Development on June 24, 2010. In accordance with the LRA Reuse Plan (Appendix D), the Army proposes to transfer the entire Property to the Mary McLeod-Bethune Intervention and Enrichment Center by a public benefit conveyance for reuse.

2.3 Description of the Scouten USARC

In 1956, the US Government purchased approximately 4 acres of undeveloped land, located at 271 Hedges Street, Mansfield, Richland County, Ohio, to construct an Army Reserve Center. Currently, the Property has two permanent structures and two parking lots:

Photograph 1. Administration building.

Photograph 2. Drill hall attached to southeast side of administration building.

Photograph 3. Organizational maintenance shop.

Photograph 4. Military equipment parking area adjacent to organizational maintenance shop.

- Administration building (approximately 11,759 square feet)
    - 8,200-square-foot one-story administrative section
    - 3,600-square-foot two-story drill hall connected to the administrative section by a one-story, L-shaped enclosed corridor
- 2,858-square-foot detached organizational maintenance shop (OMS)

Figure 1-2 shows the Scouten USARC site plan. The entire administration building is a block building with a brick exterior and consists of the two main sections listed above. The OMS is a two-bay block building with a brick exterior. Both buildings were built in 1958. An approximately 0.75-acre military equipment parking area and a 0.5-acre privately owned vehicle parking area are also on the site. Approximately 55 percent of the site is covered by impervious surfaces such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining 45 percent of land is mowed lawn areas with a few trees. Chain-link security fencing encloses the OMS and the military equipment parking lot. The site is currently occupied by the US Army Reserve 486th Engineer Company 3rd Platoon (Vertical Construction) consisting of 44 enlisted reservists who drill on weekends, 1 warrant officer, and 1 full-time employee.

3.0 ALTERNATIVES

3.1 Alternative 1 – No Action Alternative:

Under the No Action Alternative, the Army would continue operations at the Scouten USARC at levels similar to those that occurred prior to the BRAC Commission's recommendations for closure becoming final. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated. The Reserve mission at the USARC has ended and it is unlikely that it would ever resume, given the recommendation of the BRAC Commission. Nevertheless, this No Action Alternative allows comparison of impacts between the prior mission, the current caretaker status, and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

3.2 Alternative 2 – Caretaker Status Alternative

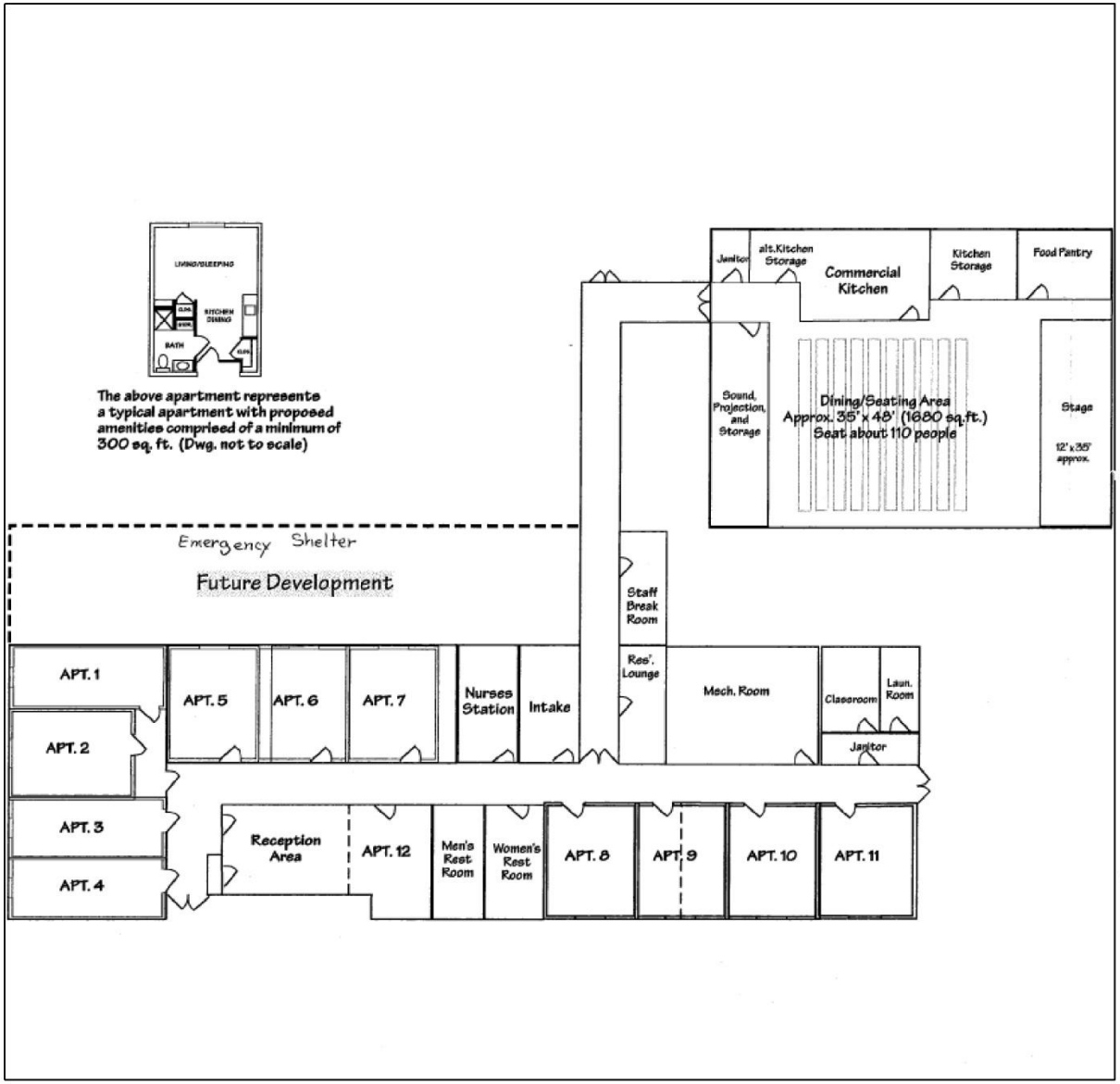
The Army secured the Scouten USARC after the military mission ended on September 12, 2011 to ensure public safety and the security of remaining government property. From the time of operational closure until conveyance of the Property, the Army will provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the Scouten USARC is not transferred, the Army will reduce maintenance levels to the minimum level for surplus government property as specified in 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-1 (Army Facilities Management).

3.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center

For the Preferred Alternative the Army would dispose of the Scouten USARC under a public benefit conveyance to the Mary McLeod-Bethune Intervention and Enrichment Center for use as independent living accommodations and supportive services for homeless seniors as recommended by the City of Mansfield LRA in the SSG Roy Clifton Scouten USARC Reuse Plan (See Appendix D). The Center would support nine full-time employees and two part-time employees, including an executive director, clerical, nurses, cook, and maintenance staff.

The proposed reuse of the Property is depicted in Figure 3-1. The administration building would be renovated to fit the purposes of the homeless housing center and the other buildings would be used for storage of equipment associated with the program. The planned renovation would create efficiency permanent housing for up to 24 homeless seniors with supportive services such as: respite care; physical therapy; medication assistance; wellness programs; transportation; recreation; and in-suite emergency response. In addition to permanent housing, the Center would also provide an emergency shelter program. The emergency shelter program would provide assistance to individuals who are homeless or in need of emergency shelter due to domestic violence or other such crisis. The emergency shelter program would initially consist of financial assistance for short-term housing, transportation, counseling, childcare, case management, employment counseling, and other assistance.

Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and because there was a final reuse plan on which to base the NEPA analysis.



Proposed Renovation of the Scouten USARC for the Mary McLeod-Bethune Intervention and Enrichment Center

Independent Living for Homeless Seniors with Supportive Services

NOT TO SCALE

Figure 3-1
Reuse Plan for the Scouten USARC

Mansfield, Ohio

3.4 Alternatives Considered and Eliminated From Further Analysis

3.4.1 Early Transfer and Reuse before Cleanup is Completed

Under this alternative, the Army would take advantage of various property transfer and disposal methods that allow the reuse of contaminated property to occur before all remedial actions have been completed. One method is to transfer the property to a new owner who agrees to perform, or to allow the Army to perform, all remedial actions required under applicable Federal and state requirements. Allowing the property to be transferred before cleanup is complete requires concurrence of environmental regulatory authorities and the governor of the affected state. The property must be suitable for the new owner's intended use and the intended use must be consistent with protection of human health and the environment. This alternative was not carried forward for further analysis because the Environmental Condition of Property (ECOP) report classifies the Property as Type 1, one of seven US Department of Defense (DoD) Environmental ECOP categories (USACE 2007). A Type 1 classification is an area or parcel of real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties). Because the Property is uncontaminated and no remedial action is required, the Scouten USARC does not meet the criteria for the early transfer prior to cleanup alternative.

3.4.2 Other Disposal Options

The City of Mansfield LRA screened this Federal Government surplus property by soliciting notices of interest from state and local governments, representatives of the homeless, and other interested parties, as required by the Federal Property Administrative Services Act of 1949, the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, and Redevelopment and Homeless Assistance Act of 1994. The only notice of interest received by the LRA for reuse of the Property was from the Mary McLeod-Bethune Intervention and Enrichment Center, as described in the preferred alternative. Richland County had briefly considered using the Property to expand its Juvenile Court and Juvenile Detention system, but it determined that updating and maintaining the property would have overburdened its budget. Since no other entities submitted a notice of interest for reusing the Property, there were no other alternatives carried forward for analysis in this EA.

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4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

Army NEPA Regulations (32 CFR § 651.14) state the NEPA analysis should reduce or eliminate discussion of minor issues to help focus analysis on the resource categories that may be affected. This approach minimizes unnecessary analysis and discussion during the NEPA process. CEQ Regulations for implementing NEPA (40 CFR § 1500.4(g)) emphasize the use of the scoping process, not only to identify those environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the environmental assessment process.

Resource categories with more than one component (e.g., Hazardous and Toxic Substances), may have certain subcategories that can be deemphasized due to insignificance and other subcategories that should be analyzed in more detail. These resources categories will, therefore, be discussed in multiple subsections throughout Section 4.

4.1 Environmental Resources Considered

Table 4-1 lists each of the environmental resource categories, and it documents which categories:

- are not present;
- are present, but not impacted;
- are present, but impacts are minor, obvious, and do not require further analysis; or
- require detailed analysis.

Table 4-1 Summary of Resource Category Impact Analysis for the Scouten USARC.

Resource Category (Alphabetical)	Document Section	Analysis Undertaken
AESTHETICS AND VISUAL RESOURCES	4.1.3	Resource Present; Little or No Measurable Effect
AIR QUALITY	4.1.3	Resource Present; Little or No Measurable Effect
BIOLOGICAL RESOURCES		
Critical Habitat	4.1.1	Resource Not Present
Threatened and Endangered Species (State and Federal)	4.1.1	Resource Not Present
Vegetation	4.1.2	Resource Present, Not Impacted
Wilderness Areas and Wildlife Refuges	4.1.1	Resource Not Present
Wildlife	4.1.2	Resource Present, Not Impacted
CULTURAL RESOURCES		
Archaeological Resources	4.1.1	Resource Not Present
Historic Buildings	4.1.3	Resource Present; Little or No Measurable Effect
Historic Properties of Religious or Cultural Significance to Native Americans and Tribes	4.1.1	Resource Not Present
GEOLOGY AND SOIL	4.1.2	Resource Present, Not Impacted
HAZARDOUS AND TOXIC SUBSTANCES		
Adjacent Properties	4.1.2	Resource Present, Not Impacted
Asbestos Containing Material	4.2	Detailed Analysis of Resource
Lead Based Paint (LBP)	4.2	Detailed Analysis of Resource

Table 4-1 Summary of Resource Category Impact Analysis for the Scouten USARC.		
Resource Category (Alphabetical)	**Document Section**	**Analysis Undertaken**
Munitions and Explosives of Concern	4.1.1	Resource Not Present
Past Uses and Operations	4.1.2	Resource Present, Not Impacted
Pits, Sumps, Drywells, and Catch Basins	4.1.1	Resource Not Present
Polychlorinated Biphenyls (PCBs)	4.1.2	Resource Present, Not Impacted
Radioactive Materials	4.1.2	Resource Present, Not Impacted
Radon	4.2	Detailed Analysis of Resource
Regulatory Information	4.1.2	Resource Present, Not Impacted
Storage, Use, Release of Chemicals/Hazardous Substances	4.1.3	Resource Present; Little or No Measurable Effect
UST/ASTs	4.1.1	Resource Not Present
Waste Disposal Sites	4.1.1	Resource Not Present
LAND USE		
Current and Future Development in the Region of Influence	4.3	Detailed Analysis of Resource
Installation Land/Airspace Use	4.3	Detailed Analysis of Resource
National and State Parks	4.1.1	Resource Not Present
Prime and Unique Farmland	4.1.1	Resource Not Present
Surrounding Land/Airspace Use	4.1.2	Resource Present, Not Impacted
NOISE	4.1.3	Resource Present; Little or No Measurable Effect
SOCIOECONOMICS		
Economic Development	4.4	Detailed Analysis of Resource
Environmental Justice	4.4	Detailed Analysis of Resource
Demographics	4.4	Detailed Analysis of Resource
Housing	4.1.2	Resource Present, Not Impacted
Protection of Children	4.4	Detailed Analysis of Resource
Public Services	4.1.3	Resource Present; Little or No Measurable Effect
TRANSPORTATION		
Roadways and Traffic	4.1.3	Resource Present; Little or No Measurable Effect
Public Transportation	4.1.3	Resource Present; Little or No Measurable Effect
UTILITIES		
Communications	4.1.2	Resource Present, Not Impacted
Energy Sources (Electrical, Gas, etc)	4.1.2	Resource Present, Not Impacted
Potable Water Supply	4.1.2	Resource Present, Not Impacted
Solid Waste	4.1.2	Resource Present, Not Impacted
Storm Water System	4.1.2	Resource Present, Not Impacted
Wastewater System	4.1.2	Resource Present, Not Impacted

Table 4-1 Summary of Resource Category Impact Analysis for the Scouten USARC.		
Resource Category (Alphabetical)	**Document Section**	**Analysis Undertaken**
WATER RESOURCES		
Floodplains/Coastal Barriers and Zones	4.1.1	Resource Not Present
Hydrology/Groundwater	4.1.2	Resource Present, Not Impacted
National Wild and Scenic Rivers	4.1.1	Resource Not Present
Surface Water (Streams, Ponds, etc.)	4.1.1	Resource Not Present
Wetlands	4.1.1	Resource Not Present

4.1.1 Environmental Resource Categories That Are Not Present

None of the Alternatives would have direct, indirect, or cumulative impacts on certain subcategories of these resource categories, because these subcategories do not exist on or near the Property:

- **Critical Habitat** – The Scouten USARC is in an urban setting, is highly disturbed, lacks natural habitat and the US Fish and Wildlife Service (USFWS) has not designated critical habitat on or in the vicinity of the Property (Appendix A).
- **Threatened and Endangered Species (State and Federal)** – Coordination was conducted with the US Fish and Wildlife Service and the Ohio Department of Natural Resources (Appendix A). No species protected under Federal or state laws are known to exist on the Property.
- **Wilderness Areas and Wildlife Refuges** – The nearest Federal wilderness area is the West Sister Island Wilderness Area, which is located in Lake Erie approximately 75 miles from the Property. The nearest national wildlife refuge is Ottawa National Wildlife Refuge, which is located adjacent to Lake Erie approximately 70 miles from the Property.
- **Archeological Resources –** No archaeological resources occur within the boundaries of the Scouten USARC. SHPO coordination is presented in Appendix A.
- **Historic Properties of Religious or Cultural Significance to Native Americans and Tribes –** No historic properties of religious or cultural significance to the Absentee-Shawnee Tribe of Indians of Oklahoma, Cayuga Nation, Cherokee Nation, Delaware Nation, Eastern Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Forest County Potawatomi Community of Wisconsin, Miami Tribe of Oklahoma, Ottawa Tribe of Oklahoma, Seneca Nation of Indians, Seneca-Cayuga Tribe of Oklahoma, or the Wyandotte have been identified through consultation. Native American coordination is presented in Appendix A.
- **Munitions and Explosives of Concern** – No evidence was found during the ECOP site reconnaissance or records review process of the storage, usage, or disposal of munitions and explosives of concern (MEC).
- **Pits, Sumps, Drywells, and Catch Basins** – Available records, interviews, and ECOP site reconnaissance did not indicate the existence or past existence of any pits, sumps,

drywells, or catch basins. An oil/water separator (OWS) was formerly located on the Property as part of the wash rack facility. The OWS and vehicle wash rack were removed in April 2002. There was no evidence of contamination based on visual observation and this was confirmed by laboratory analysis of soil samples collected during removal activities (USACE 2007; Jones Technology 2004).

- **UST/ASTs –** No aboveground storage tanks (ASTs) have historically been located on the Property or are currently located on the Property. One underground storage tank (UST) associated with this facility was removed in 1998, and a closure assessment report was submitted to the Bureau of Underground Storage Tank Regulations (BUSTR) in February 1999. It was determined there was no release from the 500-gallon UST (USACE 2007). In a letter dated June 15, 1999, BUSTR issued a No Further Action (NFA) for the UST closure.
- **Waste Disposal Sites** – An Environmental ECOP Report (USACE 2007) was completed in general accordance with the US DoD requirements. The Property is not registered as a waste generator and does not have a state solid waste registration number or a United States Environmental Protection Agency (USEPA) identification number. The Property is not a permitted solid waste facility and is not required to maintain a solid waste permit. USAR personnel stated no waste had been disposed, buried, or burned on the Property.
- **National and State Parks** – The nearest national (park, monument, recreational area, historic site, etc.) is Cuyahoga Valley National Park, which is located approximately 60 miles from the Property. The nearest state park is Cedar Hill State Park, which is located approximately 9 miles from the Property.
- **Prime and Unique Farmlands** – The Property is not prime or unique farmland as defined by 7 CFR 658.2(a), because the definition of farmland does not include land already in or committed to urban development.
- **Floodplains/Coastal Barriers and Zones** – The Property is not located within a 100- or 500-year floodplain (Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Flood Plain Panel 39139C0144E, April 4, 2011). The Ohio Department of Natural Resources, Office of Coastal Management is the lead agency for the Ohio Coastal Management Program. The Scouten USARC parcel is not in a coastal zone and is not included in the coastal zone management plan (ODNR 2011).
- **National Wild and Scenic Rivers** – The nearest National Wild and Scenic River is Big Darby Creek, which is located approximately 65 miles from the Property.
- **Surface Water (Streams, Ponds, etc.)** – The site reconnaissance revealed that no streams, ponds, or other surface water features are present on the Property. However, an unnamed creek was identified approximately 100 feet south of the Property. The Property is situated at an elevation of approximately 1,286 feet above mean sea level and is relatively flat. Surface water from the site infiltrates into the underlying soil. Surface water that does not infiltrate into the underlying soil generally moves via sheet flow toward the southeast portion of the Property. A French drain runs along the south side of the MEP area. Surface water eventually flows into the City of Mansfield stormwater system. The proposed action would not affect surface water resources.

- **Wetlands** – Site reconnaissance was conducted by a qualified wetland biologist. No evidence of wetlands was observed on the Property including wetland vegetation, hydric soils, or wetland hydrology.

4.1.2 Environmental Resources That Are Present, But Not Impacted

None of the alternatives would have direct, indirect, or cumulative impacts on certain subcategories of the environmental categories, because no demolition or new construction activities are planned that would alter or affect these resources:

- **Vegetation** – None of the alternatives would have a significant direct, indirect, or cumulative impact on the vegetation on the Property. Typical urban vegetation (including mowed grass and ornamental trees and shrubs) is present at the site, but would not be impacted.
- **Wildlife** – None of the alternatives would have a significant direct, indirect, or cumulative impact on wildlife on the Property. Typical urban wildlife (e.g., songbirds, small mammals, etc.) is present at the site, but would not be impacted.
- **Geology and Soil –** None of the alternatives would have a significant direct, indirect, or cumulative impact on the geology or soil on the Property. Geological hazards such as sinkholes, caves, mines, or quarries do not exist on or adjacent to the Property. Seismic risk is relatively small.
- **Adjacent Properties (Hazardous and Toxic Substances)** – According to the 2007 ECOP an adjacent property that formerly contained six USTs is on an equal elevation with the USARC. Because all the tanks are closed with an NFA status, these USTs are assumed to have had no significant impact on the Property (USACE 2007).
- **Past Uses and Operations (Hazardous and Toxic Substances) –** The alternatives would have no direct, indirect, or cumulative impact on hazardous and toxic substances from the past uses and operations of the Property. The Property has primarily functioned as an administrative and educational facility, with minor maintenance performed on military vehicles in the OMS. According to USAR personnel, the Property has been used as a USARC since its purchase by the US government in 1956, and has not been leased to or occupied by other entities. An outdoor hazardous material storage shed is located north of the OMS building within the MEP area and is used to store potentially hazardous substances and petroleum, oil, and lubricant (POL) products. The OMS has been used to perform routine, limited preventive maintenance on military equipment such as vehicle fluid, brake, and electrical checks. Large-scale maintenance activities are conducted at an Area Maintenance Support Activity (AMSA) shop located at one of the other USARCS.

  Vehicle washing routinely occurred at a vehicle wash rack previously located on the property. An OWS and vehicle wash rack were removed in April 2002. There was no evidence of contamination based on visual observation, and this was confirmed by laboratory analysis of soil samples collected during removal activities (Jones Technology 2004).
- **Polychlorinated Biphenyls (PCBs)** – The alternatives would have no direct, indirect, or cumulative impact on PCBs on the Property. During a site-specific PCB survey

conducted in 2005, light ballasts were observed in the OMS building that were labeled as "No PCBs," and none were noted in the main building (USACE 2007). Three pole-mounted transformers were noted on the Property that did not have labels indicating the absence or presence of PCBs. During the 2011 site reconnaissance, the transformer exteriors appeared to be in good condition and no evidence of leakage was observed.

- **Radioactive Materials** – No radiation sources were observed during the ECOP site reconnaissance or the site evaluation for this document. Based on a review of available records, the ECOP site reconnaissance, and interviews with USAR personnel, a small amount of radioactive materials were present in equipment used on the Property, including testing and calibration equipment. According to site interviews, however, there were no known releases of radiological materials on the Property. The Scouten USARC will have a radiological clearance survey prior to transfer to clear the facility for unrestricted use.
- **Regulatory Information (Hazardous and Toxic Substances) –** Nine separate properties near or adjacent to the USARC were evaluated as potential risk properties to the Scouten USARC property. These adjacent properties were identified as a result of information obtained during area reconnaissance, interviews, and regulatory database searches. Based on an evaluation of available site information and details concerning the properties, eight of the facilities evaluated do not exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site. One facility, located south of the Property, has an active file with BUSTR for a leaking UST. However, this facility is located 800 feet away from the USARC and in a cross-gradient direction from the Property, and it is unlikely that a release from the facility would impact the Property.
- **Surrounding Land/Airspace Use** – The alternatives would have no direct, indirect, or cumulative impact on surrounding land/airspace use. The Scouten USARC parcel is bounded to the west by Hedges Street and surrounding residential area. To the south and southeast is the Richland New Hope Center that provides social services and houses a vehicle maintenance facility. The New Hope Child Care Center is located to the north, and a public swimming pool is located to the east.
- **Housing Resources** – The alternatives would have no direct, indirect, or cumulative impact on the surrounding housing resources. The addition of up to 12 homeless senior housing units for up to 24 individuals would be a minimal addition of housing to the community.
- **Utilities** – None of the alternatives would have a significant direct, indirect, or cumulative impact on utilities, because the utilities have the capacity to provide service for any of the alternatives and any changes in demand and usage would be minor. The utilities include the potable water supply (City of Mansfield), wastewater system (City of Mansfield), storm water system (City of Mansfield), electric service (Ohio Edison), natural gas (Columbia Gas of Ohio), and solid waste disposal.
- **Hydrology and groundwater** – These resources are present on or underneath the Property, but would not be impacted by the proposed action.

4.1.3 Resources are Present, but Little to No Measurable Environmental Effect

- **Aesthetics and Visual Resources –** None of the alternatives would have a significant direct, indirect, or cumulative impact on aesthetics or visual resources because the existing buildings and footprint would remain unchanged. Minor renovations and landscaping could have minor beneficial impacts, but do not require further analysis.

- **Air Quality** – None of the Alternatives would have a significant direct, indirect, or cumulative impact on air quality in the region because there will not be a measurable change in air emissions by renovating the USARC and converting it into a homeless senior housing facility. The status of the air quality in a given area is determined by the concentrations of various pollutants in the atmosphere. The Federal Clean Air Act (CAA) (42 USC 7401-7671q) required the USEPA to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality pollutant levels throughout the United States. The General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), requires any federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the General Conformity Rule's requirements and complete a Record of Non-applicability (RONA) or positively determine that the action conforms to the provisions and objectives of the applicable State Implementation Plan (SIP). The proposed action for the Scouten USARC will occur within Richland County, which is designated as "in attainment" for all USEPA NAAQS criteria pollutants; therefore, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. No further analysis and no further documentation are required.

- **Historic Buildings –** The administration building and OMS at the Scouten USARC were constructed more than 50 years ago. The Scouten USARC was evaluated for eligibility for listing in the National Register of Historic Places (NRHP) and was recommended as not eligible. The Ohio Historic Preservation Office concurred with the determination on April 23, 2009 (Appendix A). No NRHP-eligible cultural resources have been identified at the Scouten USARC. No further analysis is required.

- **Storage, Use, Release of Chemicals/Hazardous Substances –** The alternatives would have no significant direct, indirect, or cumulative impact on storage, use, or release of chemicals/hazardous substances. Activities associated with past uses made it necessary to store and use paint and POL. The ECOP (USACE 2007) classified the Property as a Type 1, which is an area or parcel of real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).

- **Noise –** The alternatives would have no significant direct, indirect, or cumulative impact on noise levels, because noise levels would be *de minimis*. The major source of noise would continue to be from vehicle traffic. Under the No Action Alternative these noise sources would remain unchanged. Under the Caretaker Status Alternative these noise sources would be reduced because of the cessation of training activities and associated military vehicle usage at the USARC. Under the Preferred Alternative, noise sources would include privately owned vehicles, service vehicles, and HVAC. The noise levels associated with each of the alternatives are equal to or less than the current use and would be compatible with surrounding noise levels. The Army classifies areas with noise levels

from these sources as Zone 1, compatible with all land uses, including residential. The nearest sensitive noise receptor is the Richland County Early Childhood Center, adjacent to the Property, and the noise levels associated with each of the alternatives would be compatible with the center's noise levels. No further analysis is required.

- **Public Services** – None of the alternatives would have a significant direct, indirect, or cumulative impact on public services because these public service providers are operating below their capacity to provide service and any changes in demands would be negligible**.** Providers include the Mansfield Division of Fire, Mansfield Division of Police, and MedCentral Health System, Mansfield Hospital.
- **Roadways and Traffic –** The alternatives would have no significant direct, indirect, or cumulative impact on roadways and traffic because the roadways and signage present are adequate to provide service. The action alternatives would change the times of higher traffic volume, but these impacts would be minor. The types of vehicles used at the Property under each action alternative would differ, but the overall impact to transportation would be minor. No further analysis is required.
- **Public Transportation –** The alternatives would have no significant direct, indirect, or cumulative impact on public transportation because the current public transportation capacity is adequate to provide service. The action alternatives would change the times of public transportation usage, but these impacts would be minor. No further analysis is required.

4.2 Hazardous and Toxic Substances

4.2.1 Affected Environment

Specific environmental statutes and regulations govern hazardous material and hazardous waste management activities at the Scouten USARC. For the purpose of this analysis, the terms hazardous waste, hazardous materials, and toxic substances include those substances defined as hazardous by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), AR 200-1, and Toxic Substances Control Act (TSCA). In general, they include substances that, because of their quantity, concentration, or physical, chemical, or toxic characteristics, may present moderate danger to public health or welfare or the environment upon release. An ECOP Report was completed for the Scouten USARC in 2007. This facility was classified as a DoD Environmental ECOP Category 1 property indicating an area or parcel of real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties) (USACE 2007).

4.2.1.1 Asbestos Containing Material

A site-specific asbestos-containing material (ACM) survey was conducted at the Scouten USARC as part of the *2005 Environmental Survey Report – Asbestos, PCB, Lead-based Paint, and Radon Survey*. Asbestos-containing floor tiles and mastic in the main building were found to contain asbestos, as did a water storage tank in the mechanical room; thermal pipe insulation and pipe fittings throughout the building; exhaust flue mud in the mechanical room; transite wall board in the men's bathroom; and joint tape/mud compound throughout the building. The folding divider between Classrooms 1 and 2 was suspected to contain asbestos, but it was not confirmed. No ACM was found in the OMS building. Roofing materials, fire doors, and

electrical wiring in both facilities were suspected to contain asbestos, but it was not confirmed (USACE 2007).

4.2.1.2 Lead-Based Paint

A site-specific lead-based paint (LBP) survey was conducted at the Scouten USARC as part of the *2005 Environmental Survey Report – Asbestos, PCB, Lead-based Paint, and Radon Survey*. The survey confirmed LBP was found to be on the interior walls of the boiler room and in the men's bathroom in the main building. In the OMS building, LBP was found on the grey metal doors and on the interior overhead door components (USACE 2007).

4.2.1.3 Radon

A site-specific radon survey was conducted at the Scouten USARC as part of the *2005 Environmental Survey Report – Asbestos, PCB, Lead-based Paint, and Radon Survey*. Passive detection equipment was installed throughout the main building and OMS building to determine levels of radon gas. Based on the sampling results, all sample locations exhibited radon levels above USEPA's recommended maximum exposure level of 4 pCi/L (USACE 2007).

4.2.2 Consequences

4.2.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of hazardous and toxic substance are anticipated. Because the Scouten USARC would not close and personnel would not be realigned; no direct impacts are anticipated. There would be no change in the generation and disposal of hazardous and toxic substances.

Indirect Impacts. No changes to the existing baseline conditions of hazardous and toxic substances are anticipated. Because the Scouten USARC would not close and personnel would not be realigned; no indirect impacts are anticipated. There would be no change in the generation and disposal of hazardous and toxic substances.

4.2.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Negligible short-term beneficial direct impacts are expected to hazardous and toxic substances under this alternative. The Army would continue maintenance activities necessary to protect the property and buildings from deterioration. This would include maintaining the interior floors in a manner that preserves the asbestos floor tiles and not handling or compromising the integrity of the water storage tank in the mechanical room; thermal pipe insulation and pipe fittings throughout the building; exhaust flue mud in the mechanical room; transite wall board in the men's bathroom; and joint tape/mud compound throughout the building. Any remaining small quantities of hazardous and toxic substances would be disposed of by the USAR in accordance with federal, state, local, and DoD requirements after closure of the Scouten USARC. The removal of these hazardous and toxic substances would result in a negligible long-term beneficial impact.

Indirect Impacts. No indirect impacts are anticipated under this alternative. Continuing maintenance activities and disposal of small quantities of remaining hazardous and toxic substances would be limited to the Scouten USARC property.

4.2.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center

Direct Impacts. Minor long-term beneficial and negligible short-term and negligible long-term adverse direct impacts would occur through the reuse of the Scouten USARC property. Under this alternative, the property would be transferred from the Army to the Mary McLeod-Bethune Intervention and Enrichment Center 'as is'. No remedial activities would be performed by the Army prior to the transfer of the property (*e.g.*, radon testing and mitigation, removal of asbestos, lead abatement). The Mary McLeod-Bethune Intervention and Enrichment Center would be notified of the elevated radon levels, the presence of ACM, and the presence of LBP. The Center would be responsible for any additional testing, abatement, and mitigation requirements as they renovate the facility for their use. The deeds transferring the property will contain covenants requiring the owners to manage lead-based paint and asbestos-containing materials in accordance with all applicable regulations. Renovation activities that would involve the removal of ACM and LBP materials would be managed and disposed of by the Center. Disposal activities would be in accordance with federal, state, local, and DoD requirements. Long-term beneficial impacts are anticipated with the proper removal of these materials from the property.

There would negligible short-term adverse direct impacts due to the potential for releases and spills that might occur during renovation. Continued operations on the property by the Mary McLeod-Bethune Intervention and Enrichment Center would result in negligible long-term adverse direct impacts due to the potential of leakage or spill of hazardous materials from vehicles parked at the facility. This includes gasoline, diesel, hydraulic fluid, motor oil, transmission fluid, and antifreeze.

Indirect Impacts. No indirect impacts are anticipated under this alternative because impacts would be limited to the Scouten USARC property.

4.3 LAND USE

4.3.1 Affected Environment

The Scouten USARC is located in Richland County, on the southeastern side of the city of Mansfield, Ohio (Figures 1-1 and 1-2). The parcel is located on the USGS 7.5-Minute Mansfield North Quadrangle map. According to the Richland County Regional Planning Commission the parcel is zoned as Multifamily Residential, though the federal government is exempt from local zoning regulations (RCRPC 2011). The parcel is located in a mixed-used area that combines commercial, industrial, and residential land uses. The parcel occupies approximately 4 acres.

4.3.1.1 Installation Land/Airspace Use

The Scouten USARC is an administrative and educational facility with limited maintenance of military vehicles occurring in the OMS building. Reservists historically used the parcel for drill activities on various weekends throughout the year. The Scouten USARC contains two permanent structures, an administration building and an OMS. A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area also are contained within the Scouten USARC parcel. Impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints cover approximately 2.2 acres of the parcel. The remaining 1.8 acres is grassed with a sparse population of trees.

4.3.1.2 Current and Future Development in the Region of Influence

According to the Richland County Regional Planning Commission there are no current or planned development projects within the vicinity of the Scouten USARC (RCRPC 2011).

4.3.2 Consequences

4.3.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of land use are anticipated. Because the Scouten USARC would not close and personnel would not be realigned; no direct impacts to land use are anticipated.

Indirect Impacts. No changes to the existing baseline conditions of land use are anticipated. Because the Scouten USARC would not close and personnel would not be realigned; no indirect impacts to land use are anticipated.

4.3.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. No direct impacts on land use are anticipated as maintenance activities are expected to continue for the current facilities. There would be no changes to land use under this alternative.

Indirect Impacts. No indirect impacts on land use are anticipated as maintenance activities are expected to continue for the current facilities. There would be no changes to land use under this alternative.

4.3.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center

Direct Impacts. There would be beneficial direct impacts to land use under this alternative. The reuse of this site would be more beneficial than leaving the property in caretaker status (i.e., Alternative 2). The proposed action would also result in beneficial use of the land for the City of Mansfield and homeless in the local area.

The 4 acres used by USARC would not change from Multifamily Residential zoning, and because Residential Districts are located adjacent to the site, the proposed developments would be similar to and would not conflict with the adjacent land uses.

Indirect Impacts. No indirect impacts on land use are anticipated as there would be no changes to land use on adjacent properties as a result of this action.

4.4 Socioeconomic Resources

4.4.1 Affected Environment

The following sections discuss the existing economic and social conditions of the Region of Influence (ROI):

- Local and regional economic activity,
- Demographics,
- Environmental justice in minority and low-income populations, and
- Protection of children from environmental health risks and safety risks.

The Scouten USARC is located within the Mansfield, Ohio Metropolitan Statistical Area (MSA). The term MSA is used to refer to an urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration with the core (OMB 2009). The Mansfield, Ohio MSA is comprised of one county, Richland County, which is anchored by the city of Mansfield. The Mansfield, Ohio MSA is the ROI for this socioeconomic analysis.

4.4.1.1 Economic Development

Local Economic Activity

Current personnel at the Scouten AFRC include 1 full time employee and 1 warrant officer. During one weekend a month, an additional 44 enlisted personnel report to the facility. Expenditures by employees would be spent in the local economy.

Regional Economic Activity

Ohio slipped from the seventh biggest state economy in 2000 to eighth in 2010 (BEA 2011). The decline in durable-goods manufacturing hit the metropolitan areas of the Great Lakes region particularly hard. Durable goods manufacturing is the highest real contributor to GDP in Ohio, and has declined from 15 percent to 10 percent of the GDP in Ohio between 2000 and 2010, and from 29 percent to 25 percent of the GDP in the Mansfield MSA between 2001 and 2008 (BEA 2011). Mansfield lost approximately 23 percent of its manufacturing jobs between 2001 and 2008 (BEA 2011). The decline in manufacturing has forced the community to diversify its economy into other sectors. The top two employers in Richland County include MedCentral Health System and Richland County Government. Civilian labor force statistics are given in Table 4-2.

Table 4-2 Annual Civilian Labor Force and Unemployment Rate, Scouten USARC Region and Larger Regions.

Jurisdiction	Change in Unemployment Rates 2005-2010	2010 Labor Force	2010 Unemployment Rate (%)
Mansfield, OH (MSA)	5.3	60,490	11.8
Ohio	4.2	5,897,559	10.1
United States	4.5	136,858,000	9.6

Source: US Department of Labor, Bureau of Labor Statistics, 2010 (BLS 2010)

Within the ROI, professional and business was the only sector to have gains in employment since 2009. All other sectors saw declines ranging from 1-9 percent or remained steady. Non-Agricultural Wage and Salary Employment by NAICS Industry for the Mansfield MSA is shown in Table 4-3.

Table 4-3 Non-Agricultural Wage and Salary Employment by NAICS Industry for the Mansfield, OH MSA (Not Seasonally Adjusted).			
Industry	**2009 Annual Average**	**2010 Annual Average**	**2008-2009 Percent Change**
Natural Resources, Mining, and Construction	1,800	1,800	0
Manufacturing	9,500	8,700	(9)
Trade, Transportation and Utilities	10,200	10,000	(2)
Financial Activities	1,700	1,700	0
Professional and Business Services	4,600	5,200	13
Education and Health Services	8,600	8,400	(2)
Leisure and Hospitality	5,000	4,900	(2)
Other Services	2,200	2,200	0
Government	8,200	8,200	0
Total	51,800	51,100	(1)
Source: Ohio Labor Market Information, Employment and Wage by Industry 2009 -2010 (OLMI 2011) ( ) Indicates a Decrease			

4.4.1.2 Demographics

Richland County (ROI) covers approximately 497 square miles with a density of 250 people per square mile. The Mansfield MSA experienced a population decline of 4 percent between 2000 and 2010. The City of Mansfield, Ohio saw a similar decline of 3 percent. In 2009, Richland County ranked 23rd out of 88 counties in Ohio for overall growth (USCB 2010). Regional and local population trends for the ROI are shown in Table 4-4.

Table 4-4 Regional and Local Population Trends, Scouten USARC Region, 1990-2020.					
Jurisdiction	**2020 Projected Population[1]**	**Percent Change 2000-2010**	**2010 Population**	**2000 Population**	**1990 Population**
Mansfield	NA	(3)	47,821	49,346	50,627
Mansfield, OH MSA	130,050	(4)	124,475	128,852	126,137
Ohio	12,005,730	2	11,536,504	11,353,140	10,847,120
United States	324,927,000	11	308,745,538	275,306,000	249,439,000

Note: Parentheses denote decrease.

[1] State of Ohio, Department of Development- MSA based on 2000 Census (ODOD 2003).

Note: Crawford County was part of the MSA in 1999 and removed in 2003.

Source: US Department of Commerce, US Census Bureau, 1990, 2000, and 2010 US Census

The population of the Mansfield MSA is aging. The baby boomer generation, those born between 1946 and 1964, are dramatically impacting populations. In the city of Mansfield, the baby boomers are approximately 28 percent of the population. Between 2000 and 2010, all age cohorts saw a decline in population except for those 50 years or older. Population trends by age for the ROI are shown in Table 4-5.

Table 4-5 Population Trends by Age, Mansfield, Ohio MSA, 1990-2020.				
Age cohort	**Percent Change 2000-2010**	**2010 Population1**	**2000 Population**	**1990 Population**
Age 0-9	(12)	15,085	17,110	17,830
Age 10-19	(11)	16,251	18,180	18,650
Age 20-29	(6)	14,530	15,400	17,830
Age 30-39	(19)	14,937	18,420	19,860
Age 40-49	(15)	17,203	20,180	16,410
Age 50-59	20	18,448	15,410	13,030
Age 60-64	31	7,761	5,920	6,160
Age 65+	50	20,260	13,560	10,890

1 US Department of Commerce, US Census Bureau, 2010

Source: State of Ohio, Department of Development - MSA based on 2000 Census (ODOD 2003).

4.4.1.3 Environmental Justice

On February 11, 1994, President Clinton issued EO 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations. The purpose of this EO is to avoid the disproportionate placement of adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as individuals or groups of individuals subject to an actual or potential health, economic, or environmental threat arising from existing or proposed federal actions and policies. Low-income, i.e., at or below the poverty threshold, for a family of four is defined as an aggregate annual mean income below $21,954 in 2009 and below $22,025 in 2008.

Table 4-6 summarizes minority and low income population for the area. According to US Census Bureau estimates, the concentration of minority individuals in the city of Mansfield (27%) is higher than the State of Ohio (17%) as well as higher than the MSA (12%). However, it is only one percent less than the average for the United States. The City of Mansfield, Ohio has nearly 19 percent of individuals at the poverty level (USCB 2009).

Table 4-6 Minority and Low-Income Populations: Scouten USARC Region and Larger Regions, 2010

Jurisdiction	Total Population	Percent Minority	Percent Black or African American	Percent American Indian/ Alaska Native	Percent Asian	Percent Native Hawaiian or Other Pacific	Percent Some Other Race	Percent Ethnicity Hispanic/ Latino	Percent of Individuals Below Poverty Level[1]
Mansfield	47,821	27	22	<1	1	<1	<1	2	19
Mansfield, OH (MSA)	124,475	12	9	<1	1	<1	<1	1	12
Ohio	11,536,504	17	12	<1	2	<1	1	3	14
United States	308,745,538	28	13	1	5	<1	6	16	14

[1] Data from US Census Bureau, American Community Survey, 2009.

Source: US Department of Commerce, US Census Bureau, 2010.

4.4.1.4 Protection of Children

On April 21, 1997, President Clinton issued *EO 13045, Protection of Children from Environmental Health Risks and Safety Risks*. This EO recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks.

It is Army policy to fully comply with EO 13045 by incorporating these concerns in decision-making processes supporting Army policies, programs, projects, and activities. In this regard, the Army ensures that it would identify, disclose, and respond to potential adverse social and environmental impacts on children within the area affected by a proposed Army action.

Within 1 mile of the Scouten USARC, there is a high school, elementary school, art academy, five city parks, one youth Boy Scout center, and a daycare center.

4.5 Consequences

4.5.1.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Scouten USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Scouten USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.5.1.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. The Scouten USARC would close and relocate to the new Armed Forces Reserve Center at Mansfield Air National Guard Base located at the Mansfield-Lahm Airport. Both of the installations are located within the Mansfield, Ohio MSA; therefore, the impacts on the ROI and regional economy would not differ from baseline conditions. The potential exists for negligible adverse impacts to businesses immediately surrounding the current facility that were used by Scouten USARC personnel.

Indirect Impacts. Under this alternative, there would be benefits foregone (short-term adverse indirect impact) from the delayed reuse of the property. The City of Mansfield would lose potential immediate economic benefits from possible employment, sales, and payment of property taxes from the reuse of the site. Potential developers of the site would lose the immediate redevelopment opportunity and potential economic benefits. Residents of the surrounding community would lose any potential immediate employment that may be created through the renovation phase and reuse of the property.

4.5.1.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center

Direct Impacts. Under Alternative 3, short-term beneficial direct economic impacts would be realized by the regional and local economy during the construction phase of the proposed reuse. Employment generated by construction activities would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies.

The Economic Impact Forecast System (EIFS) model, developed by the United States Army Corps of Engineers (USACE) Construction Engineering Research Laboratory, was used to assess the impacts of this alternative on the economy. The estimated cost of materials and supplies for the construction of the independent living accommodations under Alternative 3 is approximately $795,192 (2011 dollars). The estimated renovation period for the new facilities is 2 years. The EIFS employment and income multiplier for the ROI is 2.93.

Table 4-7 provides the estimated direct, indirect, and total annual economic impacts of renovation activities on business volume, income, and employment, as estimated by the EIFS model. These impacts would be realized over the length of the 2-year construction period. The increase in business volume, income, and employment includes capital expenditures, income, and labor directly associated with the renovation activity. Table 4-7 also provides the indirect impacts on business volume, income, and employment because of the initial direct impacts of the construction activities. It should be noted that local construction workers are expected to be utilized and non-local workers would not relocate. Appendix B contains a description of the EIFS model and the EIFS reports on impacts.

Table 4-7 Estimated Annual Economic Impacts: Alternative 3.				
Variable	**Direct Impacts**	**Indirect Impacts**	**Total**	**RTV[1]**
Annual Construction Impacts[2]				
Sales (Business) Volume	$353,524	$682,301	$1,035,825	0.03%
Income	$274,401	$130,872	$405,273	0.01%
Employment	8	4	12	0.02%

[1] Rational Threshold Value.
[2] 2011 Dollars.
Source: Economic Impact Forecast System, US Army Corps of Engineers, Construction Engineering Research Laboratory

The EIFS model also includes a Rational Threshold Value (RTV) profile used in conjunction with the forecast models to assess the degree of impacts of an activity for a specific geographic area. Appendix B contains a description of the RTV. Table 4-7 provides the RTV associated with each of the economic impacts resulting from the renovation activity. If the RTV for a variable is less than the maximum annual historic deviation for that variable, then the regional economic impacts are not considered significant. The regional positive RTVs for each economic variable are as follows: sales volume (8.77%); income (8.39%); employment (4.37%); and population (1.10%). Thus, the RTV for each of the variables was found to be considerably less than the respective regional RTV. For this reason, impacts associated with the construction would not result in substantial annual beneficial impacts.

There would be negligible short-term beneficial benefits to the economy and labor market through additional employment opportunities during the construction phase and reuse of the property. The degree of impacts would be greater if any of these positions were filled by low-income populations.

There would be moderate long-term beneficial direct impacts to elderly and low-income populations from the reuse as an independent living facility for up to 24 residents. Once construction is complete the facilities would provide services and shelter for homeless and senior individuals (age 55+). Nearly 27 percent of the population is below poverty in the city of Mansfield, which is a much higher concentration than the surrounding county (17%). Furthermore, approximately 28 percent of the population in the city of Mansfield is 55 years or older. As the baby boomers age, there will continue to be a growing need for increased services for this aging population.

There are no anticipated impacts to the safety of children. During renovation, appropriate federal and State safety measures and health regulations would be followed to protect the health and safety of all residents as well as workers. Since the project mainly consists of renovation of the building interiors, the site would not generally be accessible to children.

Indirect Impacts. Since the reuse of the site would provide a living facility for up to 24 people and would employ more personnel than the existing use, there would be negligible long-term beneficial indirect impacts to businesses from increased employee purchases and use of businesses in the area surrounding the new facility.

Short-term beneficial indirect economic impacts would be realized by the regional and local economy during the construction phase of this alternative. Employment generated by

construction activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4.7.

4.6 Cumulative Effects

The cumulative impact analysis evaluates the incremental effects of implementing any of the alternatives when added to past, present, and reasonably foreseeable future USAR actions at the Scouten USARC and the actions of other parties in the surrounding area, where applicable. The cumulative impact analysis has been prepared at a level of detail that is reasonable and appropriate to support an informed decision by the USAR in selecting a preferred alternative. The cumulative impact discussion is presented according to each of the implementation alternatives listed.

The key components of the cumulative impact analysis include the following:

- **Cumulative Impact Analysis Area.** The cumulative impact analysis area includes the area that has the potential to be affected by implementation of the proposed action at the Scouten USARC. This includes the installation and the area proximate to the installation boundary and varies by resource category being considered.
- **Past and Present Actions.** Past and present actions, other than the proposed action, are defined as actions within the cumulative analysis area under consideration that occurred before or during May 2011 (the environmental baseline for this EA). These include past and present actions at the project site and past and present demographic, land use, and development trends in the surrounding area. In most cases, the characteristics and results of these past and present actions are described in the Affected Environment sections under each of the resource categories covered in this EA.
    - The Scouten USARC is located in Richland County, in Mansfield, Ohio. The site is located in a mixed-used area that combines commercial, industrial, and residential land uses.
    - The US government acquired the 4-acre parcel in 1956 from the city of Mansfield. At the time of purchase, the property was undeveloped and vacant until construction of the administration building and OMS in 1958.
- **Reasonably Foreseeable Future Actions.** Reasonably foreseeable future actions are mainly limited to those that have been approved and that can be identified and defined with respect to timeframe and location. According to the Richland County Regional Planning Commission there are no current or planned development projects within the vicinity of the Scouten USARC (RCRPC 2011).

Because no past, present, or reasonably foreseeable future actions have been identified in the cumulative impact analysis area, no cumulative effects associated with the proposed action have been identified.

4.7 Best Management Practices

As discussed in Sections 4.1 through 4.5 above, no significant adverse or significant beneficial impacts have been identified or are anticipated as a result of implementing any of the Proposed Action alternatives or the No Action Alternative.

Local, state, and federal regulations for noise, air, water, and soil resources will be adhered to during all phases of demolition and construction, as appropriate, to minimize impacts associated with implementing the proposed action.

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5.0 FINDINGS AND CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500), and 32 CFR 651 Environmental Analysis of Army Actions. As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the each of the implementation alternatives and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a FNSI is warranted, and preparation of an EIS is not required.

Any of the alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC law (Public Laws 101-510); consequently, it has not been selected for implementation.

Alternative 3 is the preferred alternative of the Army and the LRA. This alternative would include the reuse of the facility as Independent Living Accommodations for the Homeless by the Mary McLeod-Bethune Intervention and Enrichment Center.

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6.0 LIST OF PREPARERS

This EA was prepared under the direction of the 88TH RSC and USACE. Individuals who assisted in issue resolution and provided agency guidance for this document are:

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8.0 REFERENCES

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USACE 2007	US Army Corps of Engineers, Louisville District. 2007. Final Environmental Condition of Property Report for the SSG Roy Clifton Scouten U.S. Army Reserve Center (OH037). February 2007.
USCB 2000	U.S. Census Bureau. 2000. Projections of the Resident Population by Age, Sex, Race, and Hispanic Origin: 1999 to 2100.

Citation	Description
USCB 2009	US Census Bureau. American Community Survey. 2009. Data accessed at URL: http://factfinder.census.gov. Accessed on July 21, 2011.

9.0 PERSONS CONSULTED

All information was solicited and collected from USARC installation personnel and members of the LRA (City of Mansfield) in preparation of this document.

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10.0 ACRONYMS

A

ACM Asbestos Containing Material

AFRC Armed Forces Reserve Center

AMSA Area Maintenance Support Activity

AR Army Regulation

Army US Army

AST Aboveground Storage Tank

B

BMP Best Management Practice

BRAC Base Closure and Realignment

BUSTR Bureau of Underground Storage Tank Regulations

C

CAA Clean Air Act

CEQ Council on Environmental Quality

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CFR Code of Federal Regulations

D

DoD Department of Defense

E

EA Environmental Assessment

ECOP Environmental Condition of Property

EIFS Economic Impact Forecast System

EIS Environmental Impact Statement

EO Executive Order

F

FEMA Federal Emergency Management Agency

FNSI Finding of No Significant Impact

G

H

HUD Housing and Urban Development

I

J

K

L

LBP Lead-Based Paint

LRA Local Redevelopment Authority

M

MEC Munitions and Explosives of Concern

MEP Military Equipment Parking

MSA Metropolitan Statistical Area

N

NAAQS National Ambient Air Quality Standards

NEPA National Environmental Policy Act

NFA No Further Action

NOI Notice of Intent

NRHP National Register of Historic Places

O

OMB Office of Management and Budget

OMS Organizational Maintenance Shop

OWS Oil/Water Separator

P

PCB Polychlorinated biphenyls

POL Petroleum, Oils, and Lubricants

POV Privately Owned Vehicle

Q

R

RCRA Resource Conservation and Recovery Act

ROI Region of Influence

RONA Record of Non-Applicability

RSC Regional Support Command

RTV Rational Threshold Values

S

SHPO State Historic Preservation Officer

SIP State Implementation Plan

T

TSCA Toxic Substances Control Act

U

US United States

USACE United States Army Corps of Engineers

USAR United States Army Reserve

USARC United States Army Reserve Center

USC United States Code

USEPA United States Environmental Protection Agency

USFWS United States Fish and Wildlife Service

UST Underground Storage Tanks

V

W

X

Y

Z

APPENDIX A - AGENCY COORDINATION

A.1 Initial Coordination Letters A-3
A.2 SHPO – Section 106 Consultation A-25
A.3 USFWS Consultation A-49
A.4 Agency and Public Notices A-61

Public and Agency Comments

As noted in Section 1.3, public involvement includes public comment on the draft Environmental Assessment. All agencies and organizations having a potential interest in the Proposed Action are provided the opportunity to participate in the decision making process.

The Army invites public participation in the NEPA process. Consideration of the views and information provided by all interested persons promotes open communication and enables better decision making. Agencies, organizations, Native American groups, and members of the public having a potential interest in the Proposed Action, including minority, low-income, and disadvantaged persons, are urged to participate in the NEPA process.

Per requirements specified in 40 CFR 1500-1508, the EA was available for public and agency comment for a 30-calendar-day review period (starting with the publication of the NOA) to provide agencies, organizations, and individuals with the opportunity to comment on the EA and draft FNSI. Public notices were published in local newspapers to inform the public that the EA and draft FNSI were available for review. The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and draft FNSI for review, listed public libraries where paper copies of the EA and draft FNSI could be reviewed, and advised the public that an electronic version of the EA and draft FNSI were available for download at the following Web site: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

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A.1 Initial Coordination Letters

Appendix A.1 contains the following correspondence associated with the preparation of the Environmental Assessment

Agency	Date
Letter to City of Mansfield Mayor (Initial Consultation)	June 28, 2011
Letter to Richland County Commissioners (Initial Consultation)	June 28, 2011
Letter to Mansfield Economic Development Director (LRA) (Initial Consultation)	June 28, 2011
Letter to US Department of Housing and Urban Development (Initial Consultation)	June 28, 2011
Letter to Natural Resources Conservation Service (Initial Consultation)	June 28, 2011
Letter to USEPA, Region 5 (Initial Consultation)	June 28, 2011
Letter to Ohio EPA (Initial Consultation)	June 28, 2011
Letter to Ohio Department of Development, Region 6 (Initial Consultation)	June 28, 2011
Letter to Ohio Department of Natural Resources (Initial Consultation)	June 28, 2011
Letter to Ohio DNR, Division of Natural Areas & Preserves (Initial Consultation)	June 28, 2011
Letter to Ohio DNR, Division of Wildlife (Initial Consultation)	June 28, 2011
Letter to Ohio DNR, Division of Soil & Water Resources (Initial Consultation)	June 28, 2011
Letter to Mary McLeod Bethune Intervention and Enrichment Center (Initial Consultation)	June 28, 2011
Approval letter from US Housing and Urban Development (HUD)	June 24, 2010
Response from USEPA	July 7, 2011

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PARSONS

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June 28, 2011

DONALD R. CULLIVER, MAYOR
CITY OF MANSFIELD
30 NORTH DIAMOND ST
MANSFIELD, OH 44902

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mayor Culliver:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the closure, disposal, and reuse of the Scouten USARC is to meet the requirements of the Base Realignment and Closure Act. The Scouten USARC is located at 271 Hedges Street, Mansfield, Richland County, Ohio. The site is 4 acres in size and contains two permanent structures. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Three alternatives are being considered for the proposed action and all would occur at the current location of the Scouten USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Scouten USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military mission has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

June 28, 2011

RICHLAND COUNTY COMMISSIONERS
50 PARK AVENUE EAST
MANSFIELD, OH 44902

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Commissioners:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions,* 32 CFR Part 651.

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June 28, 2011

TIM BOWERSOCK**,** ECONOMIC DEVELOPMENT DIRECTOR
MANSFIELD LOCAL REDEVELOPMENT AUTHORITY
30 NORTH DIAMOND ST
MANSFIELD, OH 44902

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mr. Bowersock:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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June 28, 2011

DOUGLAS W. SHELBY, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CLEVELAND FIELD OFFICE
U.S. BANK CENTRE BUILDING
1350 EUCLID AVE, STE 500
CLEVELAND, OH 44115-1815

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mr. Shelby:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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June 28, 2011

JASON RUHL, DISTRICT CONSERVATIONIST
NRCS MANSFIELD SERVICE CENTER
1495 WEST LONGVIEW AVE
SUITE 2058
MANSFIELD, OH 44906-1863

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mr. Ruhl:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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June 28, 2011

KEN WESTLAKE, NEPA COORDINATOR
US EPA, REGION 5
77 WEST JACKSON BLVD
CHICAGO, IL 60604-3507

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mr. Westlake:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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June 28, 2011

OHIO EPA - DIRECTOR'S OFFICE
PO BOX 1049
COLUMBUS, OH 43216-1049

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Sir/Madam:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions,* 32 CFR Part 651.

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June 28, 2011

HERMAN STINE, DIRECTOR
OHIO DEPARTMENT OF DEVELOPMENT
REGION 6 - MANSFIELD REGION
PO BOX 698
MANSFIELD, OH 44901

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mr. Stine:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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June 28, 2011

DAVID MUSTINE, DIRECTOR
OHIO DEPARTMENT OF NATURAL RESOURCES
2045 MORSE RD
COLUMBUS, OH 43229-6693

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mr. Mustine:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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June 28, 2011

CHIEF
DIVISON OF NATURAL AREAS & PRESERVES
OHIO DEPARTMENT OF NATURAL RESOURCES
2045 MORSE RD
COLUMBUS, OH 43229-6693

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

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June 28, 2011

CHIEF
DIVISION OF WILDLIFE
OHIO DEPARTMENT OF NATURAL RESOURCES
2045 MORSE RD
COLUMBUS, OH 43229-6693

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

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June 28, 2011

CHIEF
DIVISION OF SOIL & WATER RESOURCES
OHIO DEPARTMENT OF NATURAL RESOURCES
2045 MORSE RD
COLUMBUS, OH 43229-6693

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June 28, 2011

MRS. ALVERTA WILLIAMS, PRESIDENT
MARY MCLEOD-BETHUNE INTERVENTION AND ENRICHMENT CENTER
177 W 2ND ST
MANSFIELD, OH 44902

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SSG Roy Clifton Scouten US Army Reserve Center in Mansfield, Ohio.

Dear Mrs. Williams:

The United States Army Reserve 88th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SSG Roy Clifton Scouten US Army Reserve Center (Scouten USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the closure, disposal, and reuse of the Scouten USARC is to meet the requirements of the Base Realignment and Closure Act. The Scouten USARC is located at 271 Hedges Street, Mansfield, Richland County, Ohio. The site is 4 acres in size and contains two permanent structures. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Three alternatives are being considered for the proposed action and all would occur at the current location of the Scouten USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Scouten USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military mission has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

The Army's Preferred Alternative (Alternative 3) involves the closure of the Scouten USARC and subsequent transfer of the property to the Mary McLeod-Bethune Intervention and Enrichment Center. The Center would renovate and reuse the existing facilities for assisted living accommodations and supportive services for homeless seniors.

As part of the early project coordination and NEPA scoping process, we are requesting that stakeholders identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
- Available technical information regarding these issues
- Mitigation or permitting requirements that may be necessary for project implementation.

Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Lisa Gulbranson, 88th RSC, ATTN: AFRC-CMN-EN (Gulbranson), 506 Roeder Circle, Ft. Snelling, MN 55111-4009 or by email at lisa.gulbranson@usar.army.mil. If you have any questions, please contact Ms. Gulbranson at 612-713-3752.

Sincerely,

PARSONS

Richard E Hall

Mr. Richard Hall
Project Manager

Enclosures:
Figure 1: Site Location Map
Figure 2: Current Site Plan
Figure 3: Reuse Plan

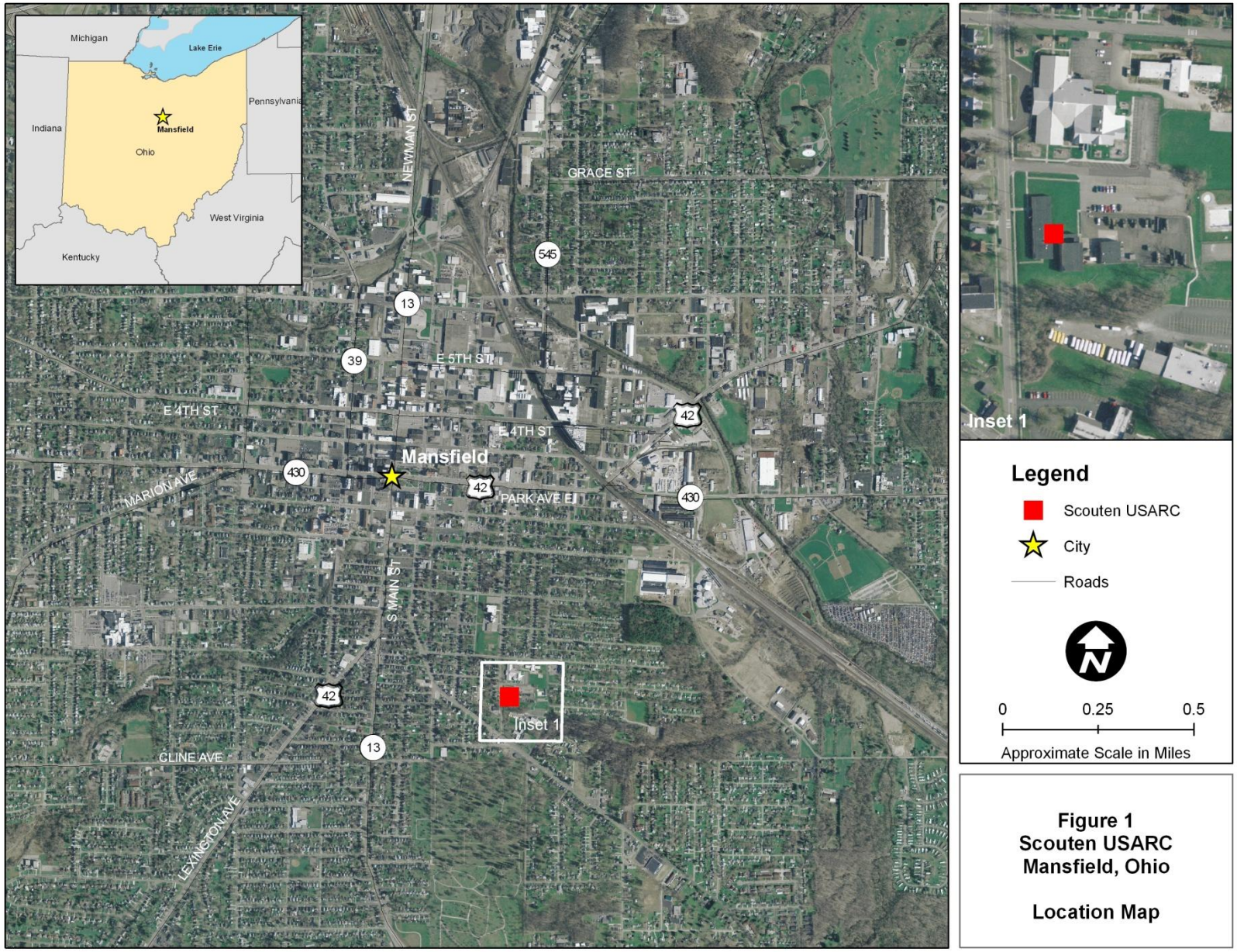


Figure 1
Scouten USARC
Mansfield, Ohio

Location Map

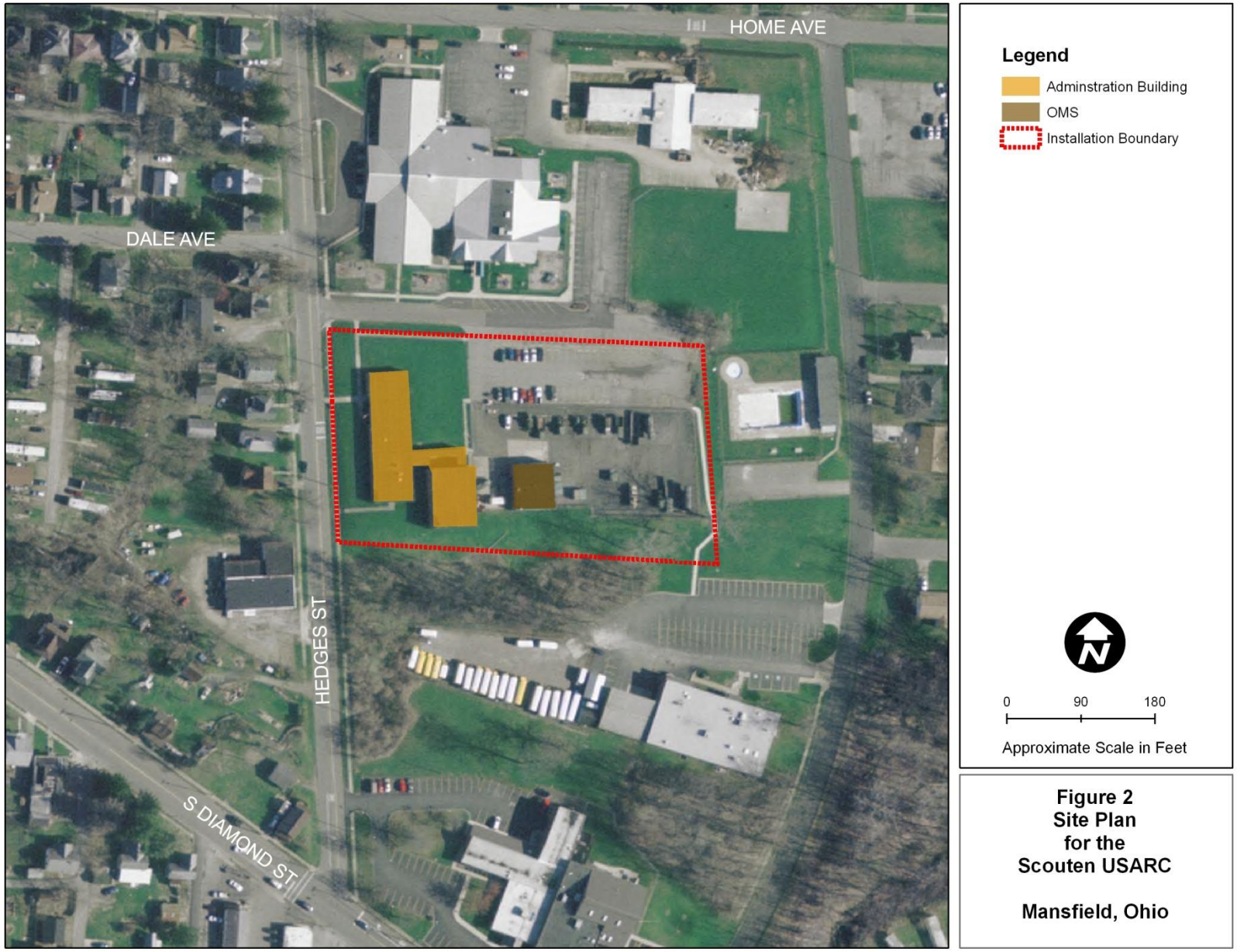
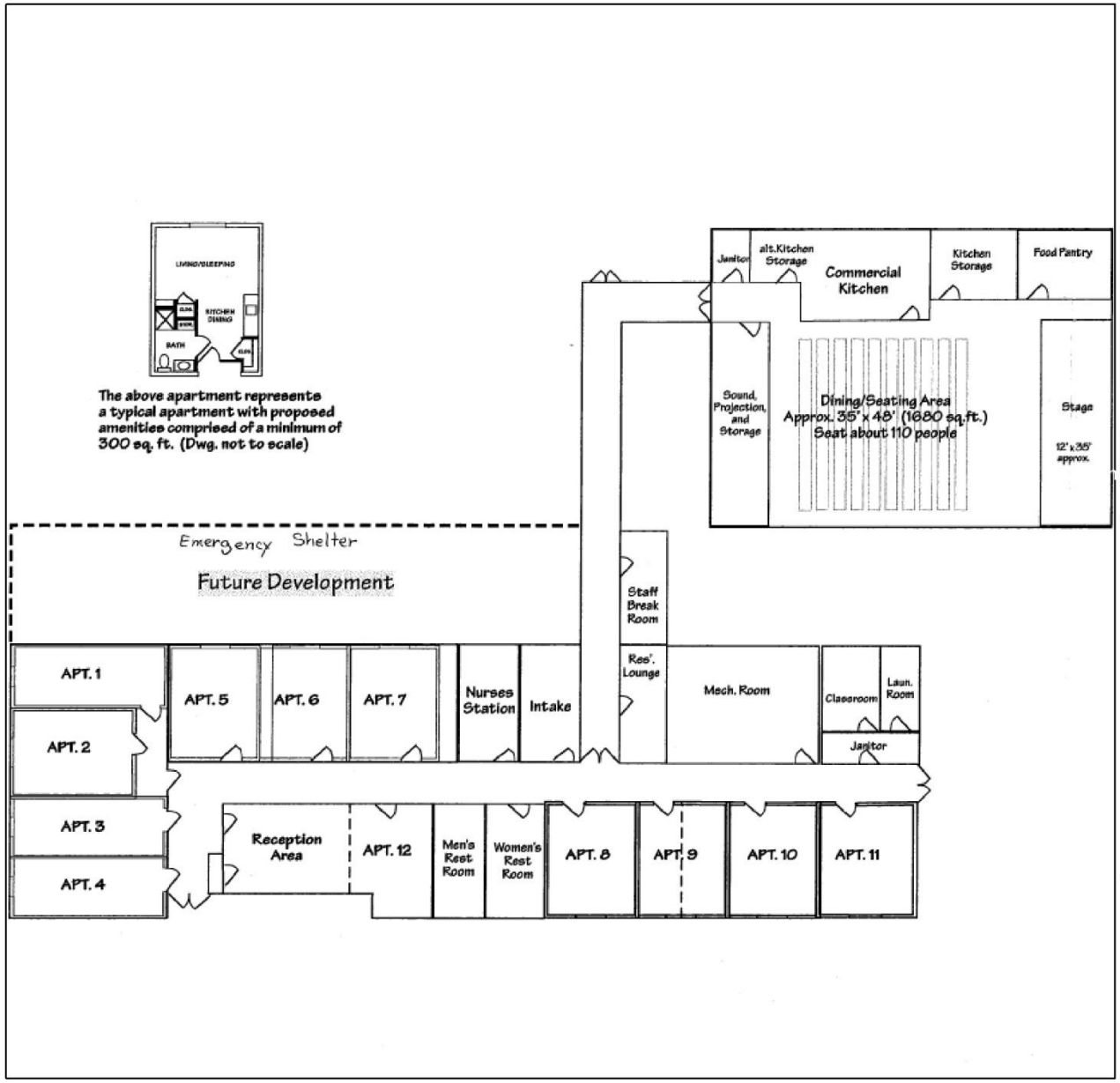


Figure 2
Site Plan
for the
Scouten USARC

Mansfield, Ohio



Proposed Renovation of the Scouten USARC for the Mary McLeod-Bethune Intervention and Enrichment Center

Assisted Living for the Homeless with Supportive Services

NOT TO SCALE

Figure 3
Reuse Plan for the Scouten USARC

Mansfield, Ohio

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

JUN 24 2010

The Honorable Donald R. Culliver
Mayor of Mansfield
30 North Diamond Street
Mansfield, OH 44902-1702

Dear Mayor Culliver:

I am pleased to inform you of the Department of Housing and Urban Development's final determination that *The City of Mansfield Local Redevelopment Authority SSG Clifton Scouten USARC Redevelopment Plan* (the Plan), dated December 20, 2007, with supplemental information dated December 8, 2009, and June 1, 2010, complies with the requirements of the Base Closure Community Redevelopment and Homeless Assistance Act (the Act) of 1994, 10 U.S.C. §2687 note, as amended, and its implementing regulations found at 24 CFR Part 586. The City of Mansfield may now move forward with implementing the reuse plan by pursuing a homeless assistance conveyance of real property for homeless assistance use. The basis for HUD's determination is discussed below.

HUD has determined that the plan appropriately balances the need of the City of Mansfield, Ohio for economic redevelopment and other development with the needs of the homeless in the community. The basis for this determination is the fact that that HUD's review of base closure plans is subject to the expressed interest and requests of representatives of the homeless. Where all Notices of Interest from representatives of the homeless are accommodated, HUD will conclude that a base reuse plan balances in an appropriate manner the needs of the community for economic and other redevelopment with the needs of the homeless in the community.

Congratulations on your success in carrying out the military base reuse planning process. I wish you continued success in implementing the SSG Clifton Scouten USARC redevelopment plan. HUD stands ready to assist you in your efforts. If the Department can provide any further service please contact Ms. Jorgelle Lawson, Community Planning and Development Director, at HUD's Columbus Field Office, 200 North High Street, Columbus, Ohio 43215-2463. Ms. Lawson may also be reached at: (614) 469-5737, ext. 8254 or Jorgelle.Lawson@hud.gov.

Sincerely,

Mark Johnston
Deputy Assistant Secretary
for Special Needs

cc:
Mr. Joseph F. Calcara, DASA (I&H)
Mr. Patrick O'Brien, OEA

www.hud.gov espanol.hud.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 07 2011

REPLY TO THE ATTENTION OF:

E-19J

Lisa Gulbranson
88th Regional Support Command
Attn: AFRC-CMN-EN (Gulbranson)
506 Roeder Circle
Fort Snelling, Minnesota 55111-4009

Re: Scoping Comments for Closure, Disposal, and Reuse of Scouten U.S. Army Reserve Center (USARC), Mansfield, Richland County, Ohio

Dear Ms. Gulbranson:

The NEPA Implementation Section has received the document listed above. Under the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act, U.S. EPA reviews and comments on major federal actions. Typically, these reviews focus on Environmental Impact Statements, but we also have the discretion to review and comment on other environmental documents prepared under NEPA, if interest and resources permit.

The document was given a cursory review, and we determined that there were no significant concerns meriting comment. EPA does, however, recommend including in the draft Environmental Assessment, any documentation relating to on-site contamination, if applicable.

Please send us future NEPA documents on this project as they become available. If you have any questions, please call Mike Sedlacek of my staff at 312-886-1765 or e-mail him at sedlacek.michael@epa.gov.

Sincerely,

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

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A.2 SHPO – Section 106 Consultation

Appendix A.2 contains the following correspondence associated with the preparation of the Environmental Assessment and coordination with the SHPO and Indian Tribes

Agency/Tribe	Date
Letter to Ohio SHPO (Initial Consultation & Determination of Eligibility)	June 5, 2006
Letter to Absentee-Shawnee Tribe of Indians of Oklahoma	June 6, 2006
Letter to Cayuga Nation of Indians	June 6, 2006
Letter to Hannahville Indian Community, Michigan	June 6, 2006
Letter to Cherokee Nation of Oklahoma	June 6, 2006
Letter to Delaware Nation	June 6, 2006
Letter to Eastern Band of Cherokee Indians	June 6, 2006
Letter to Eastern Shawnee Tribe of Oklahoma	June 6, 2006
Letter to Forest County Potawatomi Community of Wisconsin	June 6, 2006
Letter to Miami Tribe of Oklahoma	June 6, 2006
Letter to Ottawa Tribe of Oklahoma	June 6, 2006
Letter to Seneca Nation of Indians	June 6, 2006
Letter to Seneca-Cayuga Tribe of Oklahoma	June 6, 2006
Letter to Wyandotte Tribe of Oklahoma	June 6, 2006
Response from Ohio SHPO	August 14, 2006
Response from Eastern Shawnee Tribe of Oklahoma	June 14, 2006
Response from Absentee-Shawnee Tribe of Indians of Oklahoma	September 7, 2006

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

June 5, 2006

Deputy Chief of Staff Engineer

Ohio Historic Preservation Office
Resource Protection and Review
Mr. Mark Epstein, Department Head
567 East Hudson St.
Columbus, OH 43211-1030

Dear Mr. Epstein:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

Whitehall Memorial United States Army Reserve Center (USARC)
721 Country Club Road, Columbus, Ohio, 43213

SSG Roy Clifton Scouten USARC
271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58
1515 W. High Street, Springfield, Ohio, 45506

Enclosed are copies of our studies of historic structures for the above facilities that were coordinated with your office in 1997, by the Fort McCoy Archaeology Laboratory, on our behalf. (Enclosure 1) These studies were carried out pursuant to Section 110(a)(1) of the National Historic Preservation Act. None of the buildings located at the USARCs meet the criteria for the National Register of Historic Places (NRHP), under Criterion A, B, C, or D, and thus are not recommended for nomination to the NRHP. A historic documentary and architectural investigation conducted at the facilities determined there is no direct relationship between the facility and prehistoric or historic events in the Columbus, Mansfield, and Springfield areas (criterion A), there is no association with significant persons involved in prehistoric or historic events (criterion B), buildings on the facility are not architecturally or technologically significant (criterion C), and the facility is unlikely to hold future research potential (criterion D). Also, the Area of Potential Effects (APEs) do not contain any known historic or archaeological resources. According to the National Register of Historic Places, no historic properties or archaeological sites are known to exist near the APEs.

It is our determination that no historic properties will be affected by this undertaking. Pursuant to 36 CFR 800.4(a)(ii), we would appreciate your comments on our determination for

these undertakings. If we do not hear from you within thirty (30) days, we will assume that you concur with our determination and will proceed as discussed above. If you have any questions about this project, or require additional assistance, please contact Ms. Carrie Schafer at (612) 713-3825. Please address any correspondence to Ms. Schafer at the above address.

Sincerely,

DAVID L. MOORE
Environmental Division Chief

ENCL

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO
ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Absentee-Shawnee Tribe of Indians of Oklahoma
Attn: Mr. James "Lee" Edwards, Jr.
2025 South Gordon Cooper Drive
Shawnee, OK 74801-9381

Dear Governor Edwards:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

Whitehall Memorial United States Army Reserve Center (USARC)
721 Country Club Road, Columbus, Ohio, 43213

LT Jacob Parrott USARC
1025 South Main Street, Kenton, Ohio, 43326

SSG Roy Clifton Scouten USARC
271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58
1515 W. High Street, Springfield, Ohio, 45506

Enclosed are copies of our studies of historic structures for the above facilities that were conducted on our behalf by the Fort McCoy Archaeology Laboratory in 1997. The Area of Potential Effects (APEs) do not contain any known historic or archaeological resources. According to the National Register of Historic Places, no historic properties or archaeological sites are known to exist near the APEs.

Please accept this correspondence as notification, as required by The National Historic Preservation Act of 1966 (NHPA), as amended, the Archaeological Resources Protection Act of 1979 (ARPA), the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), and the Presidential Executive Order 13175 Consultation and Coordination with Indian Tribal Governments. Per the above regulations, we are assessing what information we need in order to further identify culturally affiliated properties that may be affected by our proposed closures.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Cayuga Nation of Indians
Attn: Mr. Vernon Isaac
P.O. Box 11
Versailles, NY 14168

Dear Chief Isaac:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

Whitehall Memorial United States Army Reserve Center (USARC)

721 Country Club Road, Columbus, Ohio, 43213

LT Jacob Parrott USARC

1025 South Main Street, Kenton, Ohio, 43326

SSG Roy Clifton Scouten USARC

271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO
ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Hannahville Indian Community, Michigan
Attn: Mr. Kenneth Meshiguad
N14911 Hannahville B 1 Road
Wilson, MI 49896-9728

Dear Chairperson Meshiguad:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Cherokee Nation of Oklahoma
Attn: Mr. Chadwick Smith
P.O. Box 948
Tehlequah, OK 74820

Dear Principle Chief Smith:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Delaware Nation
Attn: Mr. Bruce Gonzalez
P.O. Box 825
Anadarko, OK 73005

Dear President Gonzalez:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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1515 W. High Street, Springfield, Ohio, 45506

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Eastern Band of Cherokee Indians
Attn: Mr. Leon Jones
P.O. Box 455
Cherokee, NC 28719

Dear Principle Chief Jones:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

Whitehall Memorial United States Army Reserve Center (USARC)

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LT Jacob Parrott USARC

1025 South Main Street, Kenton, Ohio, 43326

SSG Roy Clifton Scouten USARC

271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Eastern Shawnee Tribe of Oklahoma
Attn: Mr. Charles D. Enyart
P.O. Box 350
Seneca, MO 64865

Dear Chief Enyart:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO
ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Forest County Potawatomi Community of Wisconsin
Attn: Mr. Harold Frank
P.O. Box 340
Crandon, WI 54520

Dear Chairman Frank:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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1515 W. High Street, Springfield, Ohio, 45506

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO
ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Miami Tribe of Oklahoma
Attn: Mr. Floyd Leonard
P.O. Box 1326
Miami, OK 74355

Dear Chief Leonard:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO
ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Ottawa Tribe of Oklahoma
Attn: Mr. Charles Todd
P.O. Box 110
Miami, OK 74355

Dear Chief Todd:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO
ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Seneca Nation of Indians
Attn: Mr. Cyrus Schindler
1490-Rte. 438
Irving, NY 14081

Dear President Schindler:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

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SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

Enclosed are copies of our studies of historic structures for the above facilities that were conducted on our behalf by the Fort McCoy Archaeology Laboratory in 1997. The Area of Potential Effects (APEs) do not contain any known historic or archaeological resources. According to the National Register of Historic Places, no historic properties or archaeological sites are known to exist near the APEs.

Please accept this correspondence as notification, as required by The National Historic Preservation Act of 1966 (NHPA), as amended, the Archaeological Resources Protection Act of 1979 (ARPA), the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), and the Presidential Executive Order 13175 Consultation and Coordination with Indian Tribal Governments. Per the above regulations, we are assessing what information we need in order to further identify culturally affiliated properties that may be affected by our proposed closures.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Seneca-Cayuga Tribe of Oklahoma
Attn: Mr. LeRoy Howard
P.O. Box 1283
Miami, OK 74355

Dear Chief Howard:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

Whitehall Memorial United States Army Reserve Center (USARC)

721 Country Club Road, Columbus, Ohio, 43213

LT Jacob Parrott USARC

1025 South Main Street, Kenton, Ohio, 43326

SSG Roy Clifton Scouten USARC

271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

Enclosed are copies of our studies of historic structures for the above facilities that were conducted on our behalf by the Fort McCoy Archaeology Laboratory in 1997. The Area of Potential Effects (APEs) do not contain any known historic or archaeological resources. According to the National Register of Historic Places, no historic properties or archaeological sites are known to exist near the APEs.

Please accept this correspondence as notification, as required by The National Historic Preservation Act of 1966 (NHPA), as amended, the Archaeological Resources Protection Act of 1979 (ARPA), the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), and the Presidential Executive Order 13175 Consultation and Coordination with Indian Tribal Governments. Per the above regulations, we are assessing what information we need in order to further identify culturally affiliated properties that may be affected by our proposed closures.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO ATTENTION OF:

June 6, 2006

Deputy Chief of Staff Engineer

Wyandotte Tribe of Oklahoma
Attn: Mr. Leaford Bearskin
P.O. Box 250
Wyandotte, OK 74370

Dear Chief Bearskin:

The United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

Whitehall Memorial United States Army Reserve Center (JSARC)

721 Country Club Road, Columbus, Ohio, 43213

LT Jacob Parrott USARC

1025 South Main Street, Kenton, Ohio, 43326

SSG Roy Clifton Scouten USARC

271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

Enclosed are copies of our studies of historic structures for the above facilities that were conducted on our behalf by the Fort McCoy Archaeology Laboratory in 1997. The Area of Potential Effects (APEs) do not contain any known historic or archaeological resources. According to the National Register of Historic Places, no historic properties or archaeological sites are known to exist near the APEs.

Please accept this correspondence as notification, as required by The National Historic Preservation Act of 1966 (NHPA), as amended, the Archaeological Resources Protection Act of 1979 (ARPA), the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), and the Presidential Executive Order 13175 Consultation and Coordination with Indian Tribal Governments. Per the above regulations, we are assessing what information we need in order to further identify culturally affiliated properties that may be affected by our proposed closures.

If 88th RRC activities were to impact cultural resources not previously identified, we will immediately proceed to inform you of the discovery and to invite you to assist the 88th RRC in the development of procedures for minimizing adverse impacts to the newly discovered cultural resources.

If there are specific individuals that you prefer we contact, please forward the name and method of initiating consultation with this individual, or with your designated tribal representative, traditional religious leader, or preferred NHPA point of contact. We are also contacting officials of other federally recognized tribes in Ohio to invite them to consult with us on this issue.

I look forward to working with you or your designated representative. If we do not hear from your office within 30 days, we intend to proceed with these projects. If you have any questions about these projects, or require additional assistance, please contact Ms. Carrie Schafer at (612) 713-3825 or by email at Carrie.Schafer@us.army.mil. Please address any correspondence to Ms. Schafer.

FOR THE COMMANDER

Enclosures

Thomas C.G. Helgeson
Facility Management Officer

-2-

August 14, 2006

David L. Moore
Environmental Division Chief
Department of the Army
Headquarters, 88th Regional Readiness Command
506 Roeder Circle
Fort Snelling, Minnesota 55111-4009

Dear Mr. Moore:

Re: Disposal of three facilities in Ohio

- Whitehall Memorial USARC
  721 Country Club Road, Columbus, Ohio
- SGY Roy Clifton Scouten USARC
  271 Hedges Street, Mansfield, Ohio
- SFC M.L. Downs USARC/AMSA #58
  1515 West High Street, Springfield, Ohio

This is in response to correspondence, received on June 12, 2006, regarding the above referenced project. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

The United States Army, 88th Regional Readiness Command proposes to dispose of three facilities in Ohio: Whitehall Memorial USARC in Columbus, SGY Roy Clifton Scouten USARC in Mansfield, and SFC M.L. Downs SURAC/AMSA #58 in Springfield. The facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment report.

In 1997, the Army assessed the historic significance of these facilities in accordance with Section 110(a)(1) of the National Historic Preservation Act and determined that they are not eligible for listing in the National Register of Historic Places. Therefore, the Army has determined that disposal of these facilities will not affect historic properties. Based on the information submitted, we concur with this finding.

If you have any questions, please contact me by phone at (614) 298-2000 or by e-mail at jcook@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Justin M. Cook

Justin M. Cook, History Reviews Manager
Resource Protection and Review

OHIO HISTORICAL SOCIETY
Ohio Historic Preservation Office
567 East Hudson Street, Columbus, Ohio 43211-1030 ph: 614.298.2000 fx: 614.298.2037
www.ohiohistory.org

1006708, 1006709, 1006710

Schafer, Carrie L CTR USAR RRC088 (JMWA)

From: Dorothy McCormick [dmccormick_esto@yahoo.com]
Sent: Wednesday, June 14, 2006 12:31 PM
To: Schafer, Carrie L CTR USAR RRC088 (JMWA)
Subject: USARC Base Closures: Whitehall Memorial USARC, Lt Jacob Parrott USARC, SSG Roy Clifton Scouten USARC, SFC M.L. Downs USARC./AMSA #58

June 14, 2006

To Whom It May Concern:

Thank you for notice of the referenced project(s). The Eastern Shawnee Tribe of Oklahoma is currently unaware of any documentation directly linking Indian Religious Sites to the proposed construction. In the event any items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) are discovered during construction, the Eastern Shawnee Tribe request notification and further consultation.

The Eastern Shawnee Tribe has no objection to the proposed construction. At present, the Eastern Shawnee Tribe does not wish to participate as a consulting party on the above referenced project(s). However, if any human skeletal remains and/or any objects falling under NAGPRA are uncovered during construction, the construction should stop immediately, and the appropriate persons, including state and tribal NAGPRA representatives contacted.

Sincerely,

Dorothy W. McCormick, Administrative Assistant
Eastern Shawnee Tribe of Oklahoma
127 West Oneida
P.O. Box 350
Seneca, MO 64865
918-666-2435 Phone
918-666-2186 Fax

Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
http://mail.yahoo.com

6/19/2006

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL READINESS COMMAND
506 ROEDER CIRCLE
FORT SNELLING, MINNESOTA 55111-4009

REPLY TO
ATTENTION OF:

September 7, 2006

Deputy Chief of Staff Engineer

Absentee-Shawnee Tribe of Indians of Oklahoma
Attn: Karen Kaniatobe, Tribal Historic Preservation Officer
2025 South Gordon Cooper Drive
Shawnee, OK 74801-9381

Dear Ms. Kaniatobe:

Per previous correspondence dated June 6, 2006, the United States Army Reserve, 88th Regional Readiness Command (RRC) has determined that that the following facilities will be closed pursuant to the 2005 Defense Base Closure and Realignment (BRAC) report:

Whitehall Memorial United States Army Reserve Center (USARC)

721 Country Club Road, Columbus, Ohio, 43213

LT Jacob Parrott USARC

1025 South Main Street, Kenton, Ohio, 43326

SSG Roy Clifton Scouten USARC

271 Hedges Street, Mansfield, Ohio, 44903

SFC M.L. Downs USARC/AMSA #58

1515 W. High Street, Springfield, Ohio, 45506

Based on our studies of historic structures for the above facilities, the 88th RRC determined that the Area of Potential Effects (APEs) do not contain any known historic or archaeological resources. According to the National Register of Historic Places, no historic properties or archaeological sites are known to exist near the APEs. [Enclosure 1]

In an email dated July 7, 2006 you requested additional information concerning the BRAC 2005 Closures in Ohio. Your concerns, as I understand them are: (1) The future treatment of inadvertent discoveries and (2) The rationale for requiring no archeological survey on these facilities.

First, please note that a once a tract of land has left Federal ownership, any inadvertent discoveries encountered would come under Ohio Burial laws. Specifically, these laws are cited as Ohio Revised Code (ORC) 1.59 (K) which defines cemetery as

including American Indian burial objects placed with or containing American Indian human remains, ORC 2909.05 Vandalism, and ORC 2927.11 Desecration. In addition, in efforts to further identify any concerns, the listed facilities were assessed for the potential for archeological sites. An archeologist who met the Secretary of Interior's Standards evaluated/assessed maps, photographs, and aerial imagery of the facilities in question and determined that an archeological survey was not required due to the near total involvement of each with buildings and parking lots within the property. Disturbance during the construction of these facilities was felt to have virtually eliminated any sites once potentially present. Other 88th RRC Ohio facilities not so disturbed have been archeologically surveyed.

The Army Reserve appreciates your response and assistance to ensure that that the most comprehensive review possible is conducted on proposed actions. If you have any questions about these projects, or require additional information, please contact Ms. Carrie Schafer at (612) 713-3825 or by email at Carrie.Schafer@us.army.mil. Please address any correspondence to Ms. Schafer.

Sincerely,

DAVID L. MOORE
Environmental Division Chief

Enclosures

-2-

Schafer, Carrie L CTR USAR RRC088 (JMWA)

From: Karen Kaniatobe [kkaniatobe@astribe.com]
Sent: Friday, July 07, 2006 4:22 PM
To: Schafer, Carrie L CTR USAR RRC088 (JMWA)
Subject: 88th Regional Readiness Command (RRC) Base Closures

Ms Schafer:

We appreciate the fact that you understand the lines of communication necessary to resolve Section 106 and NAGPRA issues.

Though we have discovered quite a bit about the Shawnee presence in Ohio we are stilll in the process of identifying places that would be of the most importance to the Absentee Shawnee people. This is why we are very concerned about the four military facilities (Whitehall Memorial United States Army Reservae Center/721 Country Club Rd, Columbus, Ohio 43213; Lt Jacob Parrott USARC/1025 S Main Street, Kenton, Ohio 43326; SSG Rog Clifton Scouten USARC/271 Hedges Street, Mansfield, Ohio 44903; SFC ML Downs USARC/AMSA #58/1414 W High St, Springfield, Ohio 45506) being closed. Presently any inadvertent discoveries uncovered during ground disturbing activities on these properties are protected under federal law. Once these properties are transferred into private ownership then we are dependent on the good will of the new owners. Though you report that no sites exist within the APE you do not state how much of each facility was surveyed to conclude this statement.

We request that language be included in any transfer of sale document that any inadvertent discoveries will remain in situ.

It may be that even with every inch of the ground surveyed there would no inadvertent discovery. This is our hope anyway.

We thank you for notifying us of this project and your sensitivity towards our concerns. Should you have any future inquiries please direct them to Karen Kaniatobe, Tribal Historic Preservation Officer. Additionally to cut down on paperwork please deliver via e-mail: kkaniatobe@astribe.com Thank you.

Karen Kaniatobe, Tribal Historic Preservation Officer
2025 S Gordon Cooper
Shawnee Oklahoma 74801
Phone: 405.275.4030 x199
Fax: 405.878.4711
Website: www.absenteeshawneetribe-nsn.gov

ENCL. 2

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A.3 USFWS Consultation

Appendix A.3 contains the following correspondence with USFWS associated with the preparation of the Environmental Assessment.

Correspondence	Date
Memorandum for Record – Scouten Listed Species Determination of No Effect	26 August 2011
Natural Resource Survey Report	2008
USFWS Ohio Endangered Species List	January 2011

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ARRC-SWI-EN 26 August 2011

MEMORANDUM FOR RECORD

SUBJECT: OH037 SSG Roy Clifton Scouten US Army Reserve Center, Mansfield, Ohio
Listed Species Determination of No Effect

1. The US Army Reserve (USAR) 88th Regional Support Command, based on a decision by the Base Closure and Realignment Commission (BRAC), proposes to dispose of the existing SSG Roy Clifton Scouten US Army Reserve Center (USARC) located at 271 Hedges Street in Mansfield, Ohio 44903. The facility will be transferred (via public benefit conveyance) to the Mary McLeod-Bethune Intervention and Enrichment Center for use as independent living accommodations and supportive services for homeless seniors.

The facility is approximately 4 acres in size, hereafter it is referred to as the "Property". The Property is currently used as an Army Reserve Center and Organizational Maintenance Shop repair facility. The Property location is at the following approximate coordinates: 40.75 N, -82.51 W. The facility is surrounded by mixed residential and institutional land.

2. To begin Endangered Species Act - Section 7 documentation, the 88th Regional Support Command (RSC) completed a Natural Resource Survey of the property (BHE Environmental) in 2007 to identify whether any listed threatened/endangered species and sensitive habitats are present on the property. The Natural Resource Survey included a review of the US Fish and Wildlife Service (USFWS) database (http://www.fws.gov/midwest/endangered/lists/ohio-cty.html).

Federal Listed Species Richland County, Ohio

Richland	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests

RSC staff carefully reviewed the U.S. Fish and Wildlife technical assistance website again on 16 August 2011, for federally listed threatened and endangered species (see attached). According to the USFWS website, in Richland County, Ohio, the Indiana bat is the only federally endangered listed for the county.

No suitable habitat for this species is present on or adjacent to the nearly fully developed Property site.

SUBJECT: OH037 SSG Roy Clifton Scouten US Army Reserve Center, Mansfield, Ohio
Section 7 Listed Species Determination of No Effect

3. The site survey in 2008 determined that no wetlands were present on or adjacent to the site. No species-specific protection measures are planned at this time due to the lack of known federal threatened, endangered or candidate species and/or potentially suitable habitat on the Property.

4. Previous phone conversations with Ms. Megan Seymour, Ecological Services, USFWS Ohio Field Office (614) 416-8993 ext. 16, have indicated that based on similar project findings, the USFWS does not require review of our determination nor their concurrence in writing. They do recommend a Memorandum for Record be filed in our office documenting the determination. This document fulfils that request.

With the above information, in conformance with 50 CFR 402, the 88th RSC determines that the proposed actions will have "no effect" to Federally listed species or proposed listed species under the mandates of Section 7(a)(2) of the Endangered Species Act of 1973, as amended.

5. If you have any questions about this determination, or require additional information, please contact Environmental Protection Specialist – Natural Resources, Mr. Marshal Braman 612-713-3470 or via email at marshal.braman@us.army.mil.

Sincerely,

David L. Moore
Chief, Public Works- Environmental Division

Encl

Cc: Ms. Megan Seymour USFWS

2

OH037 - SSG Roy Clifton Scouten USARC

USARC 88th RSC Natural Resources Fact Sheet

Facility Location Information

FACID	OH037	**Site Code**	39895	**State**	Ohio	**County**	Richland
Facility Name	SSG Roy Clifton Scouten USARC	**LAT**	40.75 N	**GIS Acreage Calculation**	4.00		
Address	271 Hedges Street	**LONG**	-82.51 W	**Real Property Report Acres**	4.00		
City/State/Zip	Mansfield, OH 44903			**USGS Quad**	Mansfield North, Mansfield South		
Facility Type	USARC/OMS/DS	**Survey Type**	◉ Desktop	**Land Survey**	S27 T21N R18W		
Facility POC	Paulette Horning-Sanford		○ Field	**State Region**	Northwestern		
Phone	(419) 525-1893			**Survey Date**	2008		
Ownership	The 88th RSC owns the land and 2 buildings that compose OH037.						

Land Use

On-site Land Use	56% improved areas including paved parking and buildings. Remaining 44% is maintained grass areas.
Surrounding Land Use	Surrounded by mixed residential and institutional land.

Water Resources

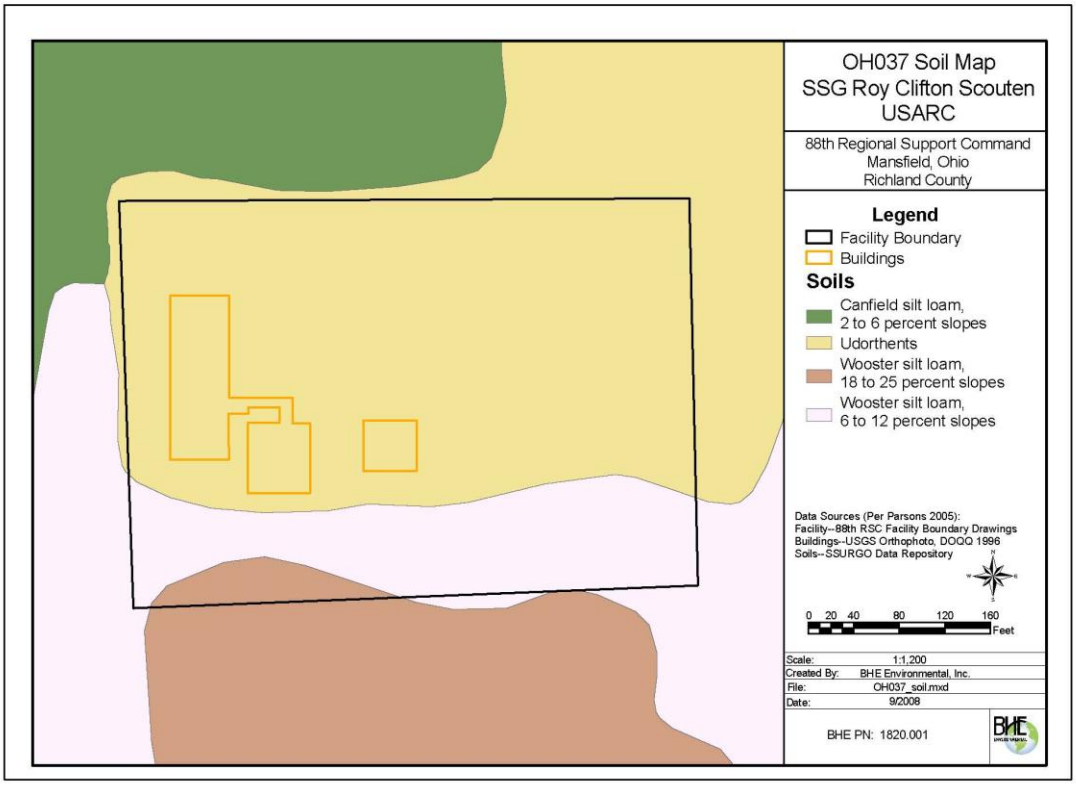
Watershed	Mohican River.		
Floodplains	None.		
On-site Surface Water	None.		
Off-site Surface Water	According to NWI data, there are no surface waters within 1,000 ft of the site.		
Stormwater Basins	None.	**SWB Size**	N/A.
On-site Wetlands	None according to NWI.		
Off-site Wetlands	According to NWI data, there are no wetlands within 1,000 ft of the site.		

Biological Resources	
On-site Listed Species	None reported by ODNR.
On-site Potential Listed Species Habitat	None.
State-listed Species Within 1,000 ft of Facility	None reported by ODNR.
Federally Listed Species in County	Indiana bat (E).
Vegetation Communities/Land Cover	7% buildings, 44% maintained grass, and 49% paved road/parking.
Potential Convertible Lawn	1.75 ac.

Geological Resources		
Groundwater Depth	1. 24 in.; 2. >72 in.; 3. >72 in.; 4. >72 in.	
Geologic Formation	Mississippian.	
	Approx Depth to Bedrock	1. 15 to 28 in.; 2. >60 in.; 3. 20 to 30 in.; 4. 20 to 30 in.
	Pollution Sensitivity	1. moderately high; 2. No data available; 3. moderately high; 4. moderately high.
Soil Types/Association	1. Canfield silt loam, 2-6% slopes; 2. Udorthents; 3. Wooster silt loam, 6-12% slopes; 4. Wooster silt loam, 18-25% slopes.	
Topography	Relatively flat site at 1,220 - 1,230 ft amsl.	

Other Sensitive Resources	
On-site Resources	None.
Off-site Resources	None.

OH037 Facility Map
SSG Roy Clifton Scouten
USARC
88th Regional Support Command
Mansfield, Ohio
Richland County
Legend
Buildings
Facility Boundary
Data Sources (Per Parsons 2005):
Facility--88th RSC Facility Boundary Drawings
Buildings--USGS Orthophoto, DOQQ 1996
Streets--TIGER Data 2000
Streams and Lakes--USGS, NHD
Wetlands--USFWS, NWI
Wetlands--Ohio DNR OWI
Flood Zones--FEMA Q3
0 100 200 400 600 800
Feet
Scale: 1:4,800
Created By: Parsons
File: OH037_Facility.mxd
Date: 3/2005
BHE PN: 1820.001
Arch St
Greenlawn Ave
Jeanette Ave
Flint St
Adams St
Mason St
Remy Ave
Educational Pl
Foster St
Home Ave
Dale Ave
Hedges St
Greendale Ave
Diamond St
Fair St
Cleveland Ave
Ford St
Luther St
Beethoven St


OH037 Soil Map
SSG Roy Clifton Scouten
USARC
88th Regional Support Command
Mansfield, Ohio
Richland County
Legend
Facility Boundary
Buildings
Soils
Canfield silt loam, 2 to 6 percent slopes
Udorthents
Wooster silt loam, 18 to 25 percent slopes
Wooster silt loam, 6 to 12 percent slopes
Data Sources (Per Parsons 2005):
Facility--88th RSC Facility Boundary Drawings
Buildings--USGS Orthophoto, DOQQ 1996
Soils--SSURGO Data Repository
0 20 40 80 120 160
Feet
Scale: 1:1,200
Created By: BHE Environmental, Inc.
File: OH037_soil.mxd
Date: 9/2008
BHE PN: 1820.001

OH037 Land Cover Map
SSG Roy Clifton Scouten
USARC
88th Regional Readiness Command
Mansfield, Ohio
Richland County
Legend
Facility Boundary
Land Cover
Buildings
Maintained Grass
Paved Road/Parking
Data Sources (Per Parsons 2005):
Facility--88th RRC Facility Boundary Drawings
Buildings--USGS Orthophoto, DOQQ 1996
Streets--TIGER Data 2000
Streams and Lakes--USGS, NHD
Wetlands--USFWS, NWI
Wetlands--Ohio DNR OWI
Flood Zones--FEMA Q3
0 50 100 200 300 400
Feet
Scale: 1:2,400
Created By: Parsons
File: OH037_LandCover.mxd
Date: 3/2005
BHE PN: 1820.001
Home Ave
Parsons St
Dale Ave
Dale Ave
Hedges St
Greendale Ave
Cleveland Ave
Diamond St
Diamond St

County Distribution of Ohio's Federally Threatened, Endangered, Proposed and Candidate Species

For more information about threatened and endangered species in Ohio, contact:
U.S. Fish & Wildlife Service
4625 Morse Road, Suite 104
Columbus, OH 43230
or phone (614) 416-8993

Revised January 2011

State	County[1]	Species	Status	Habitat
Ohio	Adams	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
Ohio	Adams	Fanshell mussel *(Cyprogenia stegaria)* (=C. irrorata)	Endangered	Found in areas of packed sand and gravel at locations in a good current
Ohio	Adams	Pink mucket pearly mussel *(Lampsilis abrupta)* *(= L. orbiculata)*	Endangered	The lower Ohio River and its larger tributaries
Ohio	Adams	Rayed bean mussel (*Villosa fabalis*)	Proposed as Endangered	Smaller, headwater creeks, but they are sometimes found in large rivers
Ohio	Adams	Sheepnose mussel (*Plethobasus cyphyus*)	Proposed as Endangered	Shallow areas in larger rivers and streams
Ohio	Adams	Snuffbox (*Epioblasma triquetra*)	Proposed as Endangered	Small to medium-sized creeks in areas with a swift current and some larger rivers
Ohio	Adams	Running buffalo clover *(Trifolium stoloniferum)*	Endangered	Disturbed bottomland meadows; disturbed sites that have shade during part of each day
Ohio	Allen	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
Ohio	Allen	Rayed bean mussel (*Villosa fabalis*)	Proposed as Endangered	Smaller, headwater creeks, but they are sometimes found in large rivers
Ohio	Ashland	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests

State	County[1]	Species	Status	Habitat
Ohio	Preble	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
Ohio	Preble	Eastern massasauga (*Sistrurus catenatus*)	Candidate	Wetlands and adjacent uplands
Ohio	Preble	Rayed bean mussel (*Villosa fabalis*)	Proposed as Endangered	Smaller, headwater creeks, but they are sometimes found in large rivers
Ohio	Putnam	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
Ohio	Putnam	Rayed bean mussel (*Villosa fabalis*)	Proposed as Endangered	Smaller, headwater creeks, but they are sometimes found in large rivers
Ohio	Richland	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
Ohio	Ross	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
Ohio	Ross	Clubshell mussel *(Pleurobema clava)*	Endangered	Found in coarse sand and gravel areas of runs and riffles within streams and small rivers
Ohio	Ross	Northern riffleshell mussel *(Epioblasma torulosa rangiana*)	Endangered	Large streams and small rivers in firm sand of riffle areas; also occurs in Lake Erie
Ohio	Ross	Rayed bean mussel (*Villosa fabalis*)	Proposed as Endangered	Smaller, headwater creeks, but they are sometimes found in large rivers
Ohio	Ross	Snuffbox (*Epioblasma triquetra*)	Proposed as Endangered	Small to medium-sized creeks in areas with a swift current and some larger rivers
Ohio	Sandusky	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests

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A.4 Agency and Public Notices

Per requirements specified in 32 CFR Part 651.4, a 30-calendar-day review period (starting with the publication of the NOA) was established to provide all agencies, organizations, and individuals with the opportunity to comment on the EA and FNSI. A NOA was published in local and regional newspapers to inform the public that the EA and FNSI were available for review. The newspapers were:

- Mansfield News Journal
- Cleveland Plain Dealer

The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and FNSI for review, listed where paper copies of the EA and FNSI could be reviewed, and advised the public that an electronic version of the EA and FNSI were available for download at the following Web site: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

The EA was available for public review and comment at the following libraries:

- Mansfield/Richland County Public Libraries – Main Library
- Mansfield/Richland County Public Libraries – Crestview Branch

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APPENDIX B – EIFS REPORT

Introduction

The EIFS model provides a systematic method for evaluating the regional socioeconomic effects of government actions, particularly military actions. Using employment and income multipliers developed with a comprehensive regional/local database combined with economic export base techniques, the EIFS model estimates the regional economic impacts in terms of changes in employment generated, changes in population, and expenditures directly and indirectly resulting from project construction. The EIFS model evaluates economic impacts in terms of regional change in business volume, employment and personal income, and expenditures for local and regional services, materials, and supplies. Although the EIFS model does not provide an exact measure of actual dollar amounts, it does offer an accurate relative comparison of alternatives.

The EIFS model also includes a Rational Threshold Value (RTV) profile used in conjunction with the forecast models to assess the degree of the impacts of an activity for a specific geographic area. For each variable (business volume, employment, income, and population), the current time-series data available from the United States Bureau of Economic Analysis are calculated along with the annual change, deviation from the average annual change, and the percent deviation for each of these variables, which then defines a threshold for important annual regional economic impacts for a variable. Within the EIFS model, the RTV is calculated for each of these variables when assessing the regional economic impacts of a specific project. If the RTV for a particular variable associated with the impacts of a specific project exceeds the maximum annual historic deviation for that variable, then the economic impacts are considered significant. If the RTV for a variable is less than the maximum annual historic deviation for that variable, then the regional economic impacts are not considered significant.

The basis of the EIFS analytical capabilities is the calculation of multipliers used to estimate the impacts resulting from BRAC-related changes in local expenditures or employment. The forecast inputs for the EIFS are as follows. It is assumed 60 percent of hard construction costs reflect materials and supplies; 30 percent for labor, and 10 percent for profit/overhead. The input for construction cost for changes in local expenditures is 60 percent of hard construction costs divided by 2 years. The change in employment is determined by finding the 30 percent labor number and then dividing by the Bureau of Labor Statistics Wages by area and occupation for construction and extraction workers in the Richland County, Ohio. The following are the EIFS output data for construction and the Rational Threshold Value (RTV) for the Region of Influence (ROI) of Alternative 3.

EIFS REPORT

PROJECT NAME

BRAC EA- Scouten - Alternative 3

STUDY AREA

39139 Richland, OH

FORECAST INPUT

Change In Local Expenditures	$238,558
Change In Civilian Employment	6
Average Income of Affected Civilian	$40,710
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	$0
Percent of Militart Living On-post	0

FORECAST OUTPUT

Employment Multiplier	2.93	
Income Multiplier	2.93	
Sales Volume - Direct	$353,524	
Sales Volume - Induced	$682,301	
Sales Volume - Total	$1,035,825	0.03%
Income - Direct	$274,401	
Income - Induced)	$130,872	
Income - Total(place of work)	$405,273	0.01%
Employment - Direct	8	
Employment - Induced	4	
Employment - Total	12	0.02%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	8.77 %	8.39 %	4.37 %	1.1 %
Negative RTV	-8.43 %	-6.04 %	-4.27 %	-0.51 %

APPENDIX C – LEGAL AND REGULATORY FRAMEWORK FOR BRAC CLOSURE, DISPOSAL, AND REUSE PROCESS

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the Scouten USARC in Mansfield, Ohio. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission made the following recommendations concerning the Scouten USARC:

> "Close the Scouten Army Reserve Center, Mansfield, OH, and the Parrott Army Reserve Center, Kenton, OH, and relocate all units to a new AFRC at Mansfield Air National Guard Base located at Mansfield-Lahm Airport. The new AFRC shall have the capability to accommodate units from the following facilities: Ohio ARNG Armories in Mansfield and Ashland, OH, if the state decides to relocate those National Guard units."

To implement these recommendations, the Army proposes to close the Scouten USARC.

The law that governs real property disposal is the Federal Property and Administrative Services Act of 1949 (40 U.S.C., Sections 471 and following, as amended). This law is implemented by the Federal Property Management Regulations at Title 41 CFR Subpart 101-47. The disposal process is also governed by 32 CFR Part 174 (Revitalizing Base Closure Communities) and 32 CFR Part 175 (Revitalizing Base Closure Communities—Base Closure Community Assistance), regulations issued by DoD to implement BRAC law, and matters known as the Pryor Amendment and the President's Program to Revitalize Base Closure Communities.

Relevant Statutes and Executive Orders

A decision on how to proceed with the Proposed Action rests on numerous factors such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations, the Army is guided by relevant statutes (and their implementing regulations) and Executive Orders (EO) that establish standards and provide guidance on environmental and natural resources management and planning. These include the Clean Air Act, Clean Water Act, Noise Control Act, Endangered Species Act, National Historic Preservation Act, Archaeological Resources Protection Act, Resource Conservation and Recovery Act, and Toxic Substances Control Act. EOs bearing on the Proposed Action include:

EO 11988 (Floodplain Management)

EO 11990 (Protection of Wetlands)

EO 12088 (Federal Compliance with Pollution Control Standards)

EO 12580 (Superfund Implementation)

EO 12873 (Federal Acquisition, Recycling and Waste Prevention)

EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations)

EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks)

EO 13175 (Consultation and Coordination with Indian Tribal Governments)

EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds)

EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management)

These authorities are addressed in various sections throughout this EA when relevant to particular environmental resources and conditions. The full texts of the laws, regulations, and EOs are available on the Defense Environmental Network & Information Exchange website at http://www.denix.osd.mil.

Other Reuse Regulations and Guidance

DoD's Office of Economic Adjustment published its Community Guide to Base Reuse in May 1995. The guide describes the base closure and reuse processes that have been designed to help with local economic recovery and summarizes the many assistance programs administered by DoD and other agencies. DoD published its DoD Base Reuse Implementation Manual to serve as a handbook for the successful execution of reuse plans. DoD and the US Department of Housing and Urban Development have published guidance (32 CFR Part 175) required by Title XXIX of the National Defense Authorization Act for Fiscal Year 1994. The guidance establishes policy and procedures, assigns responsibilities, and delegates authority to implement the President's Program to Revitalize Base Closure Communities (July 2, 1993), as endorsed through Congressional enactment of the Pryor Amendment

APPENDIX D – SELECTED COMPONENTS OF THE SCOUTEN USARC REUSE PLAN

Appendix D contains the following components associated with reuse of the Scouten USARC

Document	Date
US Department of Housing and Urban Development Reuse Approval Letter	June 24, 2010
Agreement between the City of Mansfield and the Mary McLeod-Bethune Intervention and Enrichment Center	June 1, 2010
Mary McLeod-Bethune Intervention and Enrichment Center Assisted Living Proposed Programs	N/A
Mary McLeod-Bethune Intervention and Enrichment Center Assisted Living Project Budget and First Year Projections	N/A

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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

JUN 24 2010

The Honorable Donald R. Culliver
Mayor of Mansfield
30 North Diamond Street
Mansfield, OH 44902-1702

Dear Mayor Culliver:

I am pleased to inform you of the Department of Housing and Urban Development's final determination that *The City of Mansfield Local Redevelopment Authority SSG Clifton Scouten USARC Redevelopment Plan* (the Plan), dated December 20, 2007, with supplemental information dated December 8, 2009, and June 1, 2010, complies with the requirements of the Base Closure Community Redevelopment and Homeless Assistance Act (the Act) of 1994, 10 U.S.C. §2687 note, as amended, and its implementing regulations found at 24 CFR Part 586. The City of Mansfield may now move forward with implementing the reuse plan by pursuing a homeless assistance conveyance of real property for homeless assistance use. The basis for HUD's determination is discussed below.

HUD has determined that the plan appropriately balances the need of the City of Mansfield, Ohio for economic redevelopment and other development with the needs of the homeless in the community. The basis for this determination is the fact that that HUD's review of base closure plans is subject to the expressed interest and requests of representatives of the homeless. Where all Notices of Interest from representatives of the homeless are accommodated, HUD will conclude that a base reuse plan balances in an appropriate manner the needs of the community for economic and other redevelopment with the needs of the homeless in the community.

Congratulations on your success in carrying out the military base reuse planning process. I wish you continued success in implementing the SSG Clifton Scouten USARC redevelopment plan. HUD stands ready to assist you in your efforts. If the Department can provide any further service please contact Ms. Jorgelle Lawson, Community Planning and Development Director, at HUD's Columbus Field Office, 200 North High Street, Columbus, Ohio 43215-2463. Ms. Lawson may also be reached at: (614) 469-5737, ext. 8254 or Jorgelle.Lawson@hud.gov.

Sincerely,

Mark Johnston
Deputy Assistant Secretary
for Special Needs

cc:
Mr. Joseph F. Calcara, DASA (I&H)
Mr. Patrick O'Brien, OEA

www.hud.gov espanol.hud.gov

City of Mansfield, Ohio
30 N. Diamond St. Mansfield, OH 44902

David L. Remy
Law Director

DATE: June 1, 2010

TO: United State Department of Defense - [BRAC]

FROM: David L. Remy, Law Director

RE: SSG Roy Clifton Scouten United States Army Reserve Center
271 Hedges Street, Mansfield, Oh 44902

In my capacity as Law Director for the City of Mansfield, Ohio, I have examined the proposed Agreement between the City of Mansfield and the Mary McLeod-Bethune Intervention and Enrichment Center relating to the use of the SSG Roy Clifton Scouten United States Army Reserve Center at 271 Hedges Street, Mansfield, Richland County, Ohio as a facility for providing services and shelter to the homeless. Based upon my review, it is my opinion that this Agreement will be and does constitute legal, valid, binding and enforceable obligations on the parties after execution by the duly authorized representative of each entity.

Sincerely,

David L. Remy
Law Director

Civil Division 419/755-9659 • Criminal Division 419/755-9651 • Victim Services 419/755-9667
FAX 419/755-9697 FAX 419/755-9491

AGREEMENT

BETWEEN

CITY OF MANSFIELD

AND

MARY McLEOD-BETHUNE INTERVENTION AND ENRICHMENT CENTER

I. THE PARTIES

THIS AGREEMENT is made on the 1st day of June, 2010 (the "Approval Date"), by and between the CITY OF MANSFIELD, OHIO, a municipal corporation duly organized and operating under its Charter and the laws of the State of Ohio, acting by and through its LOCAL REDEVELOPMENT AUTHORITY (hereafter the "LRA"), with offices at 30 North Diamond Street, Mansfield, Ohio 44902 (Telephone Number: (419) 755-9794; Fax Number: (419) 755-9465), and THE MARY McLEOD-BETHUNE INTERVENTION AND ENRICHMENT CENTER, a non-profit corporation organized and operating under the laws of the State of Ohio (hereafter the "CENTER"), with its principal office being at 177 West Second Street, Mansfield, Ohio 44902 (Telephone Number: (419) 522-6712; Fax Number: (419) 522-6712). This Agreement become effective upon the date the last official whose signature is required signs this document.

II. RECITALS

WHEREAS, the LRA was created in accordance with the Military Base Reuse Act as adopted and amended through a Resolution (Resolution No. 06-177) by the Mansfield City Council on August 1, 2006 for the purpose of planning the redevelopment of the SSG Roy Clifton Scouten United States Army Reserve Center (hereafter the "USARC"); and

WHEREAS, the United States of America is the fee owner of the USARC property located at 271 Hedges Street in the City of Mansfield, Richland County, Ohio, and also known as Permanent Parcel No. 027-06-500-19-000; and

WHEREAS, the USARC located in the City of Mansfield has been declared a surplus property as noted in the Federal Register (Volume 71, No. 181) on Tuesday, September 19, 2006; and

WHEREAS, the LRA has submitted to the United States Department of Housing and Urban Development (hereinafter the "DEPARTMENT") for review and approval a redevelopment plan which proposes to redevelop the USARC property and building situated thereon to provide assisted

1

living accommodations for the homeless with supportive services focused on those individuals who have lost their homes and are in need of temporary housing until such time as they are approved for permanent housing (hereinafter the "PLAN"). The PLAN is based upon the redevelopment plan submitted by the CENTER, which was received by the LRA on January 26, 2007.

III. TERMS OF THE AGREEMENT

1. Upon approval of the PLAN by the DEPARTMENT, the USARC property shall be transferred to the CENTER, with said property to be used and developed for use by the CENTER solely as a facility to provide services and shelter for the homeless as defined in the McKinney-Vento Homeless Assistance Act under 42 U.S.C. Section 11302, consisting of twelve (12) units of housing within the City of Mansfield, Ohio, all in accordance with the PLAN prepared and submitted by the the LRA to the DEPARTMENT, which PLAN is incorporated herein by reference. Said PLAN describes the suitability and renovations needed to provide such facilities and the funding required for such use, which includes initial bank funding to be repaid from such sources as Mansfield Metropolitan Housing (tenant subsidies and various grant funding, such as Community Block Grant fund, HOME funds, and Rental Rehabilitation Program funding through the LRA. (See attached information).

2. All renovations performed by the CENTER to the USARC building shall be in compliance with the Ohio Building Code as adopted by Chapter 1311 of the Mansfield Codified Ordinances, as amended. The renovations will utilize the entire USARC Building (13,566 Square feet of space), and consist of twelve apartments (300 Square feet each), a reception area, a nurse's station, an intake office, men's and women's restrooms, a resident lounge, a classroom, a staff break room, a laundry room, a mechanic's room, and a janitor's room. The parties acknowledge, in the event alterative arrangements are required, (1) that the property necessary to replace the USARC for the persons proposed to be served would be equivalent to the foregoing, and (2) that the LRA has no obligation to pay for the replacement or to provide the CENTER funds for another property.

3. Upon approval of the PLAN by the DEPARTMENT and the transfer of the fee ownership of the USARC property to the CENTER, the CENTER shall promptly and with diligence proceed to develop and renovate said property solely for use as a facility providing services and shelter for the homeless within the City of Mansfield, Ohio. In the event the PLAN is not approved by the DEPARTMENT, this Agreement shall be null and void.

4. In the event an environmental analysis conducted under 32 CFR Section 176.45(b) indicates that the USARC property is not suitable for the intended purpose of providing services and shelter for the homeless, the LRA and the CENTER shall negotiate alternative arrangements for the CENTER to provide such services and shelter for the homeless within the City of Mansfield.

5. In the further event that the fee ownership of the USARC property is transferred to the CENTER, and the CENTER fails to complete the renovations to the USARC building and commence use said property for assisted living accommodations for the homeless as described in

the PLAN on or before twenty-four (24) months after this Agreement is executed by both parties, or after commencing such use, discontinues to provide such services on said property, the USARC property shall revert to the City of Mansfield, Ohio, and the CENTER shall cooperate and execute any and all documents necessary to effect such transfer/reversion. If such reversion of the USARC property to the City of Mansfield occurs, the LRA will use its best efforts to obtain another homeless assistance providers to carry out this project.

6. Unless earlier terminated under the provisions of this Agreement, the CENTER shall perform its services of providing assisted living accommodations for the homeless with supportive services as described herein and in the PLAN for a period of ten (10) years commencing in 2013 and expiring in 2023, unless mutually extended. The deed conveying the USARC property to the CENTER shall contain a provision restricting the use of said property to the provision of housing and services to homeless persons for at least the term set forth in this paragraph.

7. In connection with this Agreement, the LRA represents that the USARC property is currently provided with police and fire protection through the City of Mansfield, with water and sanitary sewer services through infrastructure owned and operated by the City of Mansfield (except for the services lines located on the subject property), with electric services provided by Ohio Edison Company, and with natural gas provided by Columbia Gas of Ohio.

8. This Agreement supercedes all prior discussion and negotiations between the parties, and the rights and obligations set forth herein shall inure to the benefit of, and be binding against the parties hereto and their respective successors and permitted assigns. This Agreement shall be amended or modified only by a written document executed by the parties hereto.

9. The base closure and disposition must comply with the Defense Base Closure and Realignment Act of 1990, as amended, and its implementing regulations (Base Closure Act).

IV. SIGNATURES

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed by their duly authorized representatives on the day and year first above written.

Witnesses:

THE MARY McLEOD-BETHUNE INTERVENTION AND ENRICHMENT CENTER

By Alverta L. Williams
Alverta L. Williams
Its President

3

CITY OF MANSFIELD, OHIO

Christa K. Pirc

By _____
Phil Messer
Its Service-Safety Director

This Agreement was prepared by
the Mansfield Law Director's Office.

4

Financial Support

The following programs and activities are available to assist with the redevelopment of the facility. The funding requests will be a collaboration with the Mary McLeod-Bethune Intervention and Enrichment Center, the LRA, the City of Mansfield, the Richland County Commissioners, State, and Federal Agencies.

1) Mansfield Metropolitan Housing Authority (MMHA)-
   Rental payment subsidies.

2) City of Mansfield—Community Development
   A) CDBG funds
   B) Rental Rehabilitation Program
   C) HOME Funding

3) CHDO—State Tax Credit Housing Program
4) Job & Family Services/One Stop
5) Fair Housing Law Enforcement—City of Mansfield Fair Housing
6) Ohio Finance Fund
7) State of Ohio Link Deposit Program

Ohio Directory of Services and Assistance

The COHHIO Directory of Services lists more than 900 nonprofit housing agencies and services that help prevent homelessness in Ohio. Organized alphabetically by county, this quick reference guide provides user-friendly information to help people avoid homelessness and find affordable housing. The directory is used by nonprofit organizations, churches and community groups working on the front lines in Ohio communities.

To update or add an entry, please contact **Tom Betti** at 614-280-1984, x15

State Links

Community Development Finance Fund
42 East Gay Street, Suite 1000
Columbus, Ohio 43215
614/221-1114; 614/221-7493 (fax)
www.financefund.org

Corporation for Supportive Housing
40 West Long Street
Columbus, OH 43215
614/228-6263; 614/228-8997 (fax)
oh@csh.org

Governor of Ohio, Bob Taft
77 South High Street, 30th Floor
Columbus, Ohio 43266
614/466-3555, 614/466-9354 (fax)
ohio.gov/

Ohio Association of ADAMHs Boards
42 East Gay Street, Suite 904
Columbus, Ohio 43215
614/224-1111; 614/224-2642 (fax)
www.netwalk.com/~adamhs/adamhs.htm

Ohio Association of Nonprofit Organizations
42 East Gay Street, Suite 1000
Columbus, Ohio 43215-3119
614/280-0233; 614/280-0657 (fax)
www.ohiononprofits.org

Ohio Capital Corporation for Housing
88 East Broad Street, Suite 1800
Columbus, Ohio 43215
614-224-8446; 614-224-8452 (fax)
www.occh.org

Ohio CDC Association
35 East Gay Street, Suite 400
Columbus, Ohio 43215
614/461-6392; 614/461-1011 (fax)
www.ohiocdc.org

Ohio United Way
88 East Broad Street, Suite 620
Columbus, Ohio 43215
614/224-8146
614/224-6597 (fax)
www.ouw.org

State of Ohio
www.state.oh.us
(contact information for state agencies, elected officials, legislators, and the Governor)

National Links

Center for Community Change
1000 Wisconsin Avenue, NW
Washington, DC 20007
202/342-5462; 202/333-5462 (fax)
www.communitychange.org

Corporation for Supportive Housing
50 Broadway, 17th Floor
New York, NY 10004
212/986-2966; 212/986-6552 (fax)
www.csh.org

Enterprise Foundation
10227 Wincopin Circle, Suite 500
Columbiana, Maryland 21044
410/964-1230, 410/964-1918 (fax)
www.enterprisefoundation.org

Housing Assistance Council
1025 Vermont Avenue, NW, Suite 606
Washington, DC 20005
202/842-8600; 202/347-3441 (fax)
www.ruralhome.org

Housing Trust Fund Project
1113 Cougar Court
Frazier Park, California 93225
805/245-0318; 805/245-2518 (fax)

National Alliance to End Homelessness
1612 K Street, NW, Suite 1004
Washington, DC 20006
202/775-1322; 202/775-1316 (fax)
www.endhomelessness.org

National Coalition for the Homeless
1012 14th Street, NW #600
Washington, DC 2005-3406
202/737-6444; 202/737-6445 (fax)
www.nationalhomeless.org

Ohio Conference on Community Development
PO Box 986
Cuyahoga Falls, Ohio 44223
330/923-0265 (phone & fax)
www.occd.org

Ohio Department of Alcohol and Drug Addiction Services
280 North High Street, 12th Floor
Columbus, Ohio 43215-2537
614/466-3445, 614/752-8645 (fax)
www.state.oh.us/ada/odada.htm

Office of Housing and Community Partnerships,
Ohio Department of Development
77 South High Street
Columbus, Ohio 43266
614/466-2285; 614/752-4575 (fax)
www.odod.state.oh.us/cdd/ohcp

Ohio Housing Finance Agency,
Ohio Department of Development
57 East Main Street
Columbus, Ohio 43215-5135
614/466-7970, 614/644-5393 (fax), TDD 614/466-1940
www.odod.state.oh.us/ohfa

Ohio Department of Job and Family Services
30 East Broad Street
Columbus, Ohio 43266-0423
614/752-9701, 614/466-1504 (fax)
www.ifs.ohio.gov/

Ohio Department of Mental Health
30 East Broad Street
Columbus, Ohio 43266-0414
614/466-2596, 614/466-6349 (fax)
www.mh.state.oh.us

Ohio House of Representatives
77 South High Street
Columbus, Ohio 43266
www.house.state.oh.us

Ohio Housing Authorities Conference
Corporate Office
PO Box 1029
Marietta, Ohio 44901-1029
419/524-9116, 419/524-1535 (fax)
www.ohac.com

Ohio Senate
Statehouse
Columbus, Ohio 43215
www.senate.state.oh.us

National Community Reinvestment Coalition
727 15th Street, NW, Suite 900
Washington, D.C. 20005
202/628-8866, 202/628-9800 (fax)
www.ncrc.org

National Congress for Community Economic Development
1030 15th Street, NW, Suite 325
Washington, DC 20005
202/289-9020; 202/289-7051 (fax)
www.ncced.org

National Law Center on Homelessness and Poverty
1411 K Street, NW, Suite 1400
Washington, DC 20005
202/638-2535; 202/628-2737 (fax)
www.nlchp.org

National Low Income Housing Coalition
1012 14th Street, NW, #610
Washington, DC 20005
202/662-1530; 202/393-1973 (fax)
www.nlihc.org

Shelterforce, National Housing Institute
439 Main Street, Suite 311
Orange, NJ 07050
973/678-9060; 973/678-8437 (fax)
nhi@nhi.org; www.nhi.org

USDA Rural Development
1400 Independence Avenue, SW
Washington, DC 20250
202/690-1533; 202/690-0500 (fax)
www.rurdev.usda.gov

USDA Rural Development - Ohio office
200 North High Street, Room 507
Columbus, Ohio 43215
614/469-5606, 614/469-5756 (fax)
www.rurdev.usda.gov/oh/index.html

U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, DC 21410
202/708-3600, 202/708-2580 (fax)
Washington, DC
www.hud.gov
www.hud.gov/renting/ - HUD's Renter's Kit

U.S. Department of Housing and Urban Development - Cincinnati office
15 East Seventh Street, Fifth Floor
Cincinnati, Ohio 45202

513/684-3451, 513/684-6224 (fax)
www.hud.gov/local/cin

U.S. Department of Housing and Urban Development - Cleveland office
1350 Euclid Avenue, Suite 500
Cleveland, Ohio 44115-1815
216/522-4058, 216/522-2975 (fax)
www.hud.gov/local/cle

U.S. Department of Housing and Urban Development - Columbus office
200 North High Street
Columbus, Ohio 43215
614/469-5737, 614/469-2237 (fax)
www.hud.gov/local/cib

U.S. House of Representatives
Washington, DC 20515
202/225-3121

U.S. Senate
Washington, DC 20510
202/224-3121

White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500
202/456-1414, 202/456-2461 (fax)
www.whitehouse.gov

PROPOSED PROGRAM

Mary McLeod-Bethune Intervention & Enrichment Center (MBIE) proposes to redevelop the SSG Roy Clifton Scouten USARC installation, located at 271 Hedges Street, Mansfield, Ohio 44902, Richland County, into assisted living accommodations for the homeless. Also we will provide permanent housing with a component which includes supportive services. We will focus on people who have lost their homes and those who are in need of temporary housing until they are approved for permanent housing.

These plans coincide with those of the new State Administration as stated on their website: "We know that supportive housing that is permanent with services to help people become healthy and employable is more cost-effective and humane..."

CENSUS TRACT 3 PROFILE

With corridor linkages with businesses, agencies, churches and recreational facilities, we will pursue the economic revitalization of Census Tract 3 which includes some of the oldest developed areas in the City of Mansfield, Richland County. It is characterized by narrow parcels and housing densities based on foot traffic. This tract has been the setting for a number of Habitat for Humanity homes as well as other renewal. Target areas are Hedges, Cleveland, Dale, Home, Remy, Foster, Mason, Greendale, Jeanette, Glenn and Educational Streets, the areas from where the majority of students come to attend Hedges Elementary School.

There are serious gaps in the social services and educational delivery systems to students and families in Census Tract 3. Hedges Elementary failed to meet the achievement levels on the 4th grade proficiency test in past years. It has been reported that at Hedges Elementary, about 66% of the third graders failed to pass the third grade mathematics achievement test; 51% failed the science portion. Fourth grade students' reading achievement dropped from 22.2% to 8.6% in 1997-1998. Ohio's state average at that time was 48.3%.

Hedges Elementary's census tract area has the highest birth rates in the community, according to the Mansfield-Richland County Health Department and also has one of the largest health risk population in Richland County. Of the 2,566 citizens who live in this census tract, 56.2% are African American. The median income here is $13,182, one of the lowest income areas in Richland County. Census data reflect that 41.4% of families live below the federal poverty level in this area.

Mansfield, Ohio Profile

Mansfield, Ohio, the county seat for Richland County, is located in north central Ohio, 79 miles southwest of Cleveland and 65 miles northeast of Columbus. Mansfield has a population of 51,600 with 24.5% of persons under age 18. Children younger than 18 average 26.8% and 25.8% of children ages 5-17 live in households with incomes below the federal poverty level. Single family households average 26.4% of households in Mansfield. Of these households, 2,793 are headed by a female householder with no spouse/father present and 610 are headed by a male householder with no spouse/mother present.

Mansfield City School District Profile

The Mansfield City Schools is an urban school district serving about 6,500 students and their families, Data reflects that 67% of the students come from low-income backgrounds. Student statistics reflect that 70% of the students are Caucasian, of which 33% evolve from a strong Appalachian culture. The Caucasian population also includes many families with strong ethnic heritage traces to German, Italian and Slavic nationalities. About 36% o the students are African American and 31% are from middle income families. Less than one percent of the student population is Spanish American and Oriental. About 25% of the student population qualifies for aid to dependent children. The percentage of African Americans in Richland who live below the poverty level is 26%.

STRENGTH TOGETHER OVERCOMES POVERTY (STOP)
HEDGES STREET AND CENSUS TRACT 3 REVITALIZATION PLAN

PURPOSE AND OBJECTIVES

Planned intervention for redevelopment of the Hedges neighborhood will positively affect the future of this target area. We have adopted a comprehensive approach to identify census tract problems that will require a consolidated community effort. Information from past needs assessments by the city, social and human service agencies, community and institutional organizations, area residents, youth groups and neighborhood schools will be evaluated. Census data and mapping will be acquired from the Regional Planning Commission and neighborhood meetings will be held.

A collaborative group will summarize the data and identify issues, complete a strategic plan and determine a timetable for realistic neighborhood intervention. Many of the programs in the strategic plan will be "wrapped around" existing successful programs and indicators to measure program outcomes will be established.

The Mary McLeod-Bethune Villa will solidify public/private partnerships and dedication and commitment will given to a planning process that would help eliminate physical and social deterioration of targeted neighborhoods. At this time, existing coalitions and programs broad enough to cope with urban blight need help in addressing the distressed areas of the Hedges street area. Studies will be done, planning workshops and meetings will be held that include local residents, business owners, representatives of local institutions and public entities. The overall goal is to decide neighborhood strengths, weaknesses and explore solutions. From this public/private cooperation, a

master plan for redeveloping the neighborhoods will be formulated to be the backbone of STOP: Strength Together Overcomes Poverty.

The mission of Strength Together Overcomes Poverty (STOP) is to expand and strengthen the partnerships in the Mansfield community and to revitalize our targeted urban neighborhoods.

STOP has the following principles:

1. To continue collaboration with essential private/public partners to help improve the the quality of life in targeted neighborhoods.

2. To build a believable image of targeted neighborhoods and include the residents in developing the broad base support that will help effect the changes.

3. To deal simultaneously with the social, economic and physical aspects of the affected neighborhoods and continually recognize their mutual support for each other.

4. To maintain realization and understanding of how one system relates and relies on another. Because of past collaborations with health entities, we now know wrap-around delivery of services must be implemented. We now know that infant mortality has everything to do with prenatal care, the home environment, health care, nutrition, financial stability and healthy parents.

5. To use physical development as an opportunity to instill positive social change and create new jobs for neighborhood residents by employing them to revitalize their neighborhoods.

6. To maintain a unified process of planning so that the affected neighborhoods can see results from the planning process. The objective is to involve the residents in this specific project, including them in the decision-making process, empowering them to change their lives and become self-sustaining.

Our total goal in redeveloping this blighted neighborhood is to stop poverty and improve the quality of life. By eliminating the poverty, there will be provision for decent housing, suitable living conditions and an expansion of economic opportunities for low and moderate income persons. The cost of revitalizing neighborhoods is much less than the cost of building new neighborhoods. The implementation of STOP and its strategic plan will show how residents in aging neighborhoods can use public/private partnerships to reinvest in their community, become empowered, self-sufficient, self-sustaining, improve their healthcare and eliminate homelessness.

STRATEGIC PLAN

The strategic plan of Strength Together Overcomes Poverty will not only identify the needs and concerns of the inner city neighborhoods but will also include a physical plan to revitalize the neighborhoods' life support systems by continuing the collaboration process within the community to address needs and concerns..

The strategic plan will be an umbrella and embrace existing successful programs of the targeted neighborhoods.

THE HEDGES STREET NEIGHBORHOOD

There's parking lots across from houses that need repair. There are dilapidated houses a short distance from there that should be demolished and other houses that only need transformation to become suitable for a homeless family. It is a neglected

Neighborhood. It's a dream, slowly unfolding, that contains the hope for reviving. Here, kids still need more help to complete their education; health hazards and old housing endangerment need eliminated. The residents are poor, at-risk, homeless, need more healthcare and community services and the environment continues to poison their existence. The STOP program can plant seeds that will bring forth flowers, beautiful gardens, bright new playgrounds and hope for the future. This will become a compassionate neighborhood, full of life, healthy green trees aligned down the sidewalks in front of homes ready to be lived in.

The Mary McLeod-Bethune Villa proposes to be the center of this neighborhood's revitalization. It will once again successfully grow its future generations of youth and families and be able to take care of the ones who already live there.

OUR LEGACY

Children are given to us like packets of flower seeds, with no pictures on the cover and no guarantees. We don't know what they will look like, act like or what potential they will have. Our job, like a gardener, is to respond to their needs and give them proper nourishment, love, attention and care. The same goes for neighborhoods.

Positive family environments can generate successful and memorable experiences, activate potential and set positive values. This helps form healthy values that nourish inner gifts and talents. Whereas, parents and positive families serve as guideposts, negative family environments can produce paralyzing experiences and stress that shut down potential and freeze up the ability to learn, love and live a happy productive life. In millions of families across America, one or both parents are crippled by emotional problems including alcoholism, drug dependence, domestic violence, chronic rage, anxiety and depression. Without positive guidance and involvement, these family systems are on a collision course with disadvantage, despair dysfunction. We desire to ignite their hope, so that their lives will shine and leave a brighter legacy to future generations.

ASSISTED LIVING

Our assisted living component, the Mary McLeod-Bethune Villa, will be a residential option for seniors who want or need accommodations because of coming to a place in their life where they need personalized assistance and healthcare in a professionally managed environment. They might require some help in daily activities such as bathing, dressing and medication monitoring. Assisted living is a service that gives comfort, safety and peace of mind to a senior and their relatives when they realize that professional assistance in a residential setting is appropriate. Assisted living is an alternative to nursing care. Nursing facilities provide patients with skilled nursing care for illnesses or conditions that require constant medical attention.

The Mary McLeod-Bethune Villa will offer a floor plan to meet the needs of the assisted living resident. They will also be able to bring personal items from their previous homes. Each apartment or suite will feature carpet, window treatments, private bath with a walk-in shower, storage space, individually controlled heating, air conditioning units and an optional fully equipped kitchenette. All utilities will be included in their monthly payment except the telephone. The residents will also have the choice of dining with others in the Villa's formal dining. Meals can be charged to their residence or paid for in advance.

Residents will be offered specialized services that will help them live a comfortable lifestyle.

SPECIALIZED SERVICES

* Beauty and Barer Services
* Respite Care
* Physical Therapy Services
* Occupational Therapy Services
* Three well-balanced meals per day
* Nurses on duty seven days a week
* Independent Living Option
* Medication Assistance
* Wellness /Nutrition Programs
* Housekeeping and Laundry Services
* Scheduled Transportation
* Recreational and Social Activities
* Personal Care Assistance
* In Suite Emergency Response System

HOUSING PROGRAMS

The Villa Project has a unique integration of programs designed specifically fo the purpose of enabling clients to become self-sufficient. The project will integrate assisted living, residential and supportive housing to meet the multiple needs of the homeless population.

Supportive Housing provides a supportive environment and includes a planned service component designed as part of the Continuum of Care strategy. There is development of the housing and supportive services to assist homeless persons transition from homelessness and enable themselves to live independently. Assistance is provided to help participants meet the goals of achieving (1) residential stability; (2) increasing their skill levels and incomes and (3) obtaining greater self-determination and more influence over decisions that affect their lives.

Shelter Plus Care includes grant funding for rental assistance for homeless persons with disabilities and involves tenant, sponsor, project and single room occupancy rental assistance.

Emergency Shelter is designed to help provide essential social services to homeless individuals and to help them become self-sufficient within a permanent residence.

Specific Performance Measurements

Specific performance measures for each of these goals have been established based on the needs and characteristics of the homeless and at-risk populations to be served. Clients will be monitored for progress in meeting their performance measures on an ongoing basis. Record keeping and evaluation will be maintained, as well as progress reports. The progress reports will include questions of self-assessment from the client in meeting their self-sufficiency. They will also be asked how they can make changes in their performance to achieve greater success within a given timeline.

Expanded Community

The Mary McLeod-Bethune Villa will be a thriving community within its campus; but residents will also be able to participate in activities in Mansfield and Richland County. They will also have the opportunity to travel to Columbus, Cleveland and other cities within our radius.

The residents will be able to visit local restaurants, shops and parks and become involved in local social clubs, volunteer organizations, churches, schools and government. Residents will also have the opportunity to organize outings to take advantage of the proximity or other metropolitan areas, like Columbus, Cleveland, Akron, Canton, their surrounding suburbs and shopping/entertainment areas.

Continuum of Care

The Continuum of Care concept will be utilized at the Villa and will successfully combine the resident's active independent life with medical care and other helpful services they might need in the future. The Continuum of Care concept is an important part of making residents feel secure about not having to move again. The concept is structured to meet the residents' changing needs. On site services and facilities can be utilized for health care. Local health care professionals and facilities will be readily accessible.

Some services will be contracted through businesses and agencies in the city and Richland County. Medicaid, medicare, social security, pensions, social security disability, insurance and other income sources, as approved, will also be considered.

HOME CARE SERVICES

The Villa will also offer Home Care. This service will encompass a broad array of health care and social services provided to individuals and their families in their home or other residential setting. The design of our Home Care component will encompass services related to medical needs or personal care or social needs. The medically related services or "home health care" will consist of home visits by health professionals only. Those professionals would be nurses, physical therapists, occupational therapists or professional plus a paraprofessional "home health aide" to provide assistance. For medically related home health care, there will be a plan of care prescribed by a physician and the care provided in the home will be supervised by a professional, usually a nurse. Medical services provided in the home will include giving oral medication, injections, dressing changes and other nursing treatments, teaching the patient and the family and other assistance.

Personal care and social services will be "home care." These services will include assistance by a "personal care aide" or "home health aide" with direct personal needs such as bathing, dressing and grooming. Other services will include help with shopping, cooking and cleaning.

EMERGENCY SHELTER PROGRAM

Our programs will provide assistance to individuals who are homeless or in need of other housing assistance as a result of fleeing a situation of domestic violence, and for whom emergency shelter services or other crisis intervention services are unavailable or insufficient.

Financial resources will be used for short-term housing assistance, including rental or utilities payments assistance and assistance with related expenses such as payment of security deposits and other costs incidental to relocation housing. Support services will be designed to enable individuals who are avoiding domestic violence to locate and secure permanent housing and integrate into a community.

Services provided will be transportation, counseling, child care services, case management, employment counseling, and other assistance. Prevention activities will include support services such as mentoring, job training, childcare, literacy education, services for older individuals, outreach to individuals with disabilities and innovative approaches to improve the emergency shelter program.

Objective: To strengthen community partnerships to decrease homelessness in Richland County and to enhance the county's capacity to prevent homelessness.

Performance Measures:
1. Number of persons served
2. Number of support services provided.

Outreach Services and Programs

Vocational Assessment/Evaluation

This service provides an appraisal of a person's aptitudes, interests, and abilities in various areas of job performance through the collection, organization and analysis of information obtained from work records, tests, and interviews.

Vocational Guidance and Counseling

This service aids individuals in overcoming problems pertaining to employment or related to working situations. It assists people in resolving interpersonal conflicts in their work settings; fosters changes in attitudes, values, and perspectives, which interfere in obtaining and/or retaining employment or improving employment status or satisfaction. Counseling may be on a one-to-one or on a group basis.

Job Readiness

Job Readiness helps individuals to learn the basic tools for obtaining employment suitable to their particular skills and talents. It may include advice pertaining to some or all of the following: (1) resume preparations (2) dress and personal appearance; (3) filling out applications and writing letters applying for a job or responding to a job ad; (4) interview techniques; (5) taking employment tests; and (6) general orientation to occupational choices. The activities may operateon a one-to-one basis or on a group basis.

JOB PLACEMENT AND REFERRAL

This service assists individuals in obtaining paid employment by matching the particular skills, talents, and capabilities of a job seeker with the particular skills, talents, and capabilities demanded in a job vacancy. The referral component of the service may include

directing a job seeker, after evaluation, to some special program where he/she might have an opportunity to improve his/her employability. Elements may include appraisal of interests, capacities, and talents through testing and test evaluation, referral of the job seeker to selected employers for a mutual assessment of employment prospects, and employment-related advice and guidance. Various employment registries and job banks are utilized to aid the placement and referral program.

EMPLOYMENT/VOCATIONAL TRAINING SERVICES

Job Training

This service prepares individuals for specific types of employment opportunities by means of instruction in the performance of specific skills or execution of designated tasks. it may include recruitment of instructors, instructional materials, supplies or equipment, and adequate facilities. The definition covers activities know as internship, apprenticeship, and in-service or on-the-job training.

Work Activity/Adjustment

This service arranges work-type activities for persons who are unemployed or unemployable. It does not emphasize paid employment, but rather provides opportunities for achieving the satisfaction and sense of accomplishment derived from doing something worthwhile. The activities afford opportunities to appreciate work for its own sake, for development (physical, social, psychological) achieved through the accomplishment of work tasks.

Sheltered Employment

This service arranges a controlled and protected working environment and paid employment activities with individualized goals to assist persons to progress toward productive vocational status. Elements may include: (1) diagnostic evaluation and testing' (2) controlled and supervised working experience for training, work adjustment or employment in conjunction with other services, such as counseling and group therapy; and (3) assessment of progress, referral, and follow-up. For the most part, the program is geared, on a long-term basis, for the handicapped and/or elderly persons who are not employable, alcoholics, and other socially maladjusted persons who need a Job during the period of readjustment to the community.

INCOME MAINTENANCE SERVICES

GENERAL FINANCIAL ASSISTANCE

This service encompasses a variety of programs designed to provide case income or vouchers on a regular basis to individuals and families in need. The various programs under these services, entailing a means test, are income-related or gap-filling case payments or vouchers designed to bridge all or part of the gap between an established target standard of living and the individual's or family's available resources. Also included in this service category are financial aid programs of voluntary agencies. Examples of programs are AFDC, General Assistance, Supplemental Security Income (SSI), Food Stamps, Utilities Assistance grants.

EMERGENCY FINANCIAL ASSISTANCE

Emergency Financial Assistance is designed to provide financial assistance to individuals

or families to help them during times of personal emergency and crisis to secure food, clothing, shelter, medical care, utilities and home furnishings. Assistance is available directly to the recipient or protective payee/guardian. This service may also include "one-time" financial assistance.

MEDICAL SERVICES ASSISTANCE WITH APPLICATIONS

This service encompasses those programs which are concerned with the provision of financial aid to individuals who are unable to purchase health care because of their economic conditions. Programs may include: Medicare, Medicaid, Private Carriers, Prepaid Health Plans, and Pharmaceutical Services which provide assistance in meeting medical bills for individuals such as the elderly, disabled and those having low-income.

HEALTH RELATED SCREENING AND/OR EVALUATION

Health related screening and/or evaluation provides screening and evaluation to individuals or groups in order to maintain their adequate physical functioning by early detection of any diseases or impairments, or to determine their capabilities relative to specific life goals (e.g., vocational). It includes general physical, speech, hearing, and vision screening and/or evaluation, and referral to health providers after screening and evaluation.

OUTPATIENT MEDICAL CARE ASSISTANCE

Outpatient medical care provides diagnostic and specialty treatment services to individuals suffering from illness, injury, or physical conditions which require skilled care, but do not require overnight hospitalization, It includes private physicians, and specialty and community health centers/clinics that provide such services as orthopedics, pediatrics, obstetrics, neurology, geriatrics, dietetics, physical medicine, surgery (minor) and radiology.

PRENATAL HEALTH SERVICES ASSISTANCE

Prenatal health services provide for maternity care including regular examinations by a physician, laboratory tests, counseling, health education, and social service referral.

CHILD HEALTH SERVICES ASSISTANCE

Child health services include physical examination and childhood immunization for infants, preschool children, and school-age children of income eligible households The immunizations include vaccines for diphtheria, whooping cough, tetanus, polio, rubella and measles.

DENTAL SERVICES ASSISTANCE

Dental treatment services provides for regular dental health care through contracted services. Elements may include cleaning, tooth extraction, filling of cavities, and replacement with artificial materials.

MEDICAL SUPPLIES ASSISTANCE

This service is designed to provide medical supplies such as low vision aids, eyeglasses, to eligible persons. The provision of pharmaceutical services include prescribed drugs, insulin, diabetic testing materials, devises such as hypodermic syringes and needles, certain over the counter drugs and protein replacements prescribed by a physician and provided by licensed pharmacies approved by the State Medicaid and other insurance programs.

MENTAL HEALTH TREATMENT SERVICES ASSISTANCE

EMERGENCY/SCREENING SERVICE ASSISTANCE

Emergency/Screening Service provides 24-hour service, 7 days a week, to people in personal crisis. Emergency/Screening offers immediate crisis intervention and service procurement to relieve client distress and maintain or recover his/her level of functioning. Emphasis is on stabilization, so that the client can actively participate in needs assessment and in service planning.

CASE MANAGEMENT

Case management includes the provision of services activities that ensure a unified, coordinated and integrated client service system. Activities include, but are not limited to, post-intake assessment, service planning, service linkage and ongoing monitoring and evaluation.

SUBSTANCE ABUSE TREATMENT SERVICES ASSISTANCE

Drug and Alcohol Abuse Screening and Assessment will include the administration of various tests / examinations, development of family history of drug/alcohol use, referrals to appropriate treatment, and/or educational services.

HOME CARE SERVICES ASSISTANCE

HOMEMAKER ASSISTANCE

Homemaker Assistance helps maintain normal family functioning in times of temporary stress precipitated by the absence or incapacity of the regular homemaker. Under this program, trained personnel go into homes as substitute homemakers (or housekeepers) and assume responsibility for routine household activities such as menu planning, budgeting, child care, general household management, shopping, and food preparation.

HOME DELIVERED MEALS (PASSPORT)

Home delivered meals will be provided to the elderly in their own homes.

PERSONAL CARE

Personal Care is a program designed to provide basic non-medical personal care in the home. The program consists of activities such as bathing, grooming, and assistance with dressing.

HOME HEALTH CARE

Coordinated Home Health Care provides basic health service to selected patients who can be cared for at home. The service consists of part-time nursing care under medical supervision and may include home health aide services and extension of certain basic hospital services such as occupational therapy, physical therapy, speech therapy, medical social service, or homemaker service.

EMERGENCY SHELTER

The provision of short-term shelter to homeless persons or persons requiring protection during times of personal emergency or crisis until they can find permanent housing for themselves.

FOOD SERVICES

GROUP DINING/NUTRITION SITES

The provision of meals at a central location to special target groups such as the elderly, homeless, and low-moderate populations.

HOUSING SERVICES ASSISTANCE

HOUSING LOCATION ASSISTANCE

Housing Location Assistance helps homeless individuals and families/low-moderate income individuals/families find and move into adequate housing to meet their temporary needs. This service is geared to the special needs of those who are not in a position to help themselves, The assistance may be in the form of organized information and referral transporting or directing clients to prospective housing, assisting clients in the selection of available housing, and helping clients in dealing with landlords, utility companies, and other related business concerns.

RENT AND MORTGAGE ASSISTANCE

Rent and mortgage assistance allows good quality rental housing to become available to eligible low-income families at a cost they can afford. Payments are made to owners of approved rental housing to supplement the partial rental payment of eligible tenants. The supplement covers the difference between the tenant's payment and the market rental.

HOUSING MAINTENANCE/REPAIR WORKSHOPS

This service provides for the performance of repair activities needed to maintain safety and efficiency of a household. Such activities include: replacing window panes; repair of electrical plugs and cords 'furniture repair; repair of stairs, fours, and walls; minor exterior repairs, painting, and pluming. This services also includes the installation activities needed to maintain safety and efficiency within the household and those special tasks needed for adaptation of home for the handicapped. Such activities include: installing screens, store windows, shades, curtain rods, handrails, and caulking.

TRANSPORTATION SERVICES

TRANSPORTATION ASSISTANCE

Transportation assistance will be arrangement of transportation for clients to meet their needs such as social service, recreation and medical. This service would include providing information to the client about services.

SOCIAL SERVICE TRANSPORTATION

This service provides transportation to clients to insure access to social services. This includes door-to-door and route services.

MEDICAL TRANSPORTATION

Medical transportation services provide transportation to insure access to medical care. This services includes door-to-door and route services and may also be available for emergency transportation.

BASIC LIFE SKILLS

LIFE SKILLS EDUCATION

Life skills education provides practical education, guidance, or training in the activities of daily living, Type of activities may include instruction in personal appearance dealing with closing and hygiene, learning to organize and dress for school or work-home management skills such as budgeting, money management, meal planning and nutrition, cooking, decorating, home maintenance; social and community mobility such as shopping; consumer rights, leisure activities; negotiating community supports, such as learning how to get to and from school; developing natural supports; and cultivating citizenship's, social interaction with peers, and life planning.

PARENT EDUCATION

GROUP PARENT DEVELOPMENT TRAINING

Group parent development training instructs parent or potential parents in a group setting on effective parenting skills for resolving or preventing parent/child conflicts in order to bring about a strengthening of parent/child relationships.

The focus of this service will address several of the following skill areas related to improving communication and relationships:

- listening and letting the child communicate feelings
- focusing on positive and using positive language styles/words to promote positive self-esteem
- helping children solve conflict problems by exploring alternatives/choices, rather than over-intervening
- knowing how to criticize misbehavior or acts instead of the child
- disciplining out of love, rather than frustration where the goal is to educate/teach rather than punish/hurt
- disciplining using methods of teaching "logical consequences" where the child learns to accept responsibility for his/her actions
- knowing how to set clear age-appropriate limits

A second component of parent development training will address basic parenting child care skills such as: proper food, clothing, shelter, medical care, safety, hygiene, emotional/social growth and development, intellectual growth, involvement with schools, parental supervision, emotional/social/physical development

LITERACY EDUCATION

This service provides either an individualized (tutorial) or group education approach to individuals who are unable to read or write to adequately perform daily Irving activities. In addition to the actual instruction, service activities include individualized testing to determine the most appropriate approach and materials to be utilized.

CONTINUING EDUCATION

Continuing education is designed to provide opportunities for ongoing educational experiences to those who wish to broaden, intensify, or "keep up" their knowledge of their fields, or to those whose advancement or continuation in a particular field requires continuing or additional education. Elements are made available to those who have met basic educational or training requirements or who have conditionally acceded to a particular position but whose continued competence or development is enhanced by continued education. Elements may involve both credit and noncredit, degree-related or non degree related courses, and may include such things as special workshops, seminars, and conferences, as well as the more typical classroom instruction.

COUNSELING SERVICES

ADJUSTMENT

Supportive counseling includes efforts to develop personal and social strengths which can help people cope more effectively with life situations and their stresses. Attempts are made to change attitudes, broaden perspectives of available alternatives, increase

MBIE- ASSISTED LIVING HOUSING
CONSTRUCTION
PROJECT BUDGET
PHASE ONE

ITEM	AMOUNT
LAND COST	
Land & Building Aquisiton	(534,270 in kind)
Survey &Soil Test	2,000
Infrastrature Cost	
Subtotal	2,000
HARD COST	
Site Clearance & Demolition	15,000
Landscaping	10,000
Water & Sewer Hoop-Ups	0
Off Street parking	0
Construction	769,392
Construction Trailer	800
Contingency	0
Subtotal	795,192
SOFT COST	
Architect/Engineer Fee	68,250
Construction Manager	0
Builder's Risk Insurance	0
Property Taxes During Const	0
Marketing	1,300
Impact Fees & Permits	300
Market Study	1,000
Accounting	2,500
Legal Fees	3,000
Predevelopment Grant 1& 2	-40,000
Subtotal	36,350
FINANCING COSTS	
Interest on Construction Loan	48,423
Lender Fees	0
Closing Costs	29,250
Subtotal	77,673
PROJECT COST	911,215
DEVELOPER'S FEE 7%	63,785
NUMBER OF UNITS	12
TOTAL PROJECT COST	975,000
Area of Buildings	13,000
Cost Per Square Foot	75

Owner Name: Mary McLeod-Bethune Interventnion Enrichment Center
Facility Name: SSG Roy Scouten USARC, The United States Army Reserve Center, 271 Hedges Street Mansfield, Ohio 44906

First Year

	Jan.	Feb.	March	April	May	June	July	August	Sept.	Oct.	Nov.	Dec.	TOTAL
No./Amts on Last Day of Month:													
1. Private Pay Residents													
2. # of SSI Residents													
3. # of OSS Residents	12	12	12	12	12	12	12	12	12	12	12	12	12
4. Resident Fee - Private pay													
5. Resident Fee - SSI ($553 each)	6636	6636	6636	6636	6636	6636	6636	6636	6636	6636	6636	6636	79632
6. Resident Medicaid ($1800 each)	21600	21600	21600	21600	21600	21600	21600	21600	21600	21600	21600	21600	259200
Anticipated Revenue													
7. Fees from Residents													
8. Endownment/Trust Funds													
9. Donation/Solicitations													
10. Income from Investments													
11. Other (Specify)													
12. TOTAL REVENUE	28236	28236	28236	28236	28236	28236	28236	28236	28236	28236	28236	28236	338832
Anticipated Expenses													
13. Food/Groceries	900	900	900	900	900	900	900	900	900	900	900	900	10800
14. Salaries or Wages	15161	15161	15161	15161	15161	15161	15161	15161	15161	15161	15161	15161	181932
15. Utilities(gas, electric, heating oil, water, sewage)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	22800
16. Maintenance and Repairs	500	500	500	500	500	500	500	500	500	500	500	500	6000
17. Rent/Mortgage Payment	5666	5666	5666	5666	5666	5666	5666	5666	5666	5666	5666	5666	67992
18. Taxes (exempt)													
19. Laundry and Linens	400	400	400	400	400	400	400	400	400	400	400	400	4800
20. Transportation	500	500	500	500	500	500	500	500	500	500	500	500	6000
21. Insurance Premiums (property, liability)	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	12000
22. Other (Office Expense)	200	200	200	200	200	200	200	200	200	200	200	200	2400
23. License Fees	150	150	150	150	150	150	150	150	150	150	150	150	1800
24. TOTAL EXPENSES	26377	26377	26377	26377	26377	26377	26377	26377	26377	26377	26377	26377	316524
25. Net Income (loss) Total Rev. Minus Total Exp (Line 12 minus Line 24)	1859	1859	1859	1859	1859	1859	1859	1859	1859	1859	1859	1859	22308