
FINAL

**ENVIRONMENTAL ASSESSMENT
FOR BRAC 2005
CLOSURE, DISPOSAL, AND REUSE OF THE PFC JOE E. MANN
UNITED STATES ARMY RESERVE CENTER (WA032)
SPOKANE, WASHINGTON**



**Prepared for:
U.S. Army Reserve 88th Regional Support Command**

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February 2014

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FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT FOR
BRAC 2005
CLOSURE, DISPOSAL, AND REUSE OF THE
PFC JOE E. MANN
UNITED STATES ARMY RESERVE CENTER
SPOKANE, WASHINGTON

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission recommended that the Department of Defense close the PFC Joe E. Mann United States Army Reserve Center (Mann USARC or the property) in Spokane, Washington and relocate units to a new consolidated Armed Forces Reserve Center with an Organizational Maintenance Shop on Fairchild Air Force Base. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

Pursuant to the Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. § 4321 et seq.) and Environmental Analysis of Army Actions (32 CFR Part 651), the United States (U.S.) Army Corps of Engineers, Mobile District has prepared an Environmental Assessment (EA) for the U.S. Army Reserve (USAR), 88th Regional Support Command (RSC) that analyzes the potential environmental and socioeconomic effects associated with the closure, disposal, and reuse of the Mann USARC. The EA is incorporated by reference in this Finding of No Significant Impact (FNSI).

PROPOSED ACTION

The proposed action is the closure and disposal of the Mann USARC. Redevelopment and reuse of the surplus property made available by the closure of the Mann USARC would occur as a secondary action resulting from disposal.

Under BRAC law, the Army was required to close the Mann USARC no later than September 15, 2011. The Mann USARC was closed, and the Army will dispose of the USARC property in as-is condition, meaning the property would be transferred in its current condition, with all faults, and no warranties. 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.

ALTERNATIVES CONSIDERED

Alternative 1 – No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Mann USARC at levels the same as 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, the No Action Alternative allows comparison of impacts between the prior mission, the current caretaker status, and the reuse alternatives. Therefore, the No Action Alternative is evaluated in the EA.

Alternative 2 – Caretaker Status Alternative

The Army secured the Mann USARC after the military mission ended to ensure public safety and the security of remaining government property. From the time of operational closure until conveyance of the property, the Army's policy is to provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the Mann USARC is not transferred, the Army will reduce maintenance levels to the minimum level for surplus government property as specified in 41 CFR §§ 102-75.945 and 102-75.965, and Army Regulation 420-1 (Army Facilities Management).

Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

For Alternative 3, the property would be transferred in as-is condition with approximately 7 acres being used for a community facility. Section 17C.122.070 of the Spokane Municipal Code allows government, public services, social services, and education services in the C-2 zoning district. Potential community facility reuses could include, but are not limited to, public services, centers for vocational training, community education, or local community outreach. Under this reuse alternative the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-out as Commercial

For Alternative 4, the Army would transfer the property via a sale to private parties. The property would be transferred in as-is condition with approximately 7 acres being used for commercial activities. Section 17C.122.070 of the Spokane Municipal Code describes the commercial uses allowed in the C-2 zoning district. Potential commercial reuses could include, but are not limited to, financial, retail, personal services, hotels, restaurants, wineries and microbreweries, entertainment, museum, and cultural, professional and medical offices, motor vehicle sales, rental, repair, or washing, gasoline sales, automotive parts and tires, self-storage or warehouse. Under this reuse alternative, the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-out as Limited Industrial/Manufacturing

For Alternative 5, the property would be transferred via sale to private parties. The property would be transferred in as-is condition with approximately 7 acres being used for limited industrial/manufacturing use. Under Section 17C.122.070 of the Spokane Municipal Code limited industrial uses are allowed in this zoning district if on-site activities are entirely conducted within a building. Heavy industrial uses are not allowed. Under this reuse alternative, the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

FACTORS CONSIDERED IN DETERMINING THAT NO ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED

As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of each of the implementation alternatives and the No Action Alternative have been considered. The EA examined potential effects of Alternative 1 (No Action), Alternative 2 (Caretaker Status), Alternative 3 (Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use), Alternative 4 (Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial), and Alternative 5 (Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing) on 12 resource categories. This analysis included a detailed analysis of seven resource categories: aesthetics and visual resources, air quality, land use (current and future development in the region of influence, installation land, and surrounding land), hazardous and toxic substances (asbestos-containing material (ACM), lead, and lead-based paint (LBP)), noise, socioeconomics (economic development, environmental justice, housing, protection of children, and public services), and transportation (roadways and traffic and public transportation).

The former indoor firing range on the property was cleaned, and clearance sampling was conducted in 2001. All wipe sample results indicated that residual lead levels in the range were below the clearance level of 200 micrograms per square foot ($\mu\text{g}/\text{sf}$). As documented in the EA, any remaining ACM, LBP, and lead dust due to firing range activities would not present a threat to human health or the environment because the next owner of the property (the Grantee) would covenant and agree to undertake any abatement or remediation due to ACM, LBP, or lead dust that may be required under applicable laws and regulations at no cost to the Army. In addition, the Grantee's use would be in compliance with all applicable laws and regulations relating to asbestos, LBP, and lead dust.

PUBLIC COMMENT

Comments on the EA and FNSI were accepted during a 30-day public review period that began on February 6, 2014 and ended on March 8, 2014 in accordance with requirements specified in 32 CFR Part 651. The 30-day public view period was initiated by placing a Notice of Availability of the Final EA and Draft Finding of No Significant Impact in *The Spokesman-Review* and the *Pacific Northwest Inlander* on February 6, 2014. The Final EA and Draft FNSI were available at the Spokane Public Library (4005 North Cook Street, Spokane, Washington 99207), the North Spokane Public Library (44 East Hawthorne Road, Spokane, Washington 99218), and the Army's BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

During the 30-day public review period, the 88th RSC received no comments.

CONCLUSION

Based on the analysis in the EA, the 88th RSC determined that implementation of any of the Proposed Action alternatives would have no significant direct, indirect, or cumulative impacts on the natural or human environment. Because no significant environmental impacts will result from implementation of the Proposed Action alternatives, issuance of a FNSI is warranted, and preparation of an Environmental Impact Statement is not required.

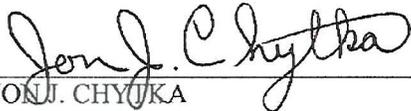


Date 21 MAR 2014

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Director, Public Works
88th Regional Support Command

ENVIRONMENTAL ASSESSMENT
FOR BRAC 2005
CLOSURE, DISPOSAL, AND REUSE OF THE
PFC JOE E. MANN
UNITED STATES ARMY RESERVE CENTER
SPOKANE, WASHINGTON

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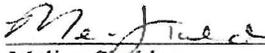
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Date 13 Jan 2014

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EXECUTIVE SUMMARY

ES 1 Introduction

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the PFC Joe E. Mann United States Army Reserve Center (Mann USARC or the USARC property) in Spokane, Washington and relocation of its units to a new consolidated Armed Forces Reserve Center (AFRC) with an Organizational Maintenance Shop on Fairchild Air Force Base. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

This Environmental Assessment (EA) analyzes the environmental impacts of the proposed closure, disposal, and reuse of the Mann USARC. 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 and socioeconomic consequences of the Proposed Action and alternatives.

This EA addresses the potential environmental, cultural, and socioeconomic effects of the Mann USARC closure, disposal, and reuse. The Department of the Air Force, Fairchild Air Force Base prepared separate NEPA documentation for construction and operation of the new AFRC (USAF 2007).

ES 2 Proposed Action

The proposed action is the disposal of surplus property made available by the realignment of the Mann USARC. Redevelopment and reuse of the surplus Mann USARC property would occur as a secondary action under disposal.

Under BRAC law, the Army was required to close the Mann USARC not later than September 15, 2011. The Mann USARC was closed and the Army will dispose of the property in as-is condition, meaning the property would be transferred in its current condition, with all faults, and no warranties. 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.

ES 3 Alternatives Considered

ES 3.1 Alternative 1 - No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Mann USARC at the same levels as 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, the 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 Mann USARC after the military mission ended in an effort to ensure public safety and the security of remaining government property. From the time of operational closure until conveyance of the property, the Army's policy is to provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the Mann USARC is not transferred, the Army will reduce maintenance levels to the minimum level for surplus government property as specified in 41 CFR §§ 102-75.945 and 102-75.965, and Army Regulation 420-1 (Army Facilities Management).

ES 3.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

For Alternative 3, the property would be transferred in as-is condition with approximately 7 acres being used for a community facility. Section 17C.122.070 of the Spokane Municipal Code allows government, public services, social services, and education services in C-2 zoning district. Potential community facility reuses could include, but are not limited to, public services, centers for vocational training, community education, or local community outreach. Under this reuse alternative, the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

ES 3.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC– For Full Build-Out as Commercial

For Alternative 4, the Army would transfer the property via a sale to private parties. The property would be transferred in as-is condition with approximately 7 acres being used for commercial use. Section 17C.122.070 of the Spokane Municipal Code describes the commercial uses allowed in the C-2 zoning district. Potential commercial reuses could include, but are not limited to, financial, retail, personal services, hotels, restaurants, wineries and microbreweries, entertainment, museum, and cultural, professional and medical offices, motor vehicle sales, rental, repair, or washing, gasoline sales, automotive parts and tires, self-storage or warehouse. Under this reuse alternative, the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

ES 3.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

For Alternative 5, the property would be transferred via sale to private parties. The property would be transferred in as-is condition with approximately 7 acres being used for limited industrial/manufacturing use. Under Section 17C.122.070 of the Spokane Municipal Code limited industrial uses are allowed in this zoning district if on-site activities are conducted entirely within a building. Heavy industrial uses are not allowed. Under this reuse alternative, the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

ES 4 Environmental Consequences

Table ES-1 lists each of the environmental resource categories and subcategories and it documents which resources are present and the potential environmental consequences. The

ranges of intensity of potential impacts discussed in this EA and listed in Table ES-1 are characterized as follows:

- No Impact - a resource is not present;
- No Impact - a resource is present, but is not affected;
- Negligible - the impact is not measurable at the lowest level of detection;
- Minor - the impact is slight, but detectable;
- Moderate - the impact is readily apparent and appreciable; and
- Significant - the impact is over a limit that would trigger requirements for mitigation or the preparation of an Environmental Impact Statement, as discussed at 40 CFR § 1508.27. These limits are established for each resource category.

Table ES-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
AESTHETICS AND VISUAL RESOURCES Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.1	Present; no impacts Present; not significant, moderate impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
AIR QUALITY Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.2	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, moderate impacts Present; not significant, minor impacts
BIOLOGICAL RESOURCES		
Critical Habitat	4.1.1	Not present; no impacts
Threatened and Endangered Species (State and Federal)	4.1.1	Not present; no impacts
Vegetation	4.1.3	Present; not significant, negligible/minor impacts
Wildlife	4.1.3	Present; not significant, negligible/minor impacts
Wilderness Areas and Wildlife Refuges	4.1.1	Not present; no impacts
CULTURAL RESOURCES		
Archaeological Resources	4.1.1	Not present; no impacts
Historic Buildings	4.1.1	Not present; no impacts
Historic Properties of Religious or Cultural Significance to Native Americans and Tribes	4.1.1	Not present; no impacts
GEOLOGY AND SOIL	4.1.3	Present; not significant, negligible/minor impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
HAZARDOUS AND TOXIC SUBSTANCES		
Asbestos-Containing Material Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.3	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Lead Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.3	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Lead-Based Paint Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.3	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Munitions and Explosives of Concern	4.1.1	Not present; no impacts
Past Uses and Operations	4.1.2	Present; no impacts
Polychlorinated Biphenyls	4.1.2	Present; no impacts
Radioactive Materials	4.1.1	Not present; no impacts
Radon	4.1.2	Present; no impacts
Storage, Use, Release of Chemicals/Hazardous Substances	4.1.3	Present; not significant, negligible/minor impacts
Underground Storage Tank/Aboveground Storage Tank	4.1.2	Present; no impacts
Waste Disposal Sites	4.1.2	Present; no impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
LAND USE		
Current and Future Development in the Region of Influence Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.4	Present; no impacts Present; not significant, moderate impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Installation Land/Airspace Use Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.4	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
National and State Parks	4.1.1	Not present; no impacts
Prime and Unique Farmland	4.1.1	Not present; no impacts
Surrounding Land Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.4	Present; no impacts Present; not significant, moderate impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
NOISE Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.5	Present; no impacts Present; not significant, negligible impacts Present; not significant, negligible to minor impacts Present; not significant, negligible to minor impacts Present; not significant, negligible to minor impacts
SOCIOECONOMICS		
Demographics	4.1.2	Present; no impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Economic Development Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; not significant, minor to moderate impacts Present; not significant, negligible/minor impacts Present; not significant, moderate impacts Present; not significant, minor impacts
Environmental Justice Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, minor impacts
Housing Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; no impacts Present; no impacts Present; no impacts Present; no impacts
Protection of Children Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; not significant, moderate impacts Present; no impacts Present; no impacts Present; no impacts
Public Services Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible impacts Present; not significant, negligible impacts Present; not significant, negligible impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
TRANSPORTATION		
Roadways and Traffic Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts
Public Transportation Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts
UTILITIES		
Communications	4.1.2	Present; no impacts
Energy Sources (Electrical, Gas, etc)	4.1.2	Present; no impacts
Potable Water Supply	4.1.2	Present; no impacts
Solid Waste	4.1.2	Present; no impacts
Wastewater/Storm Water System	4.1.2	Present; no impacts
WATER RESOURCES		
Floodplains/Coastal Barriers and Zones	4.1.1	Not present; no impacts
Hydrology/Groundwater	4.1.2	Present; no impacts
National Wild and Scenic Rivers	4.1.1	Not present; no impacts
Surface Water (Streams, Ponds, etc.)	4.1.1	Not present; no impacts
Wetlands	4.1.1	Not present; no impacts

ES 5 CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the Council on Environmental Quality regulations implementing NEPA (40 CFR Part 1500), and Environmental Analysis of Army Actions (32 CFR Part 651). 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.

The EA performed an analysis of 12 resource categories including a detailed analysis of seven resource categories: aesthetics and visual resources, air quality, hazardous and toxic substances

(asbestos-containing material, lead, and lead-based paint), land use (current and future development in the region of influence, installation land, and surrounding land), noise, socioeconomics (economic development, environmental justice, housing, protection of children, and public services), and transportation (roadways and traffic and public transportation). The analyses in the EA concluded there would be no significant adverse or significant beneficial environmental impacts resulting from any of the Proposed Action alternatives. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted, and preparation of an Environmental Impact Statement (EIS) is not required.

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SECTION 1.0 INTRODUCTION

This Environmental Assessment (EA) analyzes the potential environmental impacts of the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann United States Army Reserve Center (USARC) (WA032). The facility is located at 4415 North Market Street, Spokane, Spokane County, Washington (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. The purpose of the EA is to inform decision makers and the public of the likely environmental and socioeconomic 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 Commission (BRAC Commission) recommended closure of the Mann USARC (Figure 1-2) and realignment of essential missions to other installations. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations. Consequently, the purpose and need for the proposed action are the closure, disposal, and reuse of the Mann USARC.

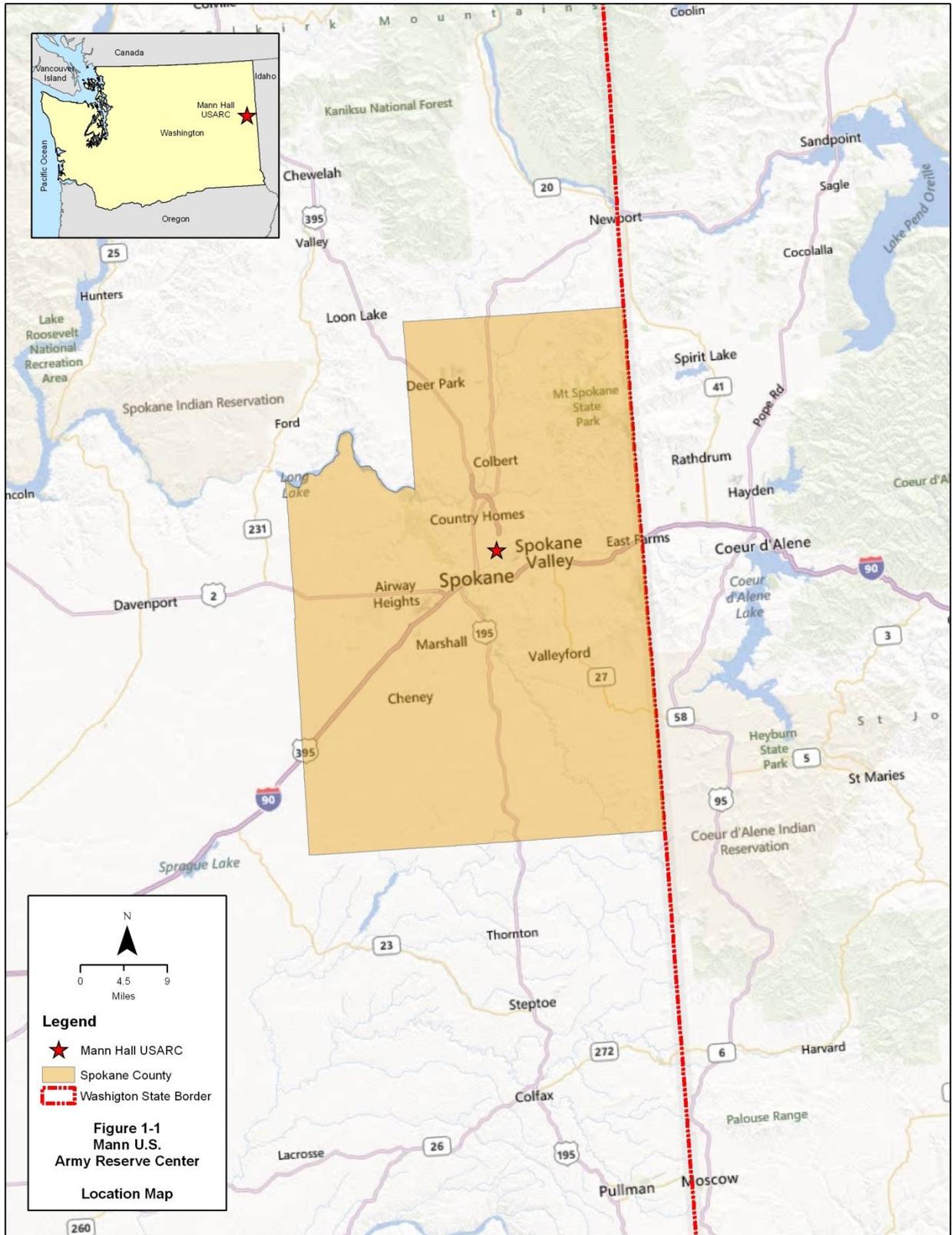
1.2 Public Involvement

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 relevant United States (U.S.), state, and tribal entities including the U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), U.S. Department of the Interior, Washington State Department of Ecology, Washington State Historic Preservation Office (WA SHPO), federally recognized Native American tribes, and others as appropriate.

If the Army determines that a Finding of No Significant Impact (FNSI) is appropriate, the 30-day public review period begins by publishing a Notice of Availability of the final EA and a draft FNSI in a local newspaper, The Spokesman-Review, and a regional newspaper, the Pacific Northwest Inlander. The EA and draft FNSI will be made available during the public review period at the Spokane Public Library (4005 North Cook Street, Spokane, Washington 99207), the North Spokane Public Library (44 East Hawthorne Road, Spokane, Washington 99218), 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 88th Regional Support Command (RSC), Meline Skeldon, 130 1/2 228th Street SW, Bothell, Washington 98021 or meline.e.skeldon2.ctr@mail.mil. If the Army determines that the disposal action will have a significant impact that cannot be mitigated, the Army will publish a Notice of Intent to prepare an Environmental Impact Statement (EIS) in the Federal Register.

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 impacts are found to be not significant, the Army will sign the FNSI and can proceed with the proposed disposal action. If potential impacts are found to be significant, the Army can decide to (1) proceed with the proposed action after committing in the Final FNSI to mitigation reducing the anticipated impact to a less than significant impact, or (2) publish a Notice of Intent to prepare an EIS in the Federal Register.





SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION

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

Under BRAC law, the Army was required to close the Mann USARC not later than September 15, 2011. The Mann USARC was closed and the Army will dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the U.S. Department of Defense (DoD) 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 Mann Hall Army Reserve Center, Area Maintenance Support Shop #80 and Walker Army Reserve Center in Spokane, WA, and relocate units to a new consolidated Armed Forces Reserve Center and Organizational Maintenance Shop on Fairchild Air Force Base. The new AFRC shall have the capability to accommodate units from the following Washington ARNG facilities: Washington ARNG Armory and Organizational Maintenance Shop, Geiger Field, WA, if the state decides to relocate those units.”

The former occupants of the Mann USARC, 981st Medical Detachment, 396th Medical Detachment, 22nd Legal Defense Organization Trial Defense Services, 643rd (Training), and AMSA #80, have relocated to the new Armed Forces Reserve Center (AFRC) on Fairchild Air Force Base. The Department of the Air Force, Fairchild Air Force Base prepared the NEPA documentation for construction and operation of the new AFRC (USAF 2007).

2.2 Local Redevelopment Authority's Reuse Plan

On September 1, 2006, the U.S. Office of Economic Adjustment officially recognized the City of Spokane as the Local Redevelopment Authority (LRA) for the purpose of formulating a recommendation for the reuse of the Mann USARC. On September 19, 2006, the DoD published recognition of the LRA in the Federal Register. In accordance with 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 (NOIs) from state and local governments, representatives of the homeless, and other interested parties. The LRA published a request for NOIs in the Spokesman-Review on October 18, 2006. A public workshop was held on January 10, 2007 and was attended by 95 individuals. Subsequent to this meeting, a press release seeking NOI proposals was issued on January 11, 2007. A networking workshop for prospective proponents was held on February 15, 2007 (City of Spokane 2008).

The LRA received NOIs from the organizations and individuals listed. Ten responses were made, representing eight project proposals.

- Northwest Laborers-Employers Training Trust
- Museum Consortium
- City of Spokane Municipal Court Probation Services Department

-
- Steve Larson
 - Community Colleges of Spokane
 - AscendA, Inc.
 - Spokane Public Schools
 - Michael Meagher
 - Greater Hillyard Business Association
 - Hillyard Town Square

As part of the screening process, the LRA held a question and answer session with the NOI submitters to request additional information and determine if their proposal included a homeless benefit. Based on each proposal's perceived value and viability, the LRA reduced the list of proposals to the following: Community Colleges of Spokane; the Spokane Public School District; and the Greater Hillyard Business Association/Hillyard Community (later known as the Consortium Proposal) (City of Spokane 2008). After further consideration, the LRA recommended the Spokane Public School District (District 81) reuse the property.

The LRA submitted the Redevelopment Plan for the Mann USARC on May 8, 2008 to the DoD, Office of Economic Adjustment, and HUD. HUD approved the LRA's redevelopment plan on October 7, 2009. The U.S. Department of Education approved the Application for Public Benefit Allowance of Acquisition of Surplus Federal Real Property for Education Purposes submitted by the Spokane School District.

Subsequent to the approval of the School District proposal and the approval by the Department of Education, the Mann USARC was vandalized, resulting in between \$800,000 and \$1.2 Million in damage to the buildings. Consequently, the School District withdrew its proposal on February 13, 2013 because it would be cost-prohibitive to remodel the property for its reuse.

For this reason, the City of Spokane formed a new LRA to attempt to find a new reuse for the property and revise the redevelopment plan. In order to expedite the process, the City Council acted as the new LRA. According to Linda R. Charest from HUD, the completed HUD homeless assistance use screening process carried over from the first initiative in 2008 and did not need to be repeated (City of Spokane 2008).

The Spokane City Council held a community meeting on April 4, 2013 to discuss the future vision of the Mann USARC. Subsequent to the meeting, the Spokane City Council determined, and the U.S. Army concurs, that a residential or recreational development was not affordable or desirable for the property. Options that were both viable and attractive to the public included a police substation, community center, or job training facility. Other options discussed by the Spokane City Council included transferring the land to the Spokane Tribe of Indians or developing the property for commercial/light industrial uses.

On May 13, 2013, the LRA announced that it would accept NOIs between May 13 and July 15, 2013 for reuse of the Mann USARC. From this NOI solicitation, the Spokane City Council selected the Bureau of Indian Affairs (BIA) proposal to be incorporated in the new redevelopment plan for the Mann USARC. The BIA's proposal called for transfer of the property to the Spokane Tribe of Indians, which would refurbish the existing Mann USARC buildings, with the property to provide a location for manufacturing, business incubation, workforce development, and office space for nonprofit organizations and tribal and community

resources. On July 29, 2013 the Spokane City Council submitted the new redevelopment plan to the Army.

However, as part of the BRAC process, the Army was required by law (Pub. L. No. 103-160. §2904 (1993)) to identify other DoD and federal agency property needs no later than 6 months after the date of approval of closure and realignment of the Mann USARC. Because the BIA is a federal agency and did not express an interest in reusing the property within the prescribed time, the Army cannot transfer the property to the BIA using this method. For this reason, the Army will be disposing of the property using a different conveyance method.

2.3 Description of the Mann USARC

The property is located at 4415 North Market Street, Spokane, Washington (Section 3, Township 25 North, Range 43 East). In 1947, the U.S. Government purchased the 7-acre property and constructed the main administrative building and the area maintenance and support activity (AMSA) shop in 1953 (USACE 2007).

Figure 1-2 shows the Mann USARC site layout. The USARC contains two permanent structures and two parking lots, including a military equipment parking (MEP) area and privately owned vehicle (POV) parking. A chain-link security fence topped with barbed wire encloses the MEP area and the AMSA building. Both the 27,237 square-foot main building and the 10,289 square-foot AMSA building were constructed on concrete foundations with concrete block walls covered with a brick veneer.

The main building is an irregular-shaped structure with one- and two-story administrative sections, and a 1 1/2-story drill hall. The building's interior consists of office space, classrooms, a kitchen area, storage areas, a drill hall, and a mechanical room.

The AMSA shop is a five-bay, one-story irregularly shaped structure with a second level mezzanine balcony. The AMSA shop was primarily used for vehicle maintenance. A vehicle wash area consisting of a concrete pad was located southeast of the AMSA shop (USACE 2007).

The Mann USARC was most recently occupied by the 981st Medical Detachment, 396th Medical Detachment, 22nd Legal Defense Organization Trial Defense Services, 643rd (Training), and AMSA #80. The Mann USARC previously consisted of 10 full time staff and approximately 90 reservists that trained at the Mann USARC one weekend per month.



Photograph 1. Mann USARC main administration building, front entrance.



Photograph 2. Mann USARC main administration building, side entrance



Photograph 3. Mann USARC, AMSA.



Photograph 4. Mann USARC, main building, AMSA, POV and MEP parking.



Photograph 5. Mann USARC, example of vandalism that occurred to the buildings in the fall of 2012, resulting in extensive damage.

SECTION 3.0 ALTERNATIVES

A key principle of NEPA is that agencies are to give full consideration to a range of reasonable alternatives to a proposed action. Considering alternatives helps to avoid unnecessary impacts and allows analysis of reasonable ways to achieve the stated purpose. To be considered reasonable, an alternative must be affordable, capable of implementation, and satisfactory with respect to meeting the purpose of and need for the action. The following discussion identifies alternatives considered by the Army and identifies whether they are feasible and, hence, subject to detailed evaluation in this EA.

3.1 Alternative 1 – No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Mann USARC at the same levels as 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, the 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 Mann USARC after the military mission ended in an effort to ensure public safety and the security of remaining government property. From the time of operational closure until conveyance of the property, the Army's policy is to provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the Mann USARC is not transferred, the Army will reduce maintenance levels to the minimum level for surplus government property as specified in 41 CFR §§ 102-75.945 and 102-75.965, and Army Regulation 420-1 (Army Facilities Management).

3.3 Disposal and Reuse Alternatives

The primary action evaluated is disposal of the excess property made available by the Congressionally mandated closure. This is an action for which the Army has responsibility, and both the authority and ability to control. The secondary action is reuse development of the property after ownership is transferred, an action taken by others as a result of the Army's decision to dispose of the property. Because reuse is a "secondary action" to the Army's "primary action" of disposal and involves decisions ultimately made by others, the Army does not identify a preferred reuse alternative.

Methods available to the Army for property disposal include public benefit conveyances (PBCs), which are authorized by federal statute and are transfers of surplus federal government property to State and local governments and certain non-profit organizations for specific public purposes. PBCs can take place for less than fair market value. For a PBC, there is a sponsoring federal agency with regulations that set forth the criteria it uses for determining whether an applicant is eligible for a PBC and whether the applicant has a need for the property.

Other methods available to the Army include negotiated sale (where the Army would negotiate the sale of the property to state or local governments or private parties at fair market value) and competitive sale (where sale to the public would occur through either an invitation for bids or an auction). The reuse planning process is dynamic and often dependent on market, economic, and other conditions beyond the control of the reuse planning authority.

Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Mann USARC property is in an area that the City of Spokane has zoned as CC2-DC, Type 2 Center and Corridor – District Center, a district that allows for residential, office, retail, and light industrial uses. Maximum height for buildings is 55 feet and the maximum floor area ratio (FAR) is 2.3. There is no set distance for setback from streets (Pelton, Personal Communication 2013).

Because the LRA's Redevelopment Plan has changed, the Army is examining other conveyance methods to dispose of the property in an expedient manner. The following alternatives evaluate a reasonable and likely range of reuse and disposal possibilities for the Mann USARC property. Although these reuse alternatives are hypothetical, they have been established to encompass possible reuses of the property.

3.3.1 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

For Alternative 3, the property would be transferred in as-is condition with approximately 7 acres being used for a community facility. Section 17C.122.070 of the Spokane Municipal Code allows government, public services, social services, and education services in C-2 zoning district. Potential community facility reuses could include, but are not limited to, public services, centers for vocational training, community education, or local community outreach. Under this reuse alternative the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

3.3.2 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

For Alternative 4, the Army would transfer the property via a sale to private parties. The property would be transferred in as-is condition with approximately 7 acres being used for commercial use. Section 17C.122.070 of the Spokane Municipal Code describes the commercial uses allowed in the C-2 zoning district. Potential commercial reuses could include, but are not limited to, commercial, financial, retail, personal services, hotels, restaurants, wineries and microbreweries, entertainment, museum, and cultural, professional and medical offices, motor vehicle sales, rental, repair, or washing, gasoline sales, automotive parts and tires, self-storage or warehouse. Under this reuse alternative, the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

3.3.3 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

For Alternative 5, the property would be transferred via sale to private parties. The property would be transferred in as-is condition with approximately 7 acres being used for limited industrial/manufacturing use. Under Section 17C.122.070 of the Spokane Municipal Code limited industrial uses are allowed in this zoning district if on-site activities are entirely conducted within a building. Heavy industrial uses are not allowed. Under this reuse alternative, the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

3.4 Alternatives Considered and Eliminated From Further Analysis

3.4.1 Early Transfer and Reuse

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 (ECP) Report classifies the property as Type 2, one of seven DoD Environmental ECP categories (USACE 2007; U.S. Army 2010; 88th RSC 2011). A Type 2 classification is defined as an area where only the release or disposal of petroleum products or their derivatives has occurred. Because all necessary remediation is complete and no remedial action is required, the Mann USARC does not meet the criteria for the early transfer alternative.

3.4.2 Other Reuse Options

The LRA screened this federal government surplus property by soliciting NOIs 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. As noted above, ten organizations responded to the request. The LRA initially selected the Spokane Public School District NOI because the other proposals did not meet the practical needs of acquisition, development, and sustainability, within the guidelines of the BRAC process. The other organizations did not demonstrate the capacity and resources to create viable long-term use of the property (City of Spokane 2008). However, as discussed above, the Spokane Public School District is no longer interested in obtaining the USARC because the buildings were vandalized and it would be cost-prohibitive to remodel the buildings for school district reuse.

The LRA reopened the NOI process to find a new reuse for the property. A NOI was received from the BIA, but the Army deemed transfer to the BIA using this method was not a viable option as they are a federal agency that did not identify a property need within the 6-month period after the date of approval of closure and realignment of the Mann USARC.

Other possible reuse options considered were school use, park and recreational use, or residential development. However, the City of Spokane does not consider park, recreational, and residential uses to be desired uses for the property because none of the original proposals focused primarily on these reuses. In addition, the site is located between two heavily traveled one-way arterials that carry substantial truck traffic, making residential use unsuitable (Stuckart, Personal Communication 2013).

SECTION 4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

The affected environment is a description of the existing environment potentially affected by the proposed action (40 CFR §1502.15). This section analyzes the significance of direct, indirect, and cumulative impacts of the proposed action and alternatives on the affected environment. An impact is defined as a consequence from modification to the affected environment due to a proposed action or alternative.

Impact

An environmental consequence or impact (referred to in this document as an impact) is defined as a noticeable change in a resource from the existing environmental baseline conditions caused by or resulting from the proposed action. As noted in Section 3, the baseline is the operations level at the Mann USARC and existing environment present immediately prior to the BRAC Commission's recommendations for closure becoming final. The terms "impact" and "effect" are synonymous as used in this EA. Impacts may be determined to be beneficial or adverse and may apply to the full range of natural, aesthetic, cultural, and economic resources of the installation and its surrounding environment.

Direct Versus Indirect Impacts

Where applicable, analysis of impacts associated with each course of action has been further divided into direct and indirect impacts. Definitions and examples of direct and indirect impacts as used in this document are as follows:

- **Direct Impacts.** Direct impacts are caused by the action and occur at the same time and place. Both short- and long-term direct impacts can be applicable.
- **Indirect Impacts.** Indirect impacts are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.
- **Application of Direct Versus Indirect Impacts.** For direct impacts to occur, a resource must be present in a particular area. For example, if highly erodible soil were disturbed due to construction, there would be a direct impact to soil from erosion at the development site. Sediment-laden runoff might indirectly affect surface water quality in adjacent areas downstream from the development site.

Indirect impacts are described for the resource category in which indirect impacts are anticipated to occur. For those resource categories with no anticipated indirect impacts, no further discussion on indirect impacts will be included in the Consequences sections.

Long-Term versus Short-Term Impacts

Impacts to resources may occur in a relatively short period of time or may be permanent. In this EA, the estimated time durations during which impacts may be perceived or measured are described as short- or long-term.

Short-term impacts are generally realized just after or as a result of implementation of the alternative. Short-term impacts may result from preparation of the site for construction, actual

construction, and renovation of existing facilities. Some resources may exhibit short-term impacts as they recover from any disturbances.

Long-term impacts are realized later in time after implementation of the alternative. The longer duration may be resource specific (e.g., soil impacts from increased impervious surfaces) or may be a result of the persistence of the cause of the impact (e.g., increased traffic during weekdays without traffic calming measures).

Significance

The term “significant,” as defined in the CEQ Regulations for Implementing NEPA, 40 CFR 1500, requires consideration of both the context and intensity of the impact evaluated.

Context Significance can vary in relation to the context of the action. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend on the effects in the locale rather than in the world as a whole. Both short–and long–term effects may be relevant.

Intensity In accordance with the CEQ implementing regulations, impacts are also evaluated in terms of their intensity or severity. Factors contributing to the evaluation of the intensity of an impact are listed in the CEQ regulations, 40 CFR § 1508.27(b).

The ranges of intensity of potential impacts discussed in this EA are characterized as follows:

- No Impact - a resource is not present;
- No Impact - a resource is present, but is not affected;
- Negligible - the impact is not measurable at the lowest level of detection;
- Minor - the impact is slight, but detectable;
- Moderate - the impact is readily apparent and appreciable; and
- Significant - the impact is over a limit that would trigger requirements for mitigation or the preparation of an Environmental Impact Statement, as discussed at 40 CFR 1508.27. These limits are established for each resource category.

Resource Categories Analyzed

Twelve resource areas were considered for potential impacts resulting from the Proposed Action alternatives including aesthetics and visual resources, air quality, biological resources, cultural resources, geology and soils, hazardous and toxic substances, land use, noise, socioeconomics, transportation, utilities, and water resources. Some resources were eliminated from detailed analysis as described below. Table 4-1 lists each of the environmental resource categories and subcategories, documents which resources are present and the environmental consequences, and references the document section containing each discussion.

As noted in the following analysis, none of the potential impacts identified in this EA are significant.

Table 4-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
AESTHETICS AND VISUAL RESOURCES Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.1	Present; no impacts Present; not significant, moderate impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
AIR QUALITY Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.2	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, moderate impacts Present; not significant, minor impacts
BIOLOGICAL RESOURCES		
Critical Habitat	4.1.1	Not present; no impacts
Threatened and Endangered Species (State and Federal)	4.1.1	Not present; no impacts
Vegetation	4.1.3	Present; not significant, negligible/minor impacts
Wildlife	4.1.3	Present; not significant, negligible/minor impacts
Wilderness Areas and Wildlife Refuges	4.1.1	Not present; no impacts
CULTURAL RESOURCES		
Archaeological Resources	4.1.1	Not present; no impacts
Historic Buildings	4.1.1	Not present; no impacts
Historic Properties of Religious or Cultural Significance to Native Americans and Tribes	4.1.1	Not present; no impacts
GEOLOGY AND SOIL	4.1.3	Present; not significant, negligible/minor impacts
HAZARDOUS AND TOXIC SUBSTANCES		
Asbestos-Containing Material Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.3	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Lead Alternative 1 – No Action Alternative	4.2.3	Present; no impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing		Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Lead-Based Paint Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.3	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Munitions and Explosives of Concern	4.1.1	Not present; no impacts
Past Uses and Operations	4.1.2	Present; no impacts
Polychlorinated Biphenyls	4.1.2	Present; no impacts
Radioactive Materials	4.1.1	Not present; no impacts
Radon	4.1.2	Present; no impacts
Storage, Use, Release of Chemicals/Hazardous Substances	4.1.3	Present; not significant, negligible/minor impacts
Underground Storage Tank/Aboveground Storage Tank	4.1.2	Present; no impacts
Waste Disposal Sites	4.1.2	Present; no impacts
LAND USE		
Current and Future Development in the Region of Influence Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.4	Present; no impacts Present; not significant, moderate impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Installation Land/Airspace Use Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.4	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
National and State Parks	4.1.1	Not present; no impacts
Prime and Unique Farmland	4.1.1	Not present; no impacts
Surrounding Land Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.4	Present; no impacts Present; not significant, moderate impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
NOISE Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.5	Present; no impacts Present; not significant, negligible impacts Present; not significant, negligible to minor impacts Present; not significant, negligible to minor impacts Present; not significant, negligible to minor impacts
SOCIOECONOMICS		
Demographics	4.1.2	Present; no impacts
Economic Development Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; not significant, minor to moderate impacts Present; not significant, negligible/minor impacts Present; not significant, moderate impacts Present; not significant, minor impacts
Environmental Justice Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Alternative 4 – Traditional Disposal and Reuse as Commercial		Present; not significant, minor impacts
Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing		Present; not significant, minor impacts
Housing Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; no impacts Present; no impacts Present; no impacts Present; no impacts
Protection of Children Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; not significant, moderate impacts Present; no impacts Present; no impacts Present; no impacts
Public Services Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible impacts Present; not significant, negligible impacts Present; not significant, negligible impacts
TRANSPORTATION		
Roadways and Traffic Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility Alternative 4 – Traditional Disposal and Reuse as Commercial Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts
Public Transportation Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Disposal and Reuse as Community Facility	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor to moderate impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Mann USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Alternative 4 – Traditional Disposal and Reuse as Commercial		Present; not significant, minor to moderate impacts
Alternative 5 – Traditional Disposal and Reuse as Limited Industrial/Manufacturing		Present; not significant, minor to moderate impacts
UTILITIES		
Communications	4.1.2	Present; no impacts
Energy Sources (Electrical, Gas, etc)	4.1.2	Present; no impacts
Potable Water Supply	4.1.2	Present; no impacts
Solid Waste	4.1.2	Present; no impacts
Wastewater/Storm Water System	4.1.2	Present; no impacts
WATER RESOURCES		
Floodplains/Coastal Barriers and Zones	4.1.1	Not present; no impacts
Hydrology/Groundwater	4.1.2	Present; no impacts
National Wild and Scenic Rivers	4.1.1	Not present; no impacts
Surface Water (Streams, Ponds, etc.)	4.1.1	Not present; no impacts
Wetlands	4.1.1	Not present; no impacts

4.1 Environmental Resources Eliminated from Further Considerations

Army NEPA Regulations (32 CFR § 651.14) state 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)) emphasize 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 resource categories will, therefore, be discussed in multiple subsections throughout Section 4.

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 the resource categories, because these resources do not exist on or near the Property:

- **Critical Habitat** – The property is in an urban setting, is disturbed, and over 80 percent of the Property is covered by impervious features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass and therefore lacks natural habitat. The 88th RSC Memorandum for

Record dated January 14, 2010 documented that the USFWS has not designated critical habitat on or in the vicinity of the property (Appendix A).

- **Threatened and Endangered Species (State and Federal)** – No listed species are known to be present on the property, nor is there suitable habitat for any of the federally proposed or candidate species listed for Spokane County. Coordination was conducted with the USFWS (Appendix A). The USFWS agreed that a no effect determination is appropriate for this federal action, and the USFWS has no concerns for listed species.
- **Wilderness Areas and Wildlife Refuges** – The nearest national wilderness areas are Salmo-Priest Wilderness and Cabinet Mountains Wilderness, which are located approximately 109 and 146 miles from the property, respectively. The nearest national wildlife refuges (NWR) are Turnbull NWR and Little Pend Orielle NWR, which are located approximately 30 and 87 miles from the property, respectively. Because of their distance from the property, these resources would not be affected by the proposed action.
- **Archaeological Resources** – No archaeological sites are known to occur on the Mann USARC property. In a letter dated January 5, 2011, the WA SHPO concurred that the project activities would have no effect on cultural resources (Appendix A). However, as stated in the letter from the WA SHPO, should artifacts or archaeological features be encountered during construction activities, work shall cease and the WA SHPO and appropriate Tribes shall be consulted immediately.
- **Historic Buildings** – The Mann USARC was constructed in 1953 and contains two permanent structures: a main administration building and an AMSA building. The 88th RSC determined that the Mann USARC is not eligible for the National Register of Historic Places (NRHP) and that no historic properties would be affected by the proposed closure, disposal, and reuse of the property in a letter dated December 17, 2010 to the WA SHPO (Appendix A). The WA SHPO concurred with the determination in a letter dated January 5, 2011 (Appendix A).
- **Historic Properties of Religious or Cultural Significance to Native Americans and Tribes** – No properties of religious or cultural significance to the Coeur d' Alene Tribe, the Confederated Tribes of the Colville Reservation, the Kalispel Indian Community of Kalispel Reservation, or the Spokane Tribe have been identified through consultation. Native American coordination is presented in Appendix A.
- **Munitions and Explosives of Concern** – There was no evidence found during the ECP site reconnaissance or from USAR personnel interviews of the past presence of munitions and explosives of concern on the Mann USARC property (USACE 2007).
- **Radioactive Materials** – The Mann USARC's mission included medical activities that primarily included training and performance of medical exams and the use of x-ray rooms. Most of these rooms were converted into offices, but a dental x-ray room remains in the basement of the main building. Based on interviews with USAR personnel during the ECP site reconnaissance, the Mann USARC never had a Nuclear Regulatory permit and site personnel were unaware of any other radioactive materials or activities on the property (USACE 2007). The Mann USARC radiological clearance survey report was completed in August 2011 (U.S. Army 2011). The report provides an evaluation of radiological materials used and the summary of findings and results. The report concluded that no further action is required with respect to radiological devices or materials identified. The USARC buildings are suitable for unrestricted use.

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- **National and State Parks** – The property does not contain and is not near any national or state parks. The nearest national parks are the Lake Roosevelt National Recreation Area and the Lewis & Clark National Historic Trail, which are located approximately 67 and 98 miles from the property, respectively. The nearest state parks are the Riverside State Park and the Mount Spokane State Park, which are located approximately 12 and 22 miles from the property, respectively.
 - **Prime and Unique Farmland** – 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** – According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 53063C0555D, the property is not located within a 100-year or 500-year flood prone area. The property is also not in a coastal zone management area (USACE 2007).
 - **National Wild and Scenic Rivers** – Three designated Wild and Scenic Rivers are present in the state of Washington. The nearest Wild and Scenic Rivers are the Klickitat River and the Skagit River, which are approximately 215 and 225 miles from the property, respectively. Because of their distance from the property, these resources would not be affected by the proposed action.
 - **Surface Water (Streams, Ponds, etc.)** – The site reconnaissance revealed that no streams, ponds, or other surface water features are present on the property.
 - **Wetlands** – The site reconnaissance revealed that no wetlands are present on the USARC property. Wetland indicators including wetland vegetation, hydric soils, or wetland hydrology were not observed on the property.

4.1.2 Environmental Resources that are Present, but Not Impacted

None of the alternatives would have significant direct, indirect, or cumulative impacts on the following subcategories of the environmental categories, because proposed demolition or new construction activities would not alter or affect these resources:

- **Past Uses and Operations (Hazardous and Toxic Substances)** – The property is classified as an ECP category Type 2, an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred (USACE 2007; U.S. Army 2010, 88th RSC 2011). This classification is based on contaminated soils encountered during underground storage tank (UST) removal, a 250-gallon fuel spill, and a 10-gallon diesel fuel spill. Because no remedial action is required, past uses and operations on the property regarding hazardous and toxic substance would have no direct, indirect, or cumulative impacts on the implementation of the alternatives.

Historically, the property primarily functioned as an administrative, storage, maintenance, and medical training facility. The USARC was also used by reservists for drill activities on various weekends throughout the year. An indoor firing range formerly existed in the main building, but it was cleaned and clearance sampling was conducted in 2001 (IT Corporation 2001). The AMSA was used to perform routine vehicle maintenance including checking and changing fluids, replacement of brakes, and tune ups.

There are three oil-water separators (OWSs) present on the property that all drain to the sanitary sewer. One OWS is associated with the vehicle wash pad that is located adjacent to the AMSA shop. The two other OWSs are associated with the parking areas on the property and receive stormwater from drains within the POV parking area and MEP area. Historically, a grease rack was located in the AMSA shop, but has been removed (USACE 2007).

- **Polychlorinated Biphenyls** – There would be no direct, indirect, or cumulative impacts from the presence of polychlorinated biphenyls (PCBs) on the implementation of the alternatives because any suspected PCB-containing material would be managed by the next owner of the property (the Grantee) in accordance with applicable local, state, and federal regulations. Three pole-mounted transformers are located on the property. All transformers are operated and maintained by the Avista Utilities Company and had labels indicating that they do not contain PCBs (USACE 2007). PCBs may be contained in light ballasts in older type fluorescent light fixtures. At the time of the ECP site reconnaissance visit, the ballasts appeared to be in good condition and no leaking dielectric fluid was observed (USACE 2007). As such, they are in compliance with federal and state regulations and have not negatively affected environmental conditions on the property. If any ballasts that are not marked “No PCBs” are encountered and begin to leak or are removed from service, then they should be assumed to contain PCBs.
- **Radon** – There would be no direct, indirect, or cumulative impacts from the presence of radon on the implementation of the alternatives because radon levels found at the Mann USARC were below the USEPA accepted action level of 4.0 picocuries per liter (USACE 2007).
- **Underground Storage Tanks /Aboveground Storage Tanks** – There would be no direct, indirect, or cumulative impacts from the presence of USTs or aboveground storage tanks (ASTs) on the implementation of the alternatives because any USTs or ASTs would be managed by the Grantee in accordance with applicable local, state, and federal regulations. The property contains one 250-gallon, double-walled concrete used oil AST. The AST is located near the southwest corner of the AMSA shop. The tank itself shows staining, but no stains or evidence of spills or release on the ground was observed. Based on interviews with USAR personnel during the ECP site reconnaissance, one or more ASTs had been present in the past, but the exact location(s) was unknown (USACE 2007). No USTs are currently present on the property. Historically two heating oil USTs and one UST used for waste oil, antifreeze, solvents, and brake fluid were present on the property (USACE 2007). All three USTs have been removed from the property. One of the heating oil UST cavities exhibited contaminated soils, which were removed at the time of the tank removals, which placed it on the State Leaking Underground Storage Tank (LUST) list. The status of the site is listed as “reported cleaned up”, dated July 1992.
- **Waste Disposal Sites** – There would be no direct, indirect, or cumulative impacts from waste disposal sites at the Mann USARC on the implementation of the alternatives because waste disposal activities on the property were conducted in accordance with local, state, and federal regulations. In addition, the Grantee would properly dispose of waste generated from the reuse, including demolition and construction waste, in accordance with local, state, and federal regulations. The Mann USARC is a Resource

Conservation and Recovery Act (RCRA) conditionally exempt small quantity generator (CESQG). CESQGs are defined as facilities generating less than 100 kilograms (kg) of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Solid waste for the USARC is managed on-site in two metal dumpsters and emptied by Waste Management of Spokane weekly (USACE 2007). Non-hazardous waste management, such as waste oil, is managed by the Defense Logistics Agency Disposition Services (USACE 2007).

- **Demographics** – The alternatives would have no direct, indirect, or cumulative impacts on demographics because the proposed action would not alter the composition of the population in the region of influence (ROI).
- **Utilities** – The alternatives would have no direct, indirect, or cumulative impacts on utility services because the utilities available at the USARC have the capacity to provide service for any of the alternatives and any change in demand and usage would be non-significant.
- **Hydrology/Groundwater** - The alternatives would have no direct, indirect, or cumulative impacts on hydrology or groundwater because demolition or new construction associated with the proposed action would not affect surface hydrology or occur deep enough to affect groundwater.

4.1.3 Environmental Resources are Present, but Not Significant, Negligible/Minor Environmental Impacts

The resources discussed below are present at the Mann USARC and impacts may occur to these resources as a result of implementing the proposed action. Because these impacts would have little to no measureable environmental effect on the resource, the impacts will not be discussed in detail.

- **Vegetation** – The alternatives would have negligible direct, indirect, or cumulative impacts on the vegetation present at the Mann USARC because the USARC is developed and urbanized. Over 80 percent of the property is covered by impervious features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass.
- **Wildlife** – The alternatives would have minor direct, indirect, or cumulative impacts on wildlife present at the Mann USARC. Existing wildlife consists of a few species found in typical urban environments such as songbirds, small mammals, and invertebrates. Although demolition or new construction activities would temporarily displace any individuals utilizing the area for habitat, there would be minor environmental effects.
- **Storage, Use, Release of Chemicals/Hazardous Substances** – The property is classified as an ECP category Type 2, an area or parcel of real property where the release or disposal of only petroleum products or their derivatives has occurred. Because no remedial action is required, storage, use, or release of chemicals/hazardous substances on the property would have no direct, indirect, or cumulative impacts on the implementation of the alternatives.

In 1992, there was a 250-gallon release of unleaded fuel on the property due to a leak in a portable fuel tank (Roar Tech, Inc. 1992). The site of the release was an asphalt area in the southeast corner of the POV parking area, and the Washington Department of Ecology's report stated that the fuel had penetrated the asphalt to the soil below

(USACE 2007). Soil sampling and remediation activities were completed by Roar Tech, Inc. in July 1992. The results of the soil analysis showed soil excavation efforts had removed the majority of the lost fuel and met or exceeded the Model Toxics Control Act Cleanup Regulation Criteria (Roar Tech, Inc. 1992). A copy of the soil remediation report was sent to the Washington Department of Ecology.

In 2009, a 10-gallon diesel fuel release occurred on the property. A vehicle fuel tank was ruptured, and diesel fuel leaked from the rupture to the asphalt pavement beneath the vehicle and flowed towards a stormwater catch basin that runs to an onsite OWS. However, the fuel did not reach the level of the outlet invert in the catch basin, and was contained. A waste treatment and disposal company was contacted immediately, and the contractor removed the affected absorbent material and water/diesel mixture in the clean-up effort (U.S. Army 2010).

Chemicals formerly used and stored on the property were associated with vehicle and facility maintenance activities and janitorial services. Janitorial and building maintenance related chemicals were stored in a designated storage area within the janitorial closets in the main building. Vehicle maintenance and petroleum, oils, and lubricants (POL) were stored within designated POL areas in the AMSA shop, or in a hazmat shed. Any remaining small quantities of hazardous and toxic substances would be disposed of in accordance with federal, state, local, and DoD requirements. The reduction in the use of these hazardous and toxic substances would result in a negligible short-term beneficial impact.

- **Geology and Soil** – The alternatives would have minor direct, indirect, or cumulative impacts on the geology or soil at the Mann USARC because the soils present at the property have been compacted and disturbed from previous typical development and urban activities. Demolition or new construction activities may involve excavation, grading, and movement of heavy equipment at the Mann USARC. These activities would disturb the surface soil, increasing the potential for soil erosion by wind or runoff. Impacts would be minor because appropriate sediment control measures would be applied in accordance with local regulations to reduce erosion. Geological hazards such as sinkholes, caves, mines, or quarries do not exist on or adjacent to the property. Seismic risk is relatively small.

4.2 Environmental Resources Analyzed in Detail

Seven resource areas, aesthetic and visual resources, air quality, hazardous and toxic substances, land use, noise, socioeconomics, and transportation, were identified for detailed analysis. The focus of detailed analysis is on those environmental resource areas that have the potential to be adversely impacted, could require new or revised permits, or have the potential for public concern.

4.2.1 Aesthetics and Visual Resources

4.2.1.1 Affected Environment

The Mann USARC property occupies approximately 7 acres with two permanent structures: a main administration building and an AMSA shop. The USARC property also contains two parking lots including an MEP area and POV parking. A chain-link security fence topped with

barbed wire encloses the MEP area and the AMSA building. Both the 27,237 square-foot main building and the 10,289 square-foot AMSA building were constructed on concrete foundations with concrete block walls covered with a brick veneer.

The main building is an irregular-shaped structure with one- and two-story administrative sections, and a 1 ½-story drill hall. The building's interior consists of office space, classrooms, a kitchen area, storage areas, a drill hall, and a mechanical room. The AMSA shop is a five-bay, one-story irregular-shaped structure with a second level mezzanine balcony. The AMSA shop was primarily used for vehicle maintenance. A vehicle wash area consisting of a concrete pad was located southeast of the AMSA shop (USACE 2007).

Construction of the administration building and AMSA shop occurred in 1953. An addition was added on the administration building in 1974. Since 1974, several renovations have occurred, but the configuration of the buildings has basically remained the same. The AMSA shop underwent a number of renovations, with the most recent being the addition of a metal rectangular structure in 2001.

The property is in an urban setting, is disturbed, and over 80 percent of the property is covered by impervious features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass.

The view from the property is dominated by a commercial and residential landscape. The dominant view to the north consists of single family homes and a commercial lot that contains several older used cars. East of the property is commercial development and the Hillyard Preschool. South of the property is commercial development and a Taco Bell. West of the property are single family homes. East Heroy Avenue, North Market Street, and North Haven Street surround the USARC property.

4.2.1.2 Consequences

Potential impacts to aesthetic and visual resources are considered significant if the proposed action would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

After performing an analysis of aesthetic and visual resources, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.1.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for aesthetic and visual resources are anticipated. Because the Mann 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 aesthetic and visual resources are anticipated. Because the Mann USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.2.1.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There would be moderate direct adverse impacts under this alternative. The vacant Mann USARC property is in poor condition due to the 2012 vandalism of the property. Although the caretaker would conduct periodic security patrols to insure public safety and security of the remaining government property, there is the potential for additional vandalism to occur at the Mann USARC. In addition, long-term caretaker status could result in a decrease in the frequency of mowing, weeding, and maintenance that may have a moderate adverse impact on aesthetic resources.

Indirect Impacts. There are no known indirect impacts to aesthetics and visual resources that would either occur later in time or farther removed in distance under this alternative.

4.2.1.2.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Direct Impacts. There would be minor, short- and long-term, direct impacts to aesthetics and visual resources under this alternative. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. If the existing building is renovated, short-term impacts would be negligible. There would be temporary construction debris and vehicles on the property, but it would be minimal since most of the renovations would be interior. Any modifications to existing buildings, and landscaping would be consistent with surrounding land uses and would result in negligible long-term direct impacts to the visual character of the property.

Minor short-term adverse direct impacts would be expected if the existing building is demolished and there is new construction of community facilities. Ground disturbance, tree clearing, demolition, and construction activities would result in minor, short-term adverse impacts to aesthetics and visual resources.

A potential for new or improved building(s) and landscaping would result in minor, long-term beneficial impacts to the visual character of the property. New construction would be accomplished in accordance with the City of Spokane comprehensive plan, design standards, and building and zoning codes, helping to ensure that facilities are compatible with their surroundings (City of Spokane 2002).

It is likely under this alternative that there would be more signage on buildings or at the entrances to the property. In addition, depending on the types of community uses incorporated in the final design, there is the potential that buildings may remain open later in the evening requiring more parking lot lighting and/or building lighting. These elements would change the existing visual landscape of the area and could result in minor, long-term impacts to the visual character of the property.

Indirect Impacts. There are minor long-term indirect impacts under this alternative. Long-term maintenance of a community development would likely mean more frequent mowing, weeding, and maintenance than under caretaker status, which would have a beneficial impact on aesthetic resources.

4.2.1.2.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Direct Impacts. There would be minor, short- and long-term, direct impacts to aesthetics and visual resources under this alternative. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. If the existing buildings are renovated, short-term impacts would be negligible. There would be temporary construction debris and vehicles on the property, but it would be minimal since most of the renovations would be interior. Any modifications to existing buildings and landscaping would be consistent with surrounding land uses and would result in negligible long-term direct impacts to the visual character of the property.

Ground disturbance, tree clearing, demolition, and construction activities would result in minor, short-term adverse impacts to aesthetics and visual resources if the existing building is demolished and there is new construction of businesses.

New or improved building(s) and landscaping would result in minor, long-term beneficial impacts to the visual character of the property. New construction would be accomplished in accordance with the City of Spokane comprehensive plan, design standards, and building and zoning codes, helping to ensure that facilities are compatible with their surroundings (City of Spokane 2002).

It is likely under this alternative that there would be more signage on buildings or at the entrances to the property. Buildings may also be taller than baseline conditions. The maximum building height for the Type 2 Center and Corridor – District Center zoning designation is 55 feet (Spokane Municipal Code 2005). In addition, depending on the types of businesses incorporated in the final design, there is the potential that businesses may remain open later in the evening requiring more parking lot lighting and/or building lighting. These elements would change the existing visual landscape of the area and could result in minor, long-term impacts to the visual character of the property.

Indirect Impacts. There would be minor long-term indirect impacts under this alternative. Long-term maintenance of a commercial development would likely mean more frequent mowing, weeding, and maintenance than under caretaker status, which would have a beneficial impact on aesthetic resources.

4.2.1.2.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Direct Impacts. There would be minor, short- and long-term, direct impacts to aesthetics and visual resources under this alternative. Direct impacts to aesthetics and visual resources under Alternative 5 would be similar to those under Alternative 4.

Indirect Impacts. There are minor long-term indirect impacts under this alternative. Indirect impacts to aesthetics and visual resources under Alternative 5 would be similar to those under Alternative 4.

4.2.2 Air Quality

4.2.2.1 Affected Environment

4.2.2.1.1 Ambient Air Quality Conditions

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 (42 USC 7401-7671q) required the USEPA to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality throughout the United States.

Individual states can adopt the NAAQS or establish state ambient air quality standards, which cannot be less stringent than the NAAQS. The Washington State Department of Ecology has adopted the NAAQS.

Both primary and secondary NAAQS are defined. The primary NAAQS are intended to protect public health, while the secondary NAAQS are intended to protect the environment (e.g., crops, wildlife, buildings). Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in “attainment” for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a “non-attainment” area for that pollutant. Areas in non-attainment for three of the criteria pollutants (ozone, carbon monoxide, and particulate matter equal or less than 10 microns in size) are classified according to severity.

The USEPA requires each state to prepare a State Implementation Plan (SIP) to bring non-attainment areas into attainment status. When an area is designated non-attainment, an attainment SIP must be developed and submitted to the EPA within 3 years. An SIP is a compilation of goals, strategies, source emission limitations and control requirements, schedules, and enforcement actions that would lead the state to compliance with all NAAQS. Maintenance areas are areas that were previously designated as non-attainment, but are currently in attainment. Once an area is designated as in maintenance, the state submits a maintenance SIP to provide for the maintenance in the area of concern to ensure the area will meet the NAAQS for a 20 year period. The initial maintenance SIP covers 10 years and then it is revised and resubmitted to cover another 10-year period.

4.2.2.1.2 Air Pollutant Emissions at Installation

The property is located within a maintenance area (Spokane County, Washington) for carbon monoxide and for particulate matter <10 micrograms (WSDOE 2013). Spokane County is in attainment for all other NAAQS criteria pollutants, i.e., ozone, particulate matter <2.5 micrograms, sulfur dioxide, nitrogen dioxide, and lead. Emission sources at the property include stationary, mobile, and fugitive categorizations. Potential stationary sources include boilers in the main reserve center and AMSA buildings.

4.2.2.1.3 Regional Air Pollutant Emissions Summary

The General Conformity Rule , 40 CFR Part 93 Subpart B, requires an assessment of the potential magnitude of total direct and indirect emissions of non-attainment criteria pollutants associated with a proposed federal action when determining conformity of that action. The rule does not apply to certain “exempt” actions or to actions where the total direct and indirect emissions of criteria pollutants are at or below specified *de minimis* levels. Using emission

factors from USEPA's Clearinghouse for Inventories and Emission Factors, emission calculations from associated demolition, construction, and reuse activities demonstrate air emission levels were compiled for each alternative. The resulting calculations were well below *de minimis* levels (100 tons/year) for CO and PM₁₀ set by the conformity rule. Appendix B contains the assumptions and emissions calculations for each alternative, the Record of Non-Applicability (RONA), and a discussion of the general air conformity process.

4.2.2.2 Consequences

Potential impacts to air quality are considered significant if the Proposed Action would:

- Increase ambient air pollution above any NAAQS;
- Contribute to an existing violation of any NAAQS;
- Interfere with or delay timely attainment of NAAQS;

After performing an analysis of air quality, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.2.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for air quality resources are anticipated. Because the Mann 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 air quality resources are anticipated. Because the Mann USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.2.2.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There would be short-term, non-significant, beneficial direct impacts under Alternative 2. Under this alternative, the Army would provide for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of property. Most recently, the property had approximately 10 full time staff at the Mann USARC on a daily basis with up to 90 reservists one weekend per month. Following closure, there has been a reduction of mobile emissions from government vehicles and POVs. The only on-site vehicles are for minimal maintenance activities. During the implementation of caretaker status, there would be emissions from the vehicles and equipment needed to perform maintenance activities on-site.

During the implementation of caretaker status there would be a reduction in air emissions associated with the operation of the natural gas boilers. While in caretaker status, the existing buildings would not require heating and cooling for human comfort; consequently, emissions associated with heating and cooling would be reduced.

Indirect Impacts. There are no measurable anticipated indirect impacts under this alternative because following the closure and during implementation of caretaker status, there would be a net decrease in emissions since there would be no operations occurring at the property.

4.2.2.2.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Direct Impacts. Short-term, non-significant, adverse direct impacts would be expected under Alternative 3. The primary emission sources for this project will be those associated with construction and renovation activities. Cumulative air emissions were calculated for various types of diesel engine vehicles and related equipment that are commonly used during construction and renovation projects. Under this alternative, there may be either renovation and reuse of the existing building or demolition and new construction. The calculations and results in Appendix B are for demolition and new construction activities since that option would generate the most emissions.

If renovation activities occur, they would be mostly interior repairs and painting. The renovation activities associated with this modification would result in a short-term negligible increase in air emissions. If the building is demolished and new construction occurs, there would be a short-term minor increase in air emissions as demonstrated in the calculations shown in Appendix B. Emissions would be created from the demolition, site preparation, new building construction, and concrete and asphalt paving. There would also be additional mobile emissions from commuting construction workers and construction equipment.

It is anticipated that the Grantee would use the boiler system in a renovated building at the same duration and capacity as the current use but during different times that may include more evening and weekend use. If new construction occurs, there would be a change in stationary source emissions from a new boiler. The increase would be negligible because it is anticipated that a new, modern boiler would operate much more efficiently than the current boiler. There would be an increase in mobile source emissions in the vicinity. Most recently, the property had approximately 10 full time staff at the Mann USARC on a daily basis with up to 90 soldiers on one weekend per month whose vehicles would no longer contribute emissions to the area. The reuse by the Grantee would increase traffic in the area. According to the roadways and traffic analysis in Section 4.2.7, the reuse as a community center would generate between 342 to 1,026 vehicle trip ends with renovation of the existing building and 2,187 to 6,561 vehicle trip ends with demolition and new construction. For purposes of this analysis, the calculations in Appendix B used the low end of the proposed traffic generation for new construction because of the smaller population size of Spokane in relation to other metropolitan areas. There would be a minor increase in air emissions from the additional mobile sources under this alternative.

Indirect Impacts. No indirect impacts to air quality would be expected under Alternative 3 because on-site emissions are directly related to the addition of vehicle emissions and construction related activities. No additional impacts are expected beyond the direct impacts noted above.

4.2.2.2.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Direct Impacts. Short-term, non-significant, adverse direct impacts would be expected under Alternative 4. The primary emission sources for this project would be those associated with construction and renovation activities. Cumulative air emissions were calculated for various types of diesel engine vehicles and related equipment that are commonly used during

construction and renovation projects. The results of these calculations are located in Appendix B.

Renovation activities would be the same as those described under Alternative 3. Emissions from demolition and new construction would be similar to those under Alternative 3; however, the total emissions would be greater. There would be more new construction, which would require more workers and equipment. There would be a short-term moderate increase in air emissions as demonstrated in the calculations shown in Appendix B.

It is anticipated that the Grantee would use the boiler system in a renovated building at the same duration and capacity as the current use but during different times that may include more evening and weekend use. If new construction occurs, there would be a change in stationary source emissions from multiple new boilers since this alternative includes the potential construction of both commercial businesses and residences. The increase would be minor. Although the new boiler would operate much more efficiently, there would be multiple boilers operating under this alternative. There would be an increase in mobile source emissions in the vicinity. Most recently, the property had approximately 10 full time staff at the Mann USARC on a daily basis with up to 90 soldiers on one weekend per month whose vehicles would no longer contribute emissions to the area. The reuse by the Grantee would increase traffic in the area. According to the roadways and traffic analysis in Section 4.2.7, the reuse as a community center would generate between 148 to 1,634 vehicle trip ends with renovation of the existing building and 2,804 to 30,143 vehicle trip ends with demolition and new construction. For purposes of this analysis, the calculations in Appendix B used the low end of the traffic generation ranges because of the smaller population size of Spokane in relation to other metropolitan areas. There would be a moderate increase in air emissions from the additional mobile sources under this alternative.

4.2.2.2.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Direct Impacts. Short-term, non-significant, adverse direct impacts would be expected under Alternative 5. The primary emission sources for this project will be those associated with construction and renovation activities. Cumulative air emissions were calculated for various types of diesel engine vehicles and related equipment that are commonly used during construction and renovation projects. The results of these calculations are located in Appendix B.

Renovation, demolition, and new construction activities would be the same as those described under Alternative 3. It is anticipated that the Grantee would use the boiler system in a renovated building at the same duration and capacity as the current use but during different times that may include more evening and weekend use. If new construction occurs, there would be change in stationary source emissions from a new boiler. The increase would be negligible because it is anticipated that a new, modern boiler would operate much more efficiently than the current boiler. There would be a slight increase in mobile source emissions in the vicinity. Most recently, the property had approximately 10 full time staff at the Mann USARC on a daily basis with up to 90 soldiers on one weekend per month whose vehicles would no longer contribute emissions to the area. The reuse by the Grantee would increase traffic in the area. According to the roadways and traffic analysis in Section 4.2.7, the reuse as a community center would generate anywhere from 152 to 206 vehicle trip ends with renovation of the existing building and

972 to 1,701 vehicle trip ends with demolition and new construction. For purposes of this analysis, the calculations in Appendix B used the lowest end of the new construction traffic generation range because of the smaller population size of Spokane in relation to other metropolitan areas. There would be a minor increase in air emissions from the additional mobile sources under this alternative.

4.2.3 Hazardous and Toxic Substances

4.2.3.1 Affected Environment

An ECP Report was completed for the Mann USARC in March 2007 (USACE 2007). This document details the history of the property, including the U.S. Army Reserve and any prior tenant uses of the property and the resulting environmental condition of the property. An update to the ECP was completed in September 2010. The sections below include a summary of the information contained in the two ECP documents that pertains to asbestos-containing material (ACM), lead-based paint (LBP), and lead dust. Impact analysis for other hazardous and toxic substances can be found in Section 4.1 – Environmental Resources Eliminated from Further Considerations.

4.2.3.1.1 Asbestos-Containing Material

Asbestos surveys conducted in 1994 and 2003 concluded that confirmed friable and non-friable ACM is located in the Mann USARC main building. The ACM includes floor tile and mastic, glue dots associated with ceiling tile, and vibration dampers associated with the ventilation systems (USACE 2007; Thermatech Northwest, Inc. 2003; AGI Technologies 1994). Asbestos in the vibration dampers was identified as friable in the report. According to USARC site personnel, the friable asbestos identified during the 2003 survey was removed (Schell 2012). The 2003 survey found no ACM in the AMSA shop.

During the September 2006 ECP site visit, facility personnel indicated that there had been a recent water pipe break in the administration building boiler room. The insulation in the area of the break had been damaged. In addition, areas of loose or missing floor tiles were observed in the vent/air conditioning room in the administration building (USACE 2007). As a result of vandalism in 2012, there may be areas where friable or non-friable ACM was previously covered but is now exposed.

4.2.3.1.2 Indoor Firing Range

Historically, an indoor firing range was located in the basement of the main building. The former indoor firing range was cleaned and clearance sampling conducted in 2001. All wipe sample results indicated that residual lead levels in the range were below the clearance level of 200 micrograms per square foot ($\mu\text{g}/\text{sf}$) (IT Corporation 2001), a value that would release the indoor range as a room that could be reoccupied as a non-lead work area for adults. However, the federal lead dust threshold for occupation by children under the age of six is 40 $\mu\text{g}/\text{sf}$, and several samples obtained during the range cleaning activities exceeded this threshold (IT Corporation 2002). The area was remodeled after 2001 and was used for training with multiple computer workstations.

4.2.3.1.3 Lead-Based Paint

An LBP survey of the main building and AMSA shop was completed in 2003 (USACE 2007). LBP was identified in both buildings with the highest amounts in red primers used on metal railings in stairwells and in orange primers used in doorframes in the main building. High concentrations of lead were also present on the roll-up doors in the AMSA shop.

4.2.3.2 Consequences

4.2.3.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for hazardous and toxic substances are anticipated. Because the Mann USARC would not close and personnel would not be realigned, no direct impacts to hazardous and toxic substances are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for hazardous and toxic substances are anticipated. Because the Mann USARC would not close and personnel would not be realigned, no indirect impacts to hazardous and toxic substances are anticipated.

4.2.3.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Negligible short-term beneficial direct impacts are expected from hazardous and toxic substances under this alternative. The Army would continue maintenance activities necessary to protect the property and buildings from deterioration. No remedial activities (*e.g.*, removal of remaining ACM, LBP or lead dust abatement) would be performed by the Army under this alternative. Any remaining small quantities of hazardous and toxic substances (*e.g.*, janitorial chemicals, vehicle maintenance products, and building maintenance-related products) have been disposed of by the Army in accordance with federal, state, local, and DoD requirements after closure of the Mann USARC. The removal of these hazardous and toxic substances would result in a negligible short-term beneficial impact.

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

4.2.3.2.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Direct Impacts. There would be no significant impacts resulting from this proposed action. No remedial activities (*e.g.*, removal of remaining ACM, LBP, or lead dust abatement) would be performed by the Army prior to the transfer of property because the Army typically performs remedial activities necessary only to transfer the property for a “like use”. The 2007 ECP and the 2010 ECP Update categorized the property as an ECP Category Type 2 property which is defined as an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred (USACE 2007, U.S. Army 2010, 88th RSC 2011). Hazardous and toxic substances disposal activities would be in accordance with federal, state, local, and DoD requirements. Minor long-term beneficial impacts are anticipated with the proper removal of these materials from the property.

Any remaining ACM, LBP, and lead dust would not present a threat to human health or the environment because the Grantee would agree via a deed covenant to undertake any abatement or remediation due to ACM, LBP, and lead dust that would be required under applicable laws and regulations at no cost to the Army. The Grantee's use would be in compliance with all applicable laws and regulations relating to ACM, LBP, and lead dust. In addition, the Occupational Safety and Health Administration Construction Industry Standard for Lead (29 CFR 1926.62) would be reviewed before any activities on wall and floor surfaces that may cause a release of dust are undertaken.

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

4.2.3.2.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Direct Impacts. Impacts under this alternative would be similar to those described under Alternative 3. There would be no significant impacts resulting from this proposed action. No remedial activities (e.g., removal of remaining ACM, LBP, or lead dust abatement) would be performed by the Army prior to the transfer of property. Any remaining ACM, LBP, and lead dust would not present a threat to human health or the environment because the Grantee would agree via a deed covenant to undertake any abatement or remediation due to ACM, LBP, and lead dust that would be required under applicable laws and regulations at no cost to the Army. In addition, the Grantee's use would be in compliance with all applicable laws and regulations relating to ACM, LBP, and lead dust.

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

4.2.3.2.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Direct Impacts. Impacts under this alternative would be similar to those described under Alternative 3. There would be no significant impacts resulting from this proposed action. No remedial activities (e.g., removal of remaining ACM, LBP, or lead dust abatement) would be performed by the Army prior to the transfer of property. Any remaining ACM, LBP, and lead dust would not present a threat to human health or the environment because the Grantee would agree via a deed covenant to undertake any abatement or remediation due to ACM, LBP, and lead dust that would be required under applicable laws and regulations at no cost to the Army. In addition, the Grantee's use would be in compliance with all applicable laws and regulations relating to ACM, LBP, and lead dust.

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

4.2.4 Land Use

4.2.4.1 Affected Environment

The Mann USARC is located in Spokane County, on the northeastern side of the City of Spokane, Washington (Figures 1-1 and 1-2). The property occupies approximately 7 acres and is

located on the U.S. Geological Survey (USGS) 7.5-Minute Spokane NE, Washington Quadrangle map.

4.2.4.1.1 Current and Future Development in the Region of Influence

The Mann USARC falls under the City of Spokane's Northeast Development Target Area, a development project for which the City assists in developing infrastructure projects and incentive programs (NEPDA 2012). The Northeast Development Target Area is part of the City of Spokane's Comprehensive Plan and the Greater Hillyard Neighborhood Plan for industrial and manufacturing development/redevelopment and job creation.

As part of the development of the Northeast Development Target Area, the City committed approximately \$5 million in 2009 for streetscape improvements to Market Street, which borders the USARC property to the east. These initial improvements to Market Street garnered another \$17 million from public and private funds to revitalize streets, sidewalks, trees, lighting, and water and sewer connections on and along Market Street (HUD 2013).

Future development within the Northeast Development Target Area includes the construction of the US 395 North Spokane Corridor (NSC), which will run approximately 0.35 mile from the USARC property. This new corridor will provide a link between US 2/US 395 to Interstate 90, which will provide a north-south trade route through Spokane (WSDOT 2009). Additionally, the completion of the US 395 NSC will contribute to the completion of a North American Free Trade Agreement (NAFTA) highway that allows for expanded freight transport among Canada, the United States, and Mexico. Over the next 10 years, this new corridor is expected to attract major industrial and manufacturing development to the region (City of Spokane 2010). The Northeast Public Development Authority was created to help facilitate this development by helping to create public-private partnerships and assisting with financing for economic development activities (NEPDA 2012).

4.2.4.1.2 Installation Land

The Mann USARC contains two permanent structures: a 27,237 square-foot main administration building and a 10,289 square-foot AMSA building. The property also contains two parking lots including a POV parking area and a fenced in MEP area. Approximately 80 percent of the property is covered by impervious surfaces such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass.

The Mann USARC was most recently occupied by the 981st Medical Detachment, 396th Medical Detachment, 22nd Legal Defense Organization Trial Defense Services, 643rd (Training), and AMSA #80. The USARC primarily functioned as an administrative, storage, vehicle maintenance, and medical training facility and was also used by reservists for training and drill activities on various weekends throughout the year.

In the Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act (2006), Table 4-1, titled Land Use Intensity Parameters, characterizes land use by using intensity parameters to evaluate how intensely a site will be reused. A FAR is used to determine the intensity level of a reuse based on how much building development occurs at a site or across an area. Based on the current total building area (approximately 37,526 square feet) on the USARC property (7 acres or approximately 304,920 square feet) there is a 0.12 FAR, which is a medium intensity level use.

The property is zoned by the City of Spokane as CC2-DC, Type 2 Center and Corridor – District Center, a district that allows for residential, recreational, government and public services, educational, religious institutions, office, retail, and light industrial uses (Pelton, Personal Communication 2013). The Type 2 center and corridor zone promotes new development and redevelopment that is pedestrian oriented while accommodating automobiles. Incentives allowing a higher FAR in exchange for the provision of greater public amenities as land is developed and redeveloped are encouraged in these areas (Spokane Municipal Code 2005).

4.2.4.1.3 Surrounding Land

The land use surrounding the Mann USARC is primarily mixed commercial and residential. North of the property are single family homes and a commercial lot that contains used cars. East of the property is a commercial development and the Hillyard Preschool. South of the property is a commercial development that includes retail businesses and a Taco Bell restaurant. West of the property are single family homes. The USARC property is bordered by East Heroy Avenue to the north, North Market Street to the east, and North Haven Street to the west.

4.2.4.2 Consequences

Potential impacts to land use are considered significant if the Proposed Action would:

- Conflict with applicable ordinances and/or permit requirements;
- Cause nonconformance with the current general plans and land use plans, or preclude adjacent or nearby properties from being used for existing activities; or
- Conflict with established uses of an area requiring mitigation.

After performing an analysis of land use, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.4.2.1 Alternative 1 – No Action Alternative

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

4.2.4.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There are no known direct impacts to land use under this alternative. The Mann USARC property would continue to contain two permanent structures, two parking areas, and maintained grass under this alternative, and maintenance activities are expected to continue for the existing facilities. The former occupants of the USARC property have been relocated, but this would have no impacts on land use in the area.

Indirect Impacts. There would be moderate indirect adverse impacts to surrounding land use and current and future development in the region of influence under the Caretaker Status Alternative. The vacant Mann USARC property is in poor condition due to the 2012 vandalism

of the property. Therefore, long-term caretaker status could result in a decrease in the successful development and use of surrounding properties because the facility is in disrepair and creates an eyesore for the community.

4.2.4.2.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Direct Impacts. There would be minor beneficial direct impacts to land use under this alternative. Land use would change from training and administrative activities associated with national defense to full build-out as a community and educational facility.

Based on the current total building area (approximately 37,526 square feet) on the property (7 acres or approximately 304,920 square feet) there is a 0.12 FAR, which is a medium intensity level use. Section 17C.122.070 of the Spokane Municipal Code allows for a basic allowable nonresidential FAR of 0.2. If development projects incorporate specified and described public amenities, the FAR may be increased up to a maximum nonresidential use of 0.8. Under Alternative 3, a high intensity level reuse (>0.7 FAR) with a maximum FAR of 0.8 will be analyzed for development of the property as a community facility. Although the land use intensity would increase under this alternative, the reuse of the site would result in a beneficial use of the land for local residents and the community by providing a community facility for local residents.

There would be no changes to zoning under this alternative. The reuse as a community facility is compatible with the CC2-DC, Type 2 Center and Corridor – District Center zoning designation. Community uses under this zoning designation include, but are not limited to, government, public services, social services, and education services. The Grantee would comply with federal, state, and local laws and would obtain any applicable construction and zoning permits or other required permits associated with renovation and new construction on the property.

The reuse as a community facility would be compatible with the surrounding mixed commercial and residential uses and would comply with the City of Spokane’s Comprehensive Plan (City of Spokane 2012a). This use would support a social need in the area.

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.

4.2.4.2.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Direct Impacts. There would be minor beneficial direct impacts to land use under this alternative. Land use would change from training and administrative activities associated with national defense to full build-out as commercial.

Based on the current total building area (approximately 37,526 square feet) on the property (7 acres or approximately 304,920 square feet) there is a 0.12 FAR, which is a medium intensity level use. Section 17C.122.070 of the Spokane Municipal Code allows for a basic allowable nonresidential FAR of 0.2 and residential FAR of 0.5 for a total basic allowable FAR of 0.7. If development projects incorporate specified and described public amenities, the FAR may be increased up to a maximum nonresidential use of 0.8 and a residential use of 1.5 for a total maximum combined FAR with public amenities of 2.3. Under Alternative 4, a high intensity

level reuse (>0.7 FAR) with a maximum FAR of 2.3 will be analyzed for development of the property for commercial use. Although the land use intensity would increase under this alternative, the reuse of the site would result in a beneficial use of the land for local residents and the community by providing expansion of employment and retail activities.

There would be no changes to zoning under this alternative. The reuse as commercial is compatible with the CC2-DC, Type 2 Center and Corridor – District Center zoning designation. Commercial uses under this zoning designation include, but are not limited to, commercial, financial, retail, personal services, hotels, restaurants, wineries and microbreweries, entertainment, museum, and cultural, professional and medical offices, motor vehicle sales, rental, repair, or washing, gasoline sales, automotive parts and tires, and self-storage or warehouse. The Grantee would comply with federal, state, and local laws and would obtain any applicable construction and zoning permits or other required permits associated with renovation and new construction on the property.

The reuse as a community facility would be compatible with the surrounding mixed commercial and residential uses. It would comply with the City of Spokane’s Comprehensive Plan and land use plan map, which designate the USARC property as a district center, having a wide range of retail and service activities including general merchandising, small specialty shops, personal and professional services, offices, food, and entertainment (City of Spokane 2012a; City of Spokane 2012b).

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.

4.2.4.2.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Direct Impacts. There would be minor beneficial direct impacts to land use under this alternative. Land use would change from training and administrative activities associated with national defense to full build-out as limited industrial/manufacturing.

Based on the current total building area (approximately 37,526 square feet) on the property (7 acres or approximately 304,920 square feet) there is a 0.12 FAR, which is a medium intensity level use. Section 17C.122.070 of the Spokane Municipal Code allows for a basic allowable nonresidential FAR of 0.2. If development projects incorporate specified and described public amenities, the FAR may be increased up to a maximum nonresidential use of 0.8. Under Alternative 5, a high intensity level reuse (>0.7 FAR) with a maximum FAR of 0.8 will be analyzed for development of the property for light industrial/manufacturing use. Although the land use intensity would increase under this alternative, the reuse of the site would result in a beneficial use of the land for local residents and the community by providing expansion of employment and limited industrial/manufacturing activities.

There would be no changes to zoning under this alternative. The reuse as limited industrial/manufacturing is compatible with the CC2-DC, Type 2 Center and Corridor – District Center zoning designation. Industrial and manufacturing uses under this zoning designation are allowed if on-site activities are entirely conducted within a building. Heavy industrial uses are not allowed. The Grantee would comply with federal, state, and local laws and would obtain any applicable construction and zoning permits or other required permits associated with renovation and new construction on the property.

The reuse as a community facility would be compatible with the surrounding mixed commercial and residential uses and would comply with the City of Spokane’s Comprehensive Plan (City of Spokane 2012a).

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.

4.2.5 Noise

4.2.5.1 Affected Environment

Sounds that disturb people or make it difficult to hear wanted sounds are commonly called noises. Human response to noise can be subjective and varied depending on the distance from noise source, time of day, receptor sensitivity, and the type and characteristic of the noise.

Noise can vary in terms of frequency and intensity and can span several orders of magnitude. The human response to noise is a function not only of the maximum level of the sound, but also the duration of the event. Sounds that occur over a long period of time are more likely to be an annoyance or cause environmental stress. A decibel (dB) is the unit commonly used to measure and describe sound levels. Sound measurement is further refined by using an “A-weighted” decibel (dBA) scale that emphasizes the audio frequency range audible to humans. Thus, the dBA measurement more closely describes how a person perceives sound. For example, typical noise levels include: a quiet urban nighttime (40 dBA), an air conditioner operating 100 feet away (55 dBA), and a heavy truck moving 50 feet away (85 dBA).

Equipment noise is normally measured over an 8-hour time period, using the equivalent sound level (Leq). The Leq is obtained by averaging dBA sound levels over a selected time period. Another descriptor of a noise environment over extended periods of hours or days is the day-night average sound level (DNL). To compute a DNL, single noise events are measured using an A-weighted scale with allowances added for the number of events and the time of day. A 10-dB penalty is added for noise that occurs between the hours of 10 p.m. and 7 a.m. because nighttime noise events are considered more annoying than noise occurring during daytime. The DNL descriptor is accepted by federal agencies as a standard for estimating noise impact and establishing guidelines for compatible land uses. Table 4.2 shows noise levels for various human activities.

Sound Level (dBA)	Maximum Exposure Limits	Source of Noise	Subjective Impression
10			Threshold of hearing
20		Still recording studio; Rustling leaves	
30		Quiet bedroom	
35		Soft whisper at 5 feet (ft) ; Typical library	
40		Quiet urban setting (nighttime); Normal level in home	Threshold of quiet
45		Large transformer at 200 ft	

Table 4-2 Typical Decibel Levels Encountered in the Environment and Industry

Sound Level (dBA)	Maximum Exposure Limits	Source of Noise	Subjective Impression
50		Private business office; Light traffic at 100 ft; Quiet urban setting (daytime)	
55		Window air conditioner; Men's clothing department in store	Desirable limit for outdoor residential area use (EPA)
60		Conversational speech; Data processing center	
65		Busy restaurant; Automobile at 100 ft	Acceptable level for residential land use
70		Vacuum cleaner in home; Freight train at 100 ft	Threshold of moderately loud
75		Freeway at 10 ft	
80		Ringling alarm clock at 2 ft; Kitchen garbage disposal; Loud orchestral music in large room	Most residents annoyed
85		Printing press; Boiler room; Heavy truck at 50 ft	Threshold of hearing damage for prolonged exposure
90	8 hr	Heavy city traffic	
95	4 hr	Freight train at 50 ft; Home lawn mower	
100	2 hr	Pile driver at 50 ft; Heavy diesel equipment at 25 ft	Threshold of very loud
105	1 hr	Banging on steel plate; Air hammer	
110	0.5 hr	Rock music concert; Turbine condenser	
115	0.25 hr	Jet plane overhead at 500 ft	
120	< 0.25 hr	Jet plane taking off at 200 ft	Threshold of pain
135	< 0.25 hr	Civil defense siren at 100 ft	Threshold of extremely loud

Source: U.S. Army, 1978

The Noise Control Act (NCA) of 1972 directs federal agencies to comply with federal, state, and local noise control regulations. While primary responsibility for control of noise rests with State and local governments, EPA is directed by Congress to coordinate the programs of all federal agencies relating to noise research and noise control. Noise issues are typically handled at the state and local level.

The City of Spokane Municipal Code places restrictions relating to noise (Spokane Municipal Code, Title 10 – Regulation of Activities, Chapter 10.08D Noise Control, Section 10.08D.070 Maximum Permissible Environmental Sound Levels). Maximum permissible sound levels are shown in Table 4-3.

Table 4-3 City of Spokane Maximum Permissible Sound Levels			
Environmental Designation for Noise Abatement (EDNA) of Noise Source	EDNA of Receiving Property		
	Class A* (dBA)	Class B (dBA)	Class C (dBA)
Class A	55	57	60
Class B	57	60	65
Class C	60	65	70
Class A – Residential Zones Class B – Commercial, Office, Retail Zones Class C – Industrial Zones *Reduce by 10 dBA between the hours of ten p.m. to seven a.m. for receiving property in Class A EDNAs			
<i>Source: City of Spokane Municipal Code, 2013a</i>			

When in operation, the major sources of noise at the Mann USARC were generated by the daily use of the heating, ventilation, and air conditioning (HVAC) system, automobiles, trucks, and vehicle maintenance and repair activities. Noise levels attributed to the USARC property are compatible with surrounding land use and do not have adverse impacts on adjacent residential and commercial areas.

Surrounding noise is generated by residential and commercial activities. Typical background levels of noise in urban residential areas range from 55 dBA to 70 dBA (USEPA 1978). Vehicle noise can be attributed to East Heroy Avenue to the north, North Haven Street to the west, and North Market Street to the east. Both North Haven Street and North Market Street are principal arterial roads with an average of between 14,000 to 16,000 vehicles each per 24-hour period (City of Spokane 2010). There are bus stops adjacent to the USARC property. Other noise sources include commercial development and fast food restaurants south and east of the property. The nearest sensitive noise receptors are numerous individual private residences just north and west of the USARC and a preschool east of the property.

4.2.5.2 Consequences

Effects to the noise environment are considered significant if the proposed action would:

- Conflict with applicable federal, state, interstate, or local noise control regulations; or
- Result in continuous and long-term noise levels that are ≥ 85 dB, which is the threshold of hearing damage with prolonged exposure.

After performing an analysis of noise, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.5.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of noise are anticipated. Because the Mann USARC would not close and personnel would not be realigned, no direct impacts from noise are anticipated. Noise levels from vehicle operations would continue at baseline levels.

Indirect Impacts. No changes to the existing baseline conditions of noise are anticipated. Because the Mann USARC would not close and personnel would not be realigned, no indirect impacts from noise are anticipated. Noise levels from vehicle operations would continue at baseline levels.

4.2.5.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Negligible beneficial impacts to noise would occur under this alternative. If the Army finds it necessary to place the Mann USARC in caretaker status for an indefinite period, the Army's policy is to ensure public safety and security of the remaining government property. Maintenance activities are expected to continue for the buildings, grounds, and paved areas. It is likely caretaker activities would result in noise levels below baseline levels. Reduced noise levels would occur throughout the period of caretaker status. Any maintenance activities required under caretaker status would be similar to baseline activities at the Mann USARC.

Indirect Impacts. No indirect impacts due to noise are anticipated as compared to baseline conditions as changes in noise levels would be limited to on-site caretaker activities, which would not occur at a later time or farther removed in distance.

4.2.5.2.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Direct Impacts. There would be negligible to minor short-term adverse and negligible long-term adverse impacts from noise due to the change in noise levels associated with the reuse of the Mann USARC for a community facility. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. Negligible short-term adverse direct impacts would be expected from the renovation of the existing building. Construction noise, including equipment noise, is expected to be minimal under this alternative. The renovation would be mainly interior work that includes, but is not limited to, painting, new carpeting, new drywall, updates to bathrooms, updates and repairs to electrical and HVAC systems.

Minor short-term adverse direct impacts would be expected if the current USARC buildings are demolished and a new facility is constructed. Construction noise, including equipment noise, typically does not contribute substantially to long-term average noise levels, but consists of frequent, highly intrusive sounds of 87 to 96 dBA (Suter 2002). To reduce impacts associated with noise levels, best management practices (BMPs), including limiting construction activities to between 7:00 am and 10:00 pm (City of Spokane Municipal Code 2013a) and ensuring construction equipment mufflers are properly maintained and are in good working condition, would be used.

Negligible long-term adverse direct impacts would occur based on the future use of the Mann USARC property as a community education center. The USARC was previously occupied by 10

people on a daily basis during normal business hours and 90 people training there one weekend per month. During the reuse, there is the potential for additional people and vehicles during the day as well as more weekend and evening use, which could produce more noise than baseline. However, the noise of a community facility would be consistent with the noise levels of adjacent commercial and residential properties and the adjacent principal arterial roads. Noise levels would comply with applicable federal, state, interstate, or local noise control regulations.

Indirect Impacts. No indirect impacts from noise are anticipated, as there would be no changes to noise levels on adjacent properties or at a distance from the reuse as a result of this action.

4.2.5.2.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Direct Impacts. Under Alternative 4 there would be negligible to minor short- and long-term adverse impacts from noise due to the change in noise levels associated with the reuse of the Mann USARC for full build-out as commercial. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. Short-term impacts under Alternative 4 would be similar to those listed under Alternative 3.

Minor long-term adverse direct impacts would occur based on the future use of the Mann USARC property as full build-out as commercial. The surrounding properties have mostly residential and commercial land uses; therefore, the presence of more businesses may increase noise levels over baseline levels due to increased business traffic volume. Traffic noise would be variable throughout the day with possible increased traffic noise during work/commute times, in the evenings, and on weekends. Noise levels would comply with applicable federal, state, interstate, or local noise control regulations and would be compatible with surrounding land use.

Indirect Impacts. No indirect impacts on noise are anticipated, as there would be no changes to noise levels on adjacent properties or at a distance from the reuse as a result of this action.

4.2.5.2.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Under Alternative 5 there would be negligible to minor short- and long-term adverse impacts to noise due to the change in noise levels associated with the reuse of the Mann USARC for full build-out as limited industrial/manufacturing. The Army used the USARC property at a medium intensity level; the reuse of the property for a limited industrial/manufacturing development could increase the intensity level to high. To accommodate the potentially higher intensity level, the reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. Short-term impacts under Alternative 5 would be similar to those listed under Alternative 3.

Minor long-term adverse direct impacts would occur based on the future use of the Mann USARC property as full build-out limited industrial/manufacturing. The surrounding properties have mostly residential and commercial land uses; therefore, the presence of industry or manufacturing may increase noise levels over baseline levels due to increased traffic volume from trucks, including semi-trailer trucks, and commuting vehicles. Traffic noise would be variable throughout the day with possible increased traffic noise during work/commute times. Limited industrial uses are allowed in this zoning district if on-site activities are entirely conducted within a building, so potential long-term mechanical noise levels would be contained

within buildings and would not affect surrounding properties. Noise levels would comply with applicable federal, state, interstate, local, and/or occupational noise control regulations.

Indirect Impacts. No indirect impacts on noise are anticipated, as there would be no changes to noise levels on adjacent properties or at a distance from the reuse as a result of this action.

4.2.6 Socioeconomics

4.2.6.1 Affected Environment

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

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

The Mann USARC is located in the Spokane, Washington Metropolitan Statistical Area (MSA), which is the ROI for this socioeconomic analysis. The Spokane, Washington MSA is comprised of Spokane County.

4.2.6.1.1 Economic Development

Local Economic Activity

The Mann USARC was most recently occupied with 10 full time employees and 90 reservists that trained at the facility one weekend a month. Expenditures by employees were spent in the local economy.

Regional Economic Activity

Spokane serves as the regional hub of a 36-county area known as the Inland Northwest that encompasses parts of Washington, Idaho, Montana, and Oregon (City of Spokane 2012a). Historically, the region's economy was based on natural resource-timber, agriculture, and mining. In the last 20 years, the region has diversified to include high tech and service industries. Unemployment in the region has been on the decline since the recession; however, some of this decline may be attributed to a decline in the labor force. Since 2009, the labor force has shrunk by approximately 3 percent. Labor force information and unemployment rates for the county, state, and nation are shown in Tables 4-4 and 4-5.

Jurisdiction	2008	2009	2010	2011	2012
Spokane, WA MSA	238,307	238,026	235,293	230,702	229,965
Washington	3,473,010	3,523,739	3,516,008	3,482,239	3,481,463
United States	154,287,000	154,142,000	153,889,000	153,617,000	154,975,000

Source: Bureau of Labor Statistics 2008, 2009a, 2009b, 2010, 2011a, 2011b, 2012a, and 2012b

Jurisdiction	2008	2009	2010	2011	2012
Spokane, WA MSA	5.6	9.2	9.9	9.3	8.6
Washington	5.4	9.4	9.9	9.2	8.2
United States	5.8	9.3	9.6	8.9	8.1

Source: Bureau of Labor Statistics 2008, 2009a, 2009b, 2010, 2011a, 2011b, 2012a, and 2012b

Wholesale and retail trade, education and health services, and government are the region's top industries as shown on Table 4-6. The top employers in the Spokane area include the State of Washington, Spokane Public Schools, Providence Sacred Heart Medical Center and Children's Hospital, and the 92nd Air Refueling Wing and Fairchild Air Force Base. All of the top employers have between 2,800-4,200 full time employees (Greater Spokane Incorporated 2013a).

Industry	2010 Annual Average (persons)	2011 Annual Average (persons)	2010-2011 Percent Change
Ag/Natural and Resources Mining	1,047	1,120	6.9
Construction	13,934	13,352	(4.2)
Manufacturing	14,512	14,892	2.6
Trade (Wholesale and Retail)	41,251	40,984	(0.6)
Transportation and Utilities	7,848	8,016	2.1

Table 4-6 Non-Agricultural Wage and Salary Employment by NAICS Industry for the Spokane, WA MSA (2011, 2012)			
Industry	2010 Annual Average (persons)	2011 Annual Average (persons)	2010-2011 Percent Change
Information	3,594	3,538	(1.6)
Finance, Insurance, and Real Estate	26,741	27,186	1.7
Professional and Business Services	30,414	31,733	4.3
Education and Health Services	45,142	44,921	(0.4)
Leisure and Hospitality	22,372	22,731	1.6
Other Services	14,189	14,109	(0.6)
Government	39,893	39,545	(0.9)
Total	260,937	262,127	0.4
<i>Source: Bureau of Economic Analysis 2011, 2012.</i>			
<i>() Indicates a Decrease</i>			

4.2.6.1.2 Housing

According to the U.S. Census, 65 percent of the housing units in the Spokane MSA are owner-occupied, which is similar to the state and slightly less than the nation's rate. Median household income in the MSA is nearly 20 percent higher than the nation, but the housing costs differ by approximately 4 percent. Vacancy rates in both the ROI and the State (approximately 7% and 9%) are much lower than the rate in the nation (approximately 12%). Housing information for the region is shown in Table 4-7.

Jurisdiction	Total Housing Units 2011	Percent Vacant 2011	Percent Owner Occupied 2011	Median Value Owner Occupied 2011	Median Gross Rent 2011	Median Household Income 2011
Spokane, WA MSA	199,952	7.0	64.7	\$192,800	\$733	\$63,625
Washington	2,602,568	9.1	64.4	\$283,200	\$923	\$76,504
United States	131,034,946	12.4	66.1	\$186,200	\$821	\$52,762

Source: U.S. Bureau of the Census, American Community Survey 5-year Estimates 2006-2010.

At the time of this writing, there were approximately 2,000 single family homes listed for sale in the City of Spokane (National Association of Realtors 2013). Approximately 72 percent of the houses listed were at \$250,000 or lower.

4.2.6.1.3 Public Services

Education

The Spokane, Washington MSA ROI has approximately 99 elementary schools, 34 middle schools, and 40 high schools with a total student enrollment of 73,465 students in grades pre-k through 12. The ROI has 66 PK-8 schools and 16 private high schools that enroll approximately 9,377 students (Private School Review 2013). The nearest private school to the Mann USARC is St. Patrick Catholic School with 140 students grade K-9. The nearest public schools are Regal Elementary School, which has 490 students in K-6, and Spokane Area Professional Technical Skills Center, a vocational school for students in grades 9-12 (Public School Review 2013). Both public schools are approximately 0.2 miles away from the USARC property.

Health

Local residents are served by four full service hospitals: Deaconess Medical Center, Holy Family Hospital, Sacred Heart Medical Center, and Valley Hospital and Medical Center. Residents also have access to St. Luke’s Rehabilitation Institute, a cardiac rehabilitation hospital, along with Shriner’s Hospital for Children and the Spokane Veteran’s Affairs Medical Center (AHD 2013a). The hospital nearest the USARC is Holy Family Hospital approximately 2 miles to the northwest of the property. It is a 170-bed hospital that offers a variety of specialty services that include cardiovascular, emergency, neuroscience, oncology, orthopedic, radiology/nuclear medicine/imaging, rehabilitation, surgery, and wound care (AHD 2013b).

Law Enforcement

Law enforcement within the city of Spokane is provided by the city of Spokane Police Department (SPD) and the Spokane County Sheriff's Department. Spokane has its own police department that is comprised of approximately 284 commissioned officers, 99 full-time civilians, 6 temporary or project employees, and 105 volunteers. Equipment available includes 221 vehicles for commissioned officers, 20 motorcycles, and 15 vehicles for non-commissioned employees. The department also has 20 new vehicles and 8 motorcycles in reserve status (City of Spokane 2012a). The department has 12 patrol teams that include a K-9, special weapons and tactics, tactical, and a crisis negotiation team. There are also other investigative units that include a special victims unit, major crimes unit, and a property crimes unit. Both the police department and county sheriff's department occupy the same building in Spokane. The main office is located approximately 5 miles to the southwest of the USARC property. Spokane also has a Spokane Community Oriented Policing (C.O.P.S.) group. C.O.P.S. assists the SPD by working with neighborhoods and community service providers.

Fire Protection

Fire suppression, prevention, and Emergency Medical Services (EMS) support within the City of Spokane is provided by the city of Spokane Fire Department (SFD). There are 14 fire stations staffed full time. Equipment includes 11 pumpers, 2 pumper/ladders, 3 ladders, and 1 heavy rescue unit. The department also has a variety of specialty vehicles that includes a hazardous material unit, a technical rescue unit, two water rescue units, eight brush units, and a command/rehab vehicle, and there are 5 pumpers and 1 ladder that are maintained as a reserve apparatus fleet (City of Spokane 2012a).

All firefighters are trained to provide basic life support. If advanced life support is needed, fire department paramedics respond with one of seven EMS paramedic vehicles that include five engines and two pump/ladder trucks. A private ambulance under contract with the city provides transport services (City of Spokane 2012a).

There are five fire stations outside of the Spokane city limits that are maintained by surrounding fire departments in the county. All of these agencies have mutual agreements with each other and the city of Spokane to assist each other in major emergencies. The nearest fire station is Station 13, located at 1118 West Wellesley Avenue, approximately ½ mile to the west of the USARC (City of Spokane 2013).

Recreation

The Spokane Parks and Recreation Department manages the local parks, major parks, and open space within the city system. Policy direction is provided by the Spokane Park Board. The city park system is comprised of more than 4,100 acres of green space. The system has 87 parks, conservation areas that are mainly located along the Spokane River or Latah Creek, three official trails, an arboretum, an art center, ten community/senior centers, four golf courses, three sports complexes, and seven swimming pools (City of Spokane 2012a). The park nearest to the USARC is Wildhorse Park, located at 3717 N. Ralph Street, less than ½ mile to the southeast.

4.2.6.1.4 Environmental Justice

On February 11, 1994, President Clinton issued *Executive Order (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 minority or low-income 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, is defined as the aggregate annual mean income, which for a family of four was \$22,891 in 2010.

Spokane’s metropolitan area became more economically segregated between 1970 and 1990. Increasingly, higher income households are moving outside of the urban core and the core is becoming predominately a place of poverty (City of Spokane 2012a). Tables 4-8 and 4-9 summarize minority and low-income populations for the area. According to the U.S. Census, the City of Spokane has a much higher rate of those in poverty than the county.

Jurisdiction	Total Population	Median Household Income	All People Whose Income is Below Poverty Level (%)
Spokane	208,040	\$41,466	18.6
Spokane, WA MSA	466,497	\$49,257	14.4
Washington	6,652,845	\$58,890	12.5
United States	306,603,772	\$52,762	14.3

Source: U.S. Department of Commerce, U.S. Census Bureau – American Community Survey 5-year Estimates, 2006-2010.

Table 4-9 Minority Populations: Mann USARC Region and Larger Regions, 2011.

Jurisdiction	Percent Minority	Percent Black or African American	Percent American Indian/Alaska Native	Percent Asian	Percent Native Hawaiian or Other Pacific Islander	Percent Some Other Race	Two or More Races	Percent Ethnicity Hispanic/Latino
Spokane	12.8	2.4	1.6	2.7	0.6	1.2	4.2	5.3
Spokane, WA MSA	10.4	1.7	1.3	2.3	0.4	1.0	3.7	4.4
Washington	21.0	3.5	1.4	7.1	0.6	4.0	4.4	10.9
United States	25.9	12.5	0.8	4.7	0.2	5.1	2.5	16.1

Source: U.S. Department of Commerce, U.S. Census Bureau – American Community Survey 5-year Estimates, 2007-2011.

4.2.6.1.5 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 a 1-mile radius of the Mann USARC, there are four elementary schools, seven daycare centers, one middle school, and two parks.

4.2.6.2 Consequences

Potential socioeconomic impacts are considered significant if the proposed action would cause:

- Substantial gains or losses in population and/or employment; or
- Disequilibrium in the housing market, such as severe housing shortages or surpluses, resulting in substantial property value changes.

Potential environmental justice impacts are considered significant if the proposed action would cause disproportionate effects on low-income and/or minority populations. Potential impacts of environmental health and safety risks to protection of children are considered significant if the proposed action would cause disproportionate effects on children.

After performing an analysis of socioeconomics, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.6.2.1 Alternative 1 – No Action Alternative

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

4.2.6.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. The Mann USARC has closed and its operations have relocated to a new AFRC on Fairchild Air Force Base. Both of the installations are located within the same ROI; therefore, direct impacts on the ROI and regional economy would not differ from baseline conditions.

Moderate adverse impacts to the safety of children could be expected during the caretaker status phase of the property. Although the caretaker would conduct periodic security patrols to insure public safety and security of the remaining government property, the building was vandalized in 2012 and there is the potential for additional vandalism and/or trespassing to occur at the Mann USARC. Since the recent vandalism, the buildings have been used by trespassers for illegal activities, and this may pose a danger to children in the vicinity of the USARC. However, 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.

Indirect Impacts. There would be minor to moderate indirect adverse impacts to economic development under this alternative. There would be benefits foregone (minor short-term adverse indirect impact) from the delayed reuse of the property. The city would lose potential immediate economic benefits from possible employment and sales from the reuse of the property. Potential private developers of the property would lose the immediate redevelopment opportunity. Residents of the surrounding community would lose any potential immediate employment opportunities that may be created through the renovation phase of the property.

In addition, the vacant Mann USARC property is in poor condition due to the recent vandalism of the property. Therefore, long-term caretaker status could result in a decrease in economic development of the surrounding neighborhood because the facility is in disrepair and creates an eyesore for the community.

4.2.6.2.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Direct Impacts. Under Alternative 3, minor short-term beneficial direct economic impacts would be realized by the regional and local economy during the renovation phase of the proposed reuse. Employment generated by renovation 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 U.S. Army Corps of Engineers (USACE) Construction Engineering Research Laboratory, was used to assess the impacts of this alternative on the economy of the ROI. To complete the EIFS model, sample

reuse intensity scenarios and costs were estimated for the alternative. The cost used in this analysis is only an estimate of a possible development scenario and is subject to change depending on the final design. Rough estimates for demolition and construction of a community facility building with a maximum FAR of 0.8 ranged from \$27-34 million (RSMMeans 2013). The estimated construction period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 2.4.

Table 4-10 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. Table 4-10 also provides the indirect impacts on business volume, income, and employment because of the initial direct impacts of the construction activities. Appendix C contains a description of the EIFS model and the EIFS reports on impacts.

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. These impacts would be realized over the length of the construction period. The increase in business volume, income, and employment includes capital expenditures, income, and labor directly associated with the construction activity. Appendix C contains a description of the RTV. Table 4-10 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 historic maximum annual 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 (8.8%) income (7.9%); employment (3.5%); and population (3.2%). Thus, the RTV for each of the variables was found to be considerably less than the respective regional RTV.

Table 4-10 Estimated Annual Economic Impacts from Alternative 3 – Community Facility				
Variable	Direct Impacts	Indirect Impacts	Total	Rational Threshold Value¹
Annual Construction Impacts²				
Sales (Business) Volume	\$23,604,690	\$75,298,940	\$98,903,630	0.52
Income	\$12,868,670	\$13,233,320	\$26,101,980	0.29
Employment	321	321	642	0.27
¹ Rational Threshold Value.				
² 2013 Dollars.				
Source: Economic Impact Forecast System, U.S. Army Corps of Engineers, Construction Engineering Research Laboratory.				

There would be minor short- and long-term beneficial impacts to the economy during the construction or renovation and reuse of the property as a result of creating new jobs in the local area. There would be temporary jobs for construction workers during the demolition and construction period of the project. Operation of a community facility would also create job opportunities for local workers, mainly in the services sector.

There would not be any impacts to local spending, housing, or community services from the additional short- and long-term workers. It is anticipated that no workers would relocate. Local workers would be utilized for both the temporary construction and permanent services workers from within the region.

There would also be additional negligible short- and long-term economic impacts to the local jurisdictions and the state from the revenues generated from the renovation and reuse of the building. States often impose sales taxes on materials sold to builders (NAHB 2009). The state would benefit from the additional tax revenue generated during the renovation phase. The county may benefit from the property taxes collected from the reuse.

There are no anticipated potential impacts to public services (i.e. police and fire protection, hospital services) and negligible benefits to education services from the reuse as a community education center. The site is already served by fire and law enforcement and there would be no population changes, so the reuse would not require the extension or addition of services. The reuse as a community facility would provide additional opportunities for educational, vocational, or recreational services to the surrounding population.

There would be negligible short-term adverse impacts to the local population, which includes minority and low income individuals, during the construction and reuse of the site. It is not anticipated that impacts would be any greater or more severe on minorities or individuals below the poverty line than on non-minorities and on those above the poverty line. Any impacts to the local population would be temporary. During the reuse, the property would provide long-term minor beneficial impacts to the local population, including minority and low income populations. The reuse as an adult education/community center would provide additional opportunities for educational, vocational, or recreational services to the surrounding population.

There are no anticipated impacts to the safety of children during the construction phase of the project. 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. Safety measures, barriers, and “no trespassing” signs would be placed around the perimeter of construction sites to deter children from playing in these areas, and construction vehicles and equipment would be secured when not in use. There are no anticipated impacts to the safety of children during the reuse of the project.

Indirect Impacts. 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 4-10. The indirect economic impacts of the proposed construction activities on business volume, income, and employment are also provided in Table 4-10. As a result of construction expenditures for materials, supplies, and services, in addition to construction labor wages, the EIFS model estimates an approximate \$75 million increase in indirect business volume; a \$13 million increase in indirect or induced personal income; and an increase of 321 indirect jobs created in the construction, retail trade, service, and industrial sectors. These impacts would be realized during the length of the

construction period, and would have non-significant short-term impacts on the regional economy.

4.2.6.2.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Direct Impacts. Under Alternative 4, moderate short-term beneficial direct economic impacts would be realized by the regional and local economy during the renovation 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 cost used in this analysis is only an estimate of a possible development scenario and is subject to change depending on the final design. Using RS Means, costs were estimated to construct a variety of commercial properties with FAR bonuses allowing for some residential development. The costs can vary widely depending on the type and quality of materials and the amount of detail in the final project. Rough estimates for a new commercial development with an increased FAR that includes public amenities and residential properties could cost up to \$54 million (RSMMeans 2013, NAHB 2010). The estimated construction/renovation period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 2.4.

Table 4-11 provides the estimated direct, indirect, and total annual economic impacts of construction/renovation activities on business volume, income, and employment, as estimated by the EIFS model. Table 4-11 also provides the RTV associated with each of the economic impacts resulting from the renovation activity. The RTV for each of the variables was found to be considerably less than the respective regional RTV, so the regional economic impacts are considered non-significant.

Table 4-11 Estimated Annual Economic Impacts from Alternative 4 – Residential				
Variable	Direct Impacts	Indirect Impacts	Total	Rational Threshold Value¹
Annual Construction Impacts²				
Sales (Business) Volume	\$37,811,160	\$120,617,600	\$158,428,800	0.83
Income	\$20,597,540	\$21,197,790	\$41,795,330	0.46
Employment	513	514	1,028	0.43
¹ Rational Threshold Value.				
² 2013 Dollars.				
Source: Economic Impact Forecast System, U.S. Army Corps of Engineers, Construction Engineering Research Laboratory.				

There would be moderate short- and long-term beneficial impacts to the economy during the construction of a commercial development on the property as a result of creating new jobs in the local area. Most of the jobs would be for temporary workers that are part of the construction activity. During and following construction, permanent jobs would be created. For example, if a restaurant was built on the site, there would be additional staff hired to manage, cook, and serve at the restaurant. The number of jobs created would depend on the types and quantity of businesses on site.

There would not be any impacts to local spending, housing, or community services from the additional short- and long-term workers. It is anticipated that no workers would relocate. Local workers from within the ROI would be utilized for both the temporary and permanent jobs.

There would be additional moderate short- and long-term economic impacts to the local jurisdictions and the state from the revenues generated from renovation or construction of a commercial development. The state would receive additional tax revenue from the taxes on materials sold to builders. In the long-term, if the development sells goods or services that local and state taxes are collected on, the city and the state would receive tax revenue from the sale. The county would benefit from the impact, permit, and other fees paid by the builders and developers. There would also be long-term benefits to the county from annual property tax payments that businesses would pay.

There is the potential for negligible impacts to public services (i.e. police, fire, hospital, and education services) and no impacts to recreation or the safety of children. The construction of a commercial development is not expected to create an influx of people from outside or within the region. However, there may be additional people working and commuting to the site. The reuse may change the number of police and fire response calls and times of calls to that location. The city has adequate staff and resources to accommodate any anticipated changes.

There would be minor short-term and long-term impacts to the local population, which includes minority and low income individuals, during the construction and reuse of the site. During the construction, there may be increased noise, fugitive dust, and traffic congestion around the property. Construction standards would be in place to minimize impacts. During the reuse, a new commercial development potentially would bring in jobs and additional revenue into a community that is struggling with relatively high unemployment and a poverty rate higher than the national average. It is not anticipated that impacts would be any greater or more severe on minorities or individuals below the poverty line than non-minorities and those above the poverty line. Any impacts to the local population would be temporary.

Indirect Impacts. 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 4-11. The indirect economic impacts of the proposed construction activities on business volume, income, and employment are also provided in Table 4-11. As a result of construction expenditures for materials, supplies, and services, in addition to construction labor wages, the EIFS model estimates an approximate \$120 million increase in indirect business volume; a \$21 million increase in indirect or induced personal income; and an increase of 514 indirect jobs created in the construction, retail trade, service, and industrial sectors. These impacts would be realized during the length of the construction period, and would have non-significant short-term impacts on the regional economy.

4.2.6.2.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Under this Alternative it is anticipated that the existing USARC would be demolished and light commercial or industrial buildings would be constructed or the existing buildings would be renovated and reused. For purposes of this analysis, the estimated cost of materials and supplies under Alternative 5 would range from \$18-36 million (2013 dollars). The estimated construction period for the new or renovated facilities is 1 year. The EIFS employment and income multiplier for the ROI is 2.4. The RTV for each of the variables was found to be considerably less than the respective regional RTV, so the regional economic impacts are considered non-significant. Table 4-12 provides the estimated direct, indirect, and total annual economic impacts of renovation activities on business volume, income, employment, and RTV values, as estimated by the EIFS model.

Table 4-12 Estimated Annual Economic Impacts from Alternative 5 – Limited Industrial/Manufacturing				
Variable	Direct Impacts	Indirect Impacts	Total	Rational Threshold Value¹
Annual Construction Impacts²				
Sales (Business) Volume	\$25,680,230	\$81,919,940	\$107,600,200	0.56
Income	\$13,986,550	\$14,396,920	\$28,383,460	0.31
Employment	349	349	698	0.29
¹ <i>Rational Threshold Value.</i>				
² <i>2013 Dollars.</i>				
<i>Source: Economic Impact Forecast System, U.S. Army Corps of Engineers, Construction Engineering Research Laboratory.</i>				

Short- and long-term impacts to the economy and tax revenues would be the same as those described under the commercial reuse scenario, but the impacts would be minor because the cost and amount of construction is less.

There would not be any impacts to housing or community services from the additional short- and long-term workers. It is anticipated that no workers would relocate. Local workers from within the ROI would be utilized for both the temporary and permanent jobs.

Impacts to public services, the safety of children, populations, and housing would be the same as those described under the commercial construction/renovation scenario.

Indirect Impacts. 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 4-12. The indirect economic impacts of the proposed construction activities on business volume, income, and employment are

also provided in Table 4-12. As a result of construction expenditures for materials, supplies, and services, in addition to construction labor wages, the EIFS model estimates an approximate \$81 million increase in indirect business volume; a \$14 million increase in indirect or induced personal income; and an increase of 349 indirect jobs created in the construction, retail trade, service, and industrial sectors. These impacts would be realized during the length of the construction period, and would have non-significant short-term impacts on the regional economy.

4.2.7 Transportation

4.2.7.1 Affected Environment

This section describes the existing transportation conditions at and surrounding the Mann USARC.

4.2.7.1.1 Roadways and Traffic

The Mann USARC is located between North Market Street and North Haven Street, approximately 2 blocks south of the intersection of East Wellesley Avenue and North Market Street. The main roadway accessing the Mann USARC is North Market Street. It is a one-way three lane major principal arterial that runs north. North Haven Street is a one-way two lane principal arterial that runs south.

North Market Street becomes North Greene Street, and then North Freya Way, before intersecting with Interstate 90 approximately 3.2 miles south of the USARC. In Washington, Interstate 90 connects Seattle, Bellevue, Ellensburg, Moses Lake and Spokane (WSDOT 2013). Approximately 4 miles north of the USARC, North Market Street intersects with Highway 395 (North Spokane Corridor).

Average weekday traffic volume adjacent to the USARC property in 2009-2010 was 15,200 vehicles going north on North Market Street and 14,200 vehicles going south on North Haven Street, for a combined traffic volume of 29,400. Average weekday traffic volume on Wellesley Avenue north of the USARC was 9,400 vehicles (City of Spokane 2011).

Before closure of the Mann USARC, daily vehicle traffic to the facility included approximately 10 full-time employees who commuted to the facility daily and approximately 90 persons who attended drills on one weekend per month. According to the Institute of Transportation Engineers, a single tenant office building generates approximately four trip ends per employee (Table 4-13), the total number of trips entering and exiting a site during that designated time (ITE 2008). Before closure of the USARC, it generated approximately 40 trip ends per day from full-time employees and an additional 360 trip ends one weekend per month by reservists.

4.2.7.1.2 Public Transportation

Spokane Transit Authority (STA) provides bus service seven days a week for the Spokane area with 33 fixed bus routes. Service levels are reduced on weekends and holidays. The STA has an approximately 371 square mile service area in and around Spokane that extends east to Liberty Lake, west to Medical Lake and Fairchild Air Force Base, and southwest to Cheney (Greater Spokane Incorporated 2013b). Route 33 Wellesley serves the USARC with stops adjacent to the property at the intersection of North Haven Street and East Heroy Avenue and the intersection of

North Market Street and East Heroy Avenue. Route 27 Hillyard serves the USARC with a stop north of the property at the corner of East Wellesley Avenue and North Haven Street (STA 2013). Greyhound Bus and Amtrak Train service both operate out of a station in downtown Spokane on 221 West 1st Avenue approximately 6 miles to the southwest of the USARC. Spokane International Airport is almost 13 miles southwest of the property and accommodates seven passenger and two air cargo carriers (SIA 2013). The airport offers both international and domestic flights and serves the Spokane, Washington and Coeur D'Alene, Idaho region.

4.2.7.2 Consequences

Potential impacts to transportation resources are considered significant if the proposed action would:

- Disrupt or improve current transportation patterns and systems;
- Deteriorate or improve existing levels of service; or
- Change existing levels of safety.

After performing an analysis of transportation resources, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.7.2.1 Alternative 1 – No Action Alternative

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

4.2.7.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Maintenance activities are expected to continue for the grounds and remaining asphalt areas. Negligible beneficial impacts to the community would result from the reduction in employees commuting to the USARC.

Indirect Impacts. No indirect impacts to transportation resources are anticipated because maintenance activities on the property are expected to continue. There would be no changes to transportation resources under this alternative.

4.2.7.2.3 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Direct Impacts. During the construction or renovation phase, there would be minor direct adverse impacts to transportation under this alternative. A short-term increase in vehicular traffic on the local roads around the site would occur during this phase of the project. There would be commuting construction workers and more trucks and heavy equipment traffic delivering and hauling supplies.

The USARC property can be entered from either North Market Street or North Haven Place. It is possible that the new development may use the same access points; however, it is also possible that the property could be accessed from other points on these same streets or along East Heroy Avenue (Figure 1-2).

Reuse of the Mann USARC would result in minor to moderate adverse impacts to transportation patterns depending on the final design and type of community facility development. Potential community facility reuses could include, but are not limited to, public services, centers for vocational training, community education, or local community outreach. If development projects incorporate specified and described public amenities (Spokane Municipal Code 2005), the maximum floor area allowed under zoning for a community facility development would be 243,936 square feet. However, community facilities in the Spokane region typically range from 20,000 to 100,000 square feet.

In the long-term, the reuse as a community facility would increase traffic and public transportation use in the area. Impacts would be minor to moderate depending on the type and final square footage of the development. A community facility, at the highest floor area allowed under zoning (243,936 square feet of floor area), would generate between approximately 2,187 and 6,561 trip ends per day (ITE 2008) if the existing buildings were demolished and the maximum allowed building area was constructed. However, a community facility this large is unlikely. If the existing USARC buildings are renovated and reused, there would be 37,526 square feet of floor area, resulting in approximately 342 to 1026 trip ends per day. For comparison, there were approximately 40 trip ends daily and an additional 360 trip ends one weekend per month for training events before closure of the USARC. Table 4-14 compares trip ends generated under Alternative 3 compared with those of the No Action Alternative. The roads adjacent and near the USARC would be able to accommodate the increase in traffic because they are urban principal arterial routes, and the City of Spokane would require a traffic impact study before a construction project would be approved (City of Spokane Municipal Code 2013b). Traffic calming measures may be required because North Haven and North Market Streets are limited access one-way roads that were meant to move traffic through an area rather than to provide access to adjacent property (Spokane County 2012). In addition, users of a community facility would likely travel by public transportation, and Spokane has several bus stops near the proposed project site.

Indirect Impacts. No indirect impacts to transportation are anticipated because of the small scale of this project in relation to the highly developed transportation infrastructure in the region.

Table 4-13 Summary of Trip Generation Rates by Land Use Type	
Land Use	Average (TE/KSF)¹
Recreational Community Center	23
Community College	27
Church/Synagogue	9/11
Automobile Care Center	16
New Car Sales	33
Automobile Parts Sales	62

Table 4-13 Summary of Trip Generation Rates by Land Use Type	
Land Use	Average (TE/KSF)¹
Gasoline/Service Station	169
Bank (Walk-in)	156
Bank (Drive-in)	148
General Office	11
Single-tenant Office Building	4 (TE/number of employees)
Government Office Complex	28
Hotel	8 (TE/number of rooms)
Movie Theater	78
Health Club	33
Clinic	31
Medical Dental Office	36
Restaurant – Sit Down	127
Restaurant – Fast Food	496
Shopping Center	43
Discount Supermarket	97
Drug Store w/ Drive-Thru	88
General Light Industrial	7
Manufacturing	4
Warehousing	4
¹ Trip-End (the origin or destination of a trip)/units of 1,000 square feet NA – Not Available <i>Source: 8th Edition Institute of Transportation Engineers Trip Generation Report 2008</i>	

	Estimated Daily Trip Ends¹		North Market Street/North Haven Street Combined Average Weekday Traffic Volume
No Action Alternative	40 (plus 360 one weekend per month)		29,400 vehicles
Caretaker Status Alternative	0		
	Estimated Daily Trip Ends¹ (Renovation of Existing Buildings)	Estimated Daily Trip Ends¹ (Demolition and Construction of Maximum FAR²)	
Alternative 3 – Community Facility	342 to 1,026	2,187 to 6,561	
Alternative 4 – Commercial	148 to 1,634	2,804 to 30,143	
Alternative 5 – Light Industrial/Manufacturing	152 to 266	972 to 1,701	
¹ Trip ends: the total number of trips entering and exiting a site. ² FAR: Floor Area Ratio Source: Institute of Transportation Engineers. 2008. Trip Generation Rates from the 8 th Edition ITE Trip Generation Report Series.			

4.2.7.2.4 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Direct Impacts. Short-term and property access impacts would be similar to those described under Alternative 3. During the construction or renovation phase, there would be minor direct adverse impacts to transportation under this alternative. A short-term increase in vehicular traffic on the local roads around the site would occur during this phase of the project. There would be commuting construction workers and more trucks and heavy equipment traffic delivering and hauling supplies.

Reuse of the Mann USARC would result in minor to moderate adverse impacts to transportation patterns depending on the final design and type of commercial development. Potential commercial reuses could include, but are not limited to, commercial, financial, retail, personal services, hotels, restaurants, wineries and microbreweries, entertainment, museum, and cultural,

professional and medical offices, motor vehicle sales, rental, repair, or washing, gasoline sales, automotive parts and tires, and self-storage or warehouse. If development projects incorporate specified and described public amenities (Spokane Municipal Code 2005), the maximum floor area allowed under zoning would be 701,316 square feet for commercial developments.

In the long-term, commercial reuse would increase traffic and public transportation use in the area. Impacts would be minor to moderate depending on the type and final square footage of the development. A commercial development, at the highest floor area allowed under zoning (701,316 square feet), would generate between approximately 2,804 to 30,143 trip ends per day (ITE 2008) if the existing buildings were demolished and the maximum allowed building area was constructed, using warehousing and a shopping center as examples of typical commercial uses. However, a new commercial development this size is unlikely. If the existing USARC buildings are renovated and reused, there would be 37,526 square feet of floor area, resulting in approximately 148 to 1,634 trip ends per day. For comparison, there were approximately 40 trip ends daily and an additional 360 trip ends one weekend per month for training events before closure of the USARC. Table 4-14 compares trip ends generated under Alternative 4 compared with those of the No Action Alternative. The roads adjacent and near the USARC would be able to accommodate the increase in traffic because they are urban principal arterial routes, and the City of Spokane would require a traffic impact study before a construction project would be approved (City of Spokane Municipal Code 2013b). Traffic calming measures may be required because North Haven and North Market Streets are limited access one-way roads that were meant to move traffic through an area rather than to provide access to adjacent property (Spokane County 2012). In addition, users of a commercial development would likely travel by public transportation, and Spokane has several bus stops near the proposed project site.

Indirect Impacts. No indirect impacts to transportation are anticipated because of the small scale of this project in relation to the highly developed transportation infrastructure in the region.

4.2.7.2.5 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Direct Impacts. During the construction or renovation phase, there would be minor direct adverse impacts to transportation under this alternative. A short-term increase in vehicular traffic on the local roads around the site would occur during this phase of the project. There would be commuting construction workers and more trucks and heavy equipment traffic delivering and hauling supplies.

Reuse of the Mann USARC would result in minor to moderate adverse impacts to transportation patterns depending on the final design and type of light industrial/manufacturing development. If development projects incorporate specified and described public amenities (Spokane Municipal Code 2005), the maximum floor area allowed under zoning would be 243,936 square feet for light industrial/manufacturing developments.

In the long-term, industrial reuse may increase traffic and public transportation use in the area. Impacts would be minor to moderate depending on the type and final square footage of the development. An industrial or manufacturing development, at the highest floor area allowed under zoning (243,936 square feet), would generate between approximately 972 to 1,701 trip ends per day (ITE 2008) if the existing buildings were demolished and the maximum allowed building area was constructed. If the existing USARC buildings are renovated and reused, there

would be 37,526 square feet of floor area, resulting in approximately 972 to 1,701 trip ends per day. For comparison, there were approximately 40 trip ends daily and an additional 360 trip ends one weekend per month for training events before closure of the USARC. Table 4-14 compares trip ends generated under Alternative 5 compared with those of the No Action Alternative. The roads adjacent and near the USARC would be able to accommodate the increase in traffic because they are urban principal arterial routes, and the City of Spokane would require a traffic impact study before a construction project would be approved (City of Spokane Municipal Code 2013b). Traffic calming measures may be required because North Haven and North Market Streets are limited access one-way roads that were meant to move traffic through an area rather than to provide access to adjacent property (Spokane County 2012). In addition, employees of an industrial or manufacturing facility would likely travel by public transportation, and Spokane has several bus stops near the proposed project site.

Indirect Impacts. No indirect impacts to transportation are anticipated because of the small scale of this project in relation to the highly developed transportation infrastructure in the region.

4.3 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 Mann 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 categories.

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 Mann USARC. This includes the installation and the area proximate to the installation boundary and varies by resource category being considered. Analysis areas are defined in Section 4.3.2 for each resource category analyzed in detail.

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 September 2011 (The original environmental baseline for the EA). These include past and present actions at the property 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.

Historical information suggests that the Mann USARC property was undeveloped until the U.S. government bought the property in 1947 and built the USARC buildings in 1953 (USACE 2007). The USARC is located at the southern end of the Hillyard Neighborhood business district. The Hillyard Neighborhood existed as a separate town from Spokane between 1892 and 1924. The land use surrounding the Mann USARC is primarily mixed commercial and residential, and many of the residential areas in the neighborhood were developed in the early 1900s to house Great Northern Railroad workers working in the local rail yard. In 1924, Hillyard was officially annexed by neighboring Spokane. The Hillyard Historic Business District, just north of the

USARC property, is a contiguous façade of commercial block buildings erected between 1901 and 1948.

A new AFRC was constructed in 2009 on the Fairchild Air Force Base in Spokane County approximately 14 miles southwest of the Mann USARC. A separate EA was prepared by the Department of the Air Force, Fairchild Air Force Base that identified, evaluated, and documented the environmental effects of the construction of and operation of the new AFRC.

The Mann USARC falls under the City of Spokane's Northeast Development Target Area, which is one of seven target area development projects within Spokane for which the City assists in developing infrastructure projects and incentive programs that grow industries and bring career opportunities to the community (NEPDA 2012). The Northeast Development Target Area is part of the City of Spokane's Comprehensive Plan and the Greater Hillyard Neighborhood Plan for industrial and manufacturing development/redevelopment and job creation.

As part of the development of the Northeast Development Target Area, the City committed approximately \$5 million in 2009 for streetscape improvements to Market Street, which borders the USARC property to the east.

In 2010, Inland Empire Residential Resources, a local non-profit, opened the Market Street Station, a historic bank building transformed into a 33-unit affordable rental complex for the elderly approximately 0.4 mile north of the USARC. A month later, the Spokane Housing Authority broke ground on a 51-unit rental complex, with 26 units set aside for veterans, on North Regal Street in the Hillyard Neighborhood 0.5 mile north of the USARC property. This redevelopment was funded through a \$2.5 million loan from the Washington Housing Trust Fund and a HUD lead abatement grant (HUD 2013).

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.

Reasonably foreseeable future actions that have been identified and considered in the analysis of cumulative impacts, both on the USARC property and off the USARC property, are:

- Continued redevelopment and revitalization of homes, businesses, and government buildings in and around the Hillyard Business District.
- Improvements to Market Street that were completed in 2009 garnered another \$17 million from public and private funds to revitalize streets, sidewalks, trees, lighting, and water and sewer connections on and along Market Street (HUD 2013).
- Northeast Washington Housing Solutions has announced plans to upgrade two apartment complexes in Hillyard (HUD 2013).
- Future development within the City of Spokane Northeast Development Target Area includes the construction of the US 395 NSC, which will run approximately 0.35 mile from the USARC property. This new corridor will provide a link between US 2/US 395 to Interstate 90, which will provide a north-south trade route through Spokane instead of the use of local arterial streets (WSDOT 2009). Additionally, the completion of the US 395 NSC will contribute to the completion of a NAFTA highway that allows for expanded freight transport among Canada, the United States, and Mexico. Over the next 10 years, this new corridor is expected to attract major industrial and manufacturing development to the region (City of Spokane 2010). The Northeast Public Development Authority was created to help facilitate this development by

helping to create public-private partnerships and assisting with financing for economic development activities (NEPDA 2012).

4.3.1 Potential Cumulative Impacts

4.3.1.1 No Impacts to Resources

As documented in Section 4.0 of this EA, there are several resource categories that were eliminated from discussion in the cumulative impacts section. The resource categories that are not discussed in detail include:

- Biological Resources;
- Cultural Resources;
- Geology and Soil;
- Hazardous and Toxic Substances;
- Utilities;
- Water Resources.

4.3.1.2 Alternative 1 – No Action Alternative

Under Alternative 1 it is anticipated that past and present development trends on the Mann USARC and in the surrounding civilian community would continue. However, for the closure action directed by the BRAC Commission, it is noted that for the No Action Alternative, maintenance of current conditions is not feasible because the BRAC actions are federal law.

4.3.1.3 Alternative 2 – Caretaker Status Alternative

Cumulative impacts under Alternative 2 by resource category are as follows:

- **Aesthetic and Visual Resources.** The cumulative impact analysis area for aesthetic and visual resources includes the viewshed around the property. The impacts of the Caretaker Status Alternative when combined with impacts of the past, current, and reasonably foreseeable projects would not cause significant cumulative impacts to the environment. The aesthetics of the area are expected to remain consistent with current conditions.
- **Air Quality.** The cumulative impact analysis area for air quality includes Spokane County, Washington. During implementation of caretaker status, there would be a net decrease in emissions because operations at the property, including heating and cooling, would be reduced. In addition, there would be a reduction of mobile emissions from government vehicles and POVs because the building would be vacant and there would be no building users. Therefore, there are no anticipated cumulative impacts.
- **Hazardous and Toxic Substances.** The cumulative impact analysis area for hazardous and toxic substances includes a ½ mile radius around the property. Under this alternative, the elimination of a military presence at the site would cause a negligible long-term decrease in hazardous and toxic substances on the property. The impacts of the Caretaker Status Alternative when combined with impacts of the past, current, and reasonably foreseeable activities would not cause significant cumulative impacts to the environment.

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- **Land Use.** The cumulative impact analysis area for land use includes the boundaries of the Hillyard Neighborhood. There are no anticipated cumulative impacts because there would be no changes to land use or zoning under this alternative.
 - **Noise.** The cumulative impact analysis area for noise is the area surrounding the property where noise from the reuse can be heard under normal circumstances. It is likely caretaker activities would result in noise levels below baseline levels. Lower noise levels would occur throughout the period of caretaker status. Any maintenance activities required under caretaker status would be similar to activities currently taking place at the Mann USARC. These activities when combined with impacts of the past, current, and reasonably foreseeable activities would not cause significant cumulative impacts to the noise environment.
 - **Socioeconomics.** The cumulative impact analysis area for socioeconomics includes the Spokane, Washington MSA. Under this alternative, the Mann USARC would close and relocate its operations to a new AFRC at the Fairchild Air Force Base. The new facility is located within Spokane County; therefore, the impacts on the ROI and regional economy would not differ from baseline conditions. There are no anticipated cumulative impacts.
 - **Transportation.** The cumulative impact analysis area for transportation includes a 3-mile radius around the property, which is the approximate distance to Interstate 90, a major transportation route in Spokane. Under this alternative, the elimination of a military presence at the site would cause a long-term decrease in traffic on and around the property. The impacts of the Caretaker Status Alternative when combined with impacts of the past, current, and reasonably foreseeable activities would not cause significant cumulative impacts to the environment.

4.3.1.4 Alternative 3 – Traditional Army Disposal and Reuse of the Mann USARC – for Community Facility Use

Cumulative impacts under Alternative 3 by resource category are as follows:

- **Aesthetic and Visual Resources.** A community facility development with new or renovated buildings and landscaping would result in a long-term beneficial impact to the visual character of the landscape associated with this project in combination with other past, present, and reasonably foreseeable future activities such as redevelopment efforts in the Hillyard Business District. The cumulative impact would be non-significant.
- **Air Quality.** Potential emissions from the proposed demolition of the Mann USARC and construction of a new community facility or renovation and reuse of the Mann USARC would be non-significant. The contribution of these non-significant emissions to regional air emissions would not result in a significant cumulative impact because the replacement activity emissions are clearly *de minimis* (Appendix B).
- **Hazardous and Toxic Materials.** Demolition or renovation of the Mann USARC and the proper disposal of any remaining hazardous and toxic substances (e.g., ACM, LBP, and PCBs) would result in non-significant impacts in combination with other past, present, and reasonably foreseeable future activities. There would be negligible short-term adverse cumulative impacts due to the potential for releases and spills that might occur during demolition and construction activities associated with past, present, and

foreseeable future actions, such as redevelopment efforts in the Hillyard Business District, in combination with the proposed action. These spills could be related to POL products such as gasoline, diesel, hydraulic fluid, motor oil, transmission fluid, and antifreeze; or spills could be related to building materials utilized during revitalization and redevelopment.

- **Land Use.** The reuse as a community facility would result in a use similar to baseline levels. These activities when combined with impacts of the past, current, and reasonably foreseeable activities such as redevelopment efforts in the Hillyard Business District would not cause significant cumulative impacts to land use.
- **Noise.** Noise under Alternative 3 would consist of construction noise and privately owned vehicle noise. The surrounding properties have mostly residential and commercial land uses, and there are adjacent principal arterial roads. Therefore, the presence of a community facility may slightly increase noise levels due to increased traffic volume frequenting the property. However, this in combination with noise from other past, present, and reasonably foreseeable future activities, such as redevelopment efforts in the Hillyard Business District and construction of the US 395 NSC, would have non-significant cumulative impacts to the noise environment.
- **Socioeconomics.** Employment generated by the reuse of the Mann USARC would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies. These beneficial impacts combined with the employment and economic opportunities of future development that is expected throughout the region would have non-significant short- and long-term beneficial cumulative impacts to the local and regional community.
- **Transportation.** The reuse of the Mann USARC as a community facility would result in a minor to moderate adverse impact to traffic within the analysis area. There would be more traffic compared to current conditions; however, the roads adjacent and near the USARC would be able to accommodate the increase in traffic. This in combination with traffic from other past, present, and reasonably foreseeable future activities, such as redevelopment efforts in the Hillyard Business District and construction of the US 395 NSC, would have non-significant cumulative impacts to transportation.

4.3.1.5 Alternative 4 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Commercial

Cumulative impacts under Alternative 4 by resource category are as follows:

- **Aesthetic and Visual Resources.** Non-significant cumulative impacts to aesthetic and visual resources under Alternative 4 would be similar to those listed under Alternative 3.
- **Air Quality.** Potential emissions from the proposed demolition of the Mann USARC and construction of a commercial development or renovation and reuse of the Mann USARC would be non-significant. The contribution of these non-significant emissions to regional air emissions would not result in a significant cumulative impact because the replacement activity emissions are clearly *de minimis* (Appendix B).
- **Land Use.** Non-significant impacts associated with this project in combination with other past, present, and reasonably foreseeable future activities, such as redevelopment efforts in the Hillyard Business District, would include potential land use changes for

new commercial facilities and potentially a higher intensity reuse. These land use changes are compatible with surrounding land uses and zoning ordinances in the city.

- **Noise.** Noise under Alternative 4 would consist of construction noise and privately owned vehicle noise. The surrounding properties have mostly residential and commercial land uses, and therefore, the presence of businesses may increase noise levels due to increased traffic volume frequenting the property. Traffic noise would be variable throughout the day with possible increased traffic noise during working and commuting times, in the evenings and on weekends. This, in combination with noise from other past, present, and reasonably foreseeable future activities would have non-significant cumulative impacts to the noise environment.
- **Socioeconomics.** Employment generated by the reuse of the Mann USARC would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies. These beneficial impacts combined with the employment and economic opportunities of future development that is expected throughout the region would have non-significant short- and long-term beneficial cumulative impacts to the local and regional community.
- **Transportation.** In the long-term, reuse as a commercial development would have minor to moderate impacts resulting from an increase in the traffic volume in the area. Traffic would be variable throughout the day, being potentially higher around peak working commuting times in the morning and evening during the weekday, later in the evening, and on weekends. The roads adjacent and near the USARC would accommodate the increase in traffic. This, in combination with traffic from other past, present, and reasonably foreseeable future activities, such as redevelopment efforts in the Hillyard Business District and construction of the US 395 NSC, would have non-significant cumulative impacts to transportation.

4.3.1.6 Alternative 5 – Traditional Army Disposal and Reuse of the Mann USARC – Full Build-Out as Limited Industrial/Manufacturing

Cumulative impacts under Alternative 5 by resource category are as follows:

- **Aesthetic and Visual Resources.** Non-significant cumulative impacts to aesthetic and visual resources under Alternative 5 would be similar to those listed under Alternative 4.
- **Air Quality.** Potential emissions from the proposed demolition of the Mann USARC and construction of a limited industrial/manufacturing development or renovation and reuse of the Mann USARC would be non-significant. The contribution of these non-significant emissions to regional air emissions would not result in a significant cumulative impact because the replacement activity emissions are clearly *de minimis* (Appendix B).
- **Land Use.** Non-significant cumulative impacts to land use under Alternative 5 would be similar to those listed under Alternative 4.
- **Noise.** Noise under Alternative 5 would consist of construction noise and privately owned vehicle noise. The surrounding properties have mostly residential and commercial land uses, and therefore, the presence of industry or manufacturing may increase noise levels due to increased traffic volume frequenting the property. Traffic noise would be variable throughout the day with possible increased traffic noise during

working and commuting times. Noise levels would comply with applicable federal, state, interstate, local, and/or occupational noise control regulations. This, in combination with noise from other past, present, and reasonably foreseeable future activities would have non-significant cumulative impacts to the noise environment.

- **Socioeconomics.** Non-significant cumulative impacts to socioeconomics under Alternative 5 would be similar to those listed under Alternative 4.
- **Transportation.** In the long-term, reuse as a limited industrial/manufacturing development would have minor to moderate impacts resulting from an increase in the traffic volume in the area. Traffic would be variable throughout the day, being potentially higher around peak working commuting times in the morning and evening during the weekday. The roads adjacent and near the USARC would accommodate the increase in traffic. This, in combination with traffic from other past, present, and reasonably foreseeable future activities, such as redevelopment efforts in the Hillyard Business District and construction of the US 395 NSC, would have non-significant cumulative impacts to transportation.

4.4 Best Management Practices

As discussed in Sections 4.1 through 4.3 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 construction, as appropriate to minimize impacts associated with implementing the proposed action.

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SECTION 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 Environmental Analysis of Army Actions (32 CFR 651). As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the disposal and reuse alternatives, the Caretaker Status Alternative, and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a Finding of No Significant Impact is warranted and preparation of an EIS is not required.

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This EA was prepared under the direction of the 88th RSC and U.S. Army Corps of Engineers. Individuals who assisted in issue resolution and provided guidance for this document are:

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- Members of the LRA
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- U.S. Fish and Wildlife Service
- Washington State Department of Ecology
- Washington State Department of Natural Resources
- Department of Housing and Urban Development, Office of Special Needs Assistance Programs
- City of Spokane
- Office of Environmental Policy and Compliance, U.S. Department of Interior
- State of Washington Department of Archaeology & Historic Preservation
- Kalispel Indian Community of Kalispel Reservation
- Spokane Tribe
- Coeur d'Alene Tribe
- Confederated Tribes of Colville Reservation

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SECTION 10.0 ACRONYMS

A		EDNA	Environmental Designation for Noise Abatement
ACM	Asbestos-Containing Material	EIFS	Economic Impact Forecast System
AFRC	Armed Forces Reserve Center	EIS	Environmental Impact Statement
AMSA	Area Maintenance Support Activity	EMS	Emergency Medical Services
AST	Aboveground Storage Tank	EO	Executive Order
B		F	
BIA	Bureau of Indian Affairs	FAR	Floor Area Ratio
BMPs	Best Management Practices	FEMA	Federal Emergency Management Agency
BRAC	Base Closure and Realignment	FNSI	Finding of No Significant Impact
BRAC Commission	Base Closure and Realignment Commission	Ft	feet
C		G	
CAA	Clean Air Act		
CEQ	Council on Environmental Quality	H	
CESQG	Conditionally Exempt Small Quantity Generator	HVAC	Heating, Ventilation, and Air Conditioning
CFR	Code of Federal Regulations	HUD	Housing and Urban Development
C.O.P.S.	Spokane Community Oriented Policing	I	
D		J	
dB	Decibel		
dBA	A-Weighted Noise Levels	K	
DoD	Department of Defense	kg	kilograms
DNL	Day-Night Average Sound Level	L	
E		LBP	Lead-Based Paint
EA	Environmental Assessment	Leq	equivalent sound level
ECP	Environmental Condition of Property	LRA	Local Redevelopment Authority

LUST	Leaking Underground Storage Tank	S	
M			
MEP	Military Equipment Parking	SFD	Spokane Fire Department
µg/sf	Micrograms per Square Foot	SHPO	State Historic Preservation Office
MSA	Metropolitan Statistical Area	SIP	State Implementation Plan
		SPD	Spokane Police Department
N		STA	Spokane Transit Authority
NAAQS	National Ambient Air Quality Standards	T	
NAFTA	North American Free Trade Agreement	TE/KSF	Trip-ends/1,000 SF
NCA	Noise Control Act	U	
NEPA	National Environmental Policy Act	US	United States
NOI	Notice of Interest	USACE	United States Army Corps of Engineers
NRHP	National Register of Historic Places	USARC	United States Army Reserve Center
NSC	North Spokane Corridor	USC	United States Code
NWR	National Wildlife Refuge	USEPA	United States Environmental Protection Agency
O		USFWS	United States Fish and Wildlife Service
OWS	Oil-Water Separator	USGS	United States Geological Survey
P		UST	Underground Storage Tank
PBC	Public Benefit Conveyance	V	
PCB	Polychlorinated biphenyls		
POL	Petroleum, Oils, and Lubricants	W	
POV	Privately Owned Vehicle	WA SHPO	Washington State Historic Preservation Office
Q			
R		X	
RCRA	Resource Conservation and Recovery Act		
ROI	Region of Influence	Y	
RONA	Record of Non-Applicability		
RSC	Regional Support Command	Z	
RTV	Rational Threshold Values		

APPENDIX A – PUBLIC AND AGENCY COORDINATION

A.1 Scoping Coordination	A-3
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Environmental Assessment Public and Agency Scoping

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. Initial scoping letters were sent to federal, state, and local agencies as well as other interested parties to request comments on the proposed scope of the Mann USARC EA. A 30-day comment period was initiated from the date of the letters. Information obtained during the scoping process could be used to develop the scope of the EA. All of the comment responses that were received within the 30-day public comment period are included in Section A.1.2 and are summarized in Section A.1.3.

Public and Agency Comments on the Final Environmental Assessment and Draft FNSI

As noted in Section 1.2, public involvement includes public comment on the final EA and draft FNSI. 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 final EA was available for public and agency comment for a 30-calendar-day review period (starting with the publication of the Notice of Availability) 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 Scoping Coordination

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

<u>Agency</u>	<u>Date</u>
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Mr. Ben Stuckart, Spokane City Council President	October 21, 2013
Ms. Maia Bellon, Washington State Department of Ecology	October 21, 2013
Ms. Christine Reichgott, USEPA Region 10 NEPA Coordinator	October 21, 2013
Dr. Willie R. Taylor, Office of Environmental Policy and Compliance	October 21, 2013
Ms. Linda R. Charest, HUD BRAC Coordinator	October 21, 2013

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Mayor David Condon
Spokane City Hall
808 W. Spokane Falls Blvd.
Spokane, WA 99201

Dear Mayor Condon:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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 disposal and reuse of the Mann USARC is to meet the requirements of the Base Realignment and Closure Act. The Mann USARC is located at 4415 North Market Street, Spokane, Washington. The site is approximately 7 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. Five alternatives are being considered for the proposed action and all would occur at the current location of the Mann 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 Mann 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's policy is to

provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment.

Unfortunately, due to vandalism that occurred to the buildings in the fall of 2012, the Local Redevelopment Authority's (LRA) original redevelopment plan of transferring the property to the Spokane School District for educational purposes was withdrawn. The LRA reopened the notice of interest (NOI) process to find a new reuse for the property. An NOI was received from the Bureau of Indian Affairs (BIA), but the Army deemed transfer to the BIA was not a viable option as they are a federal agency that did not identify a property need within the 6-month period after the date of approval of closure and realignment of the Mann USARC. For this reason, the Army is moving forward with the disposal process, i.e., disposing of the property via public sale.

Alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Mann USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

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- Alternative 3 – Community Facility Use
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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:

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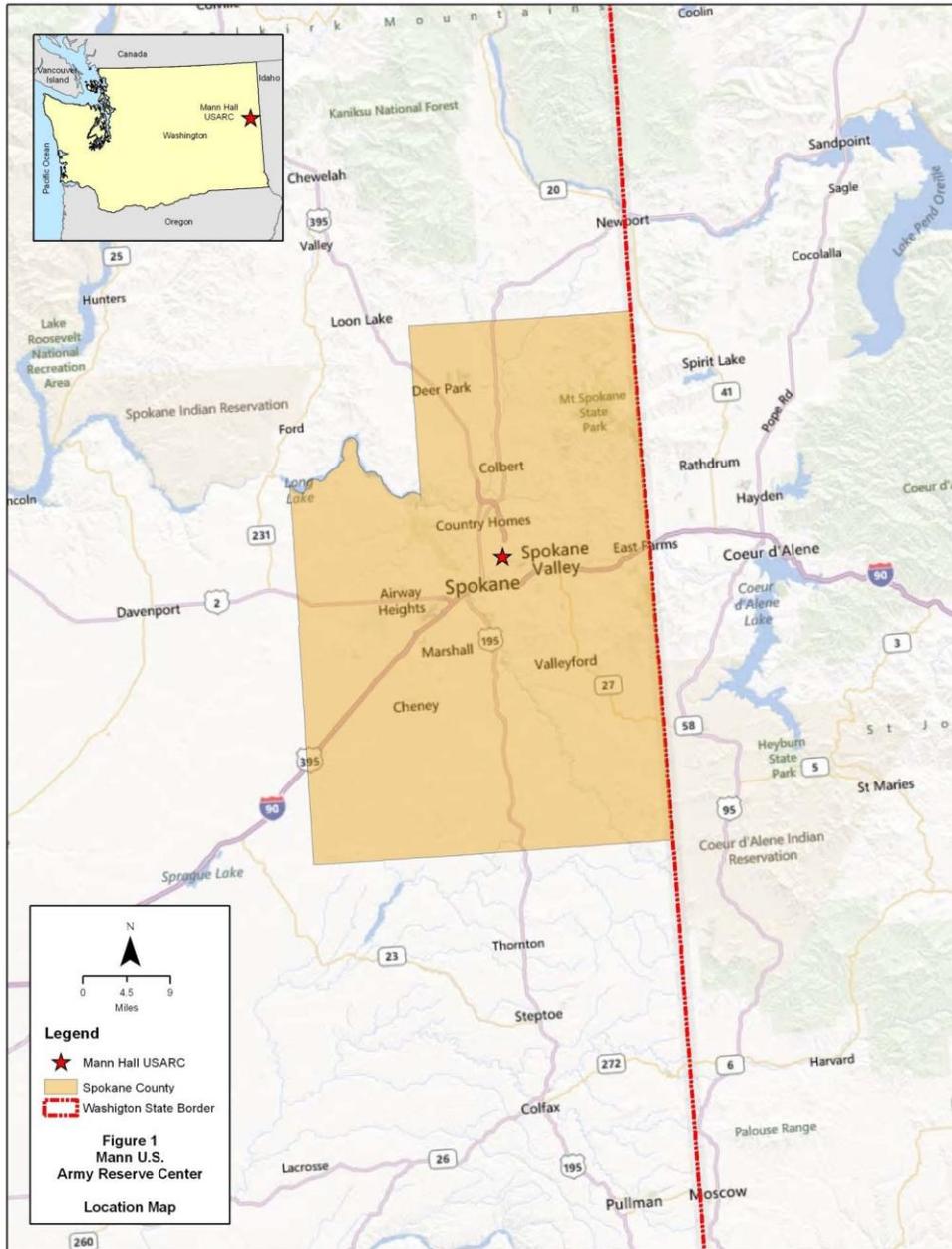
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Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures







DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Mr. Ben Stuckart
City Council President
808 W. Spokane Falls Blvd.
Spokane, WA 99201

Dear Mr. Stuckart:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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 disposal and reuse of the Mann USARC is to meet the requirements of the Base Realignment and Closure Act. The Mann USARC is located at 4415 North Market Street, Spokane, Washington. The site is approximately 7 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. Five alternatives are being considered for the proposed action and all would occur at the current location of the Mann 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 Mann 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's policy is to

provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment.

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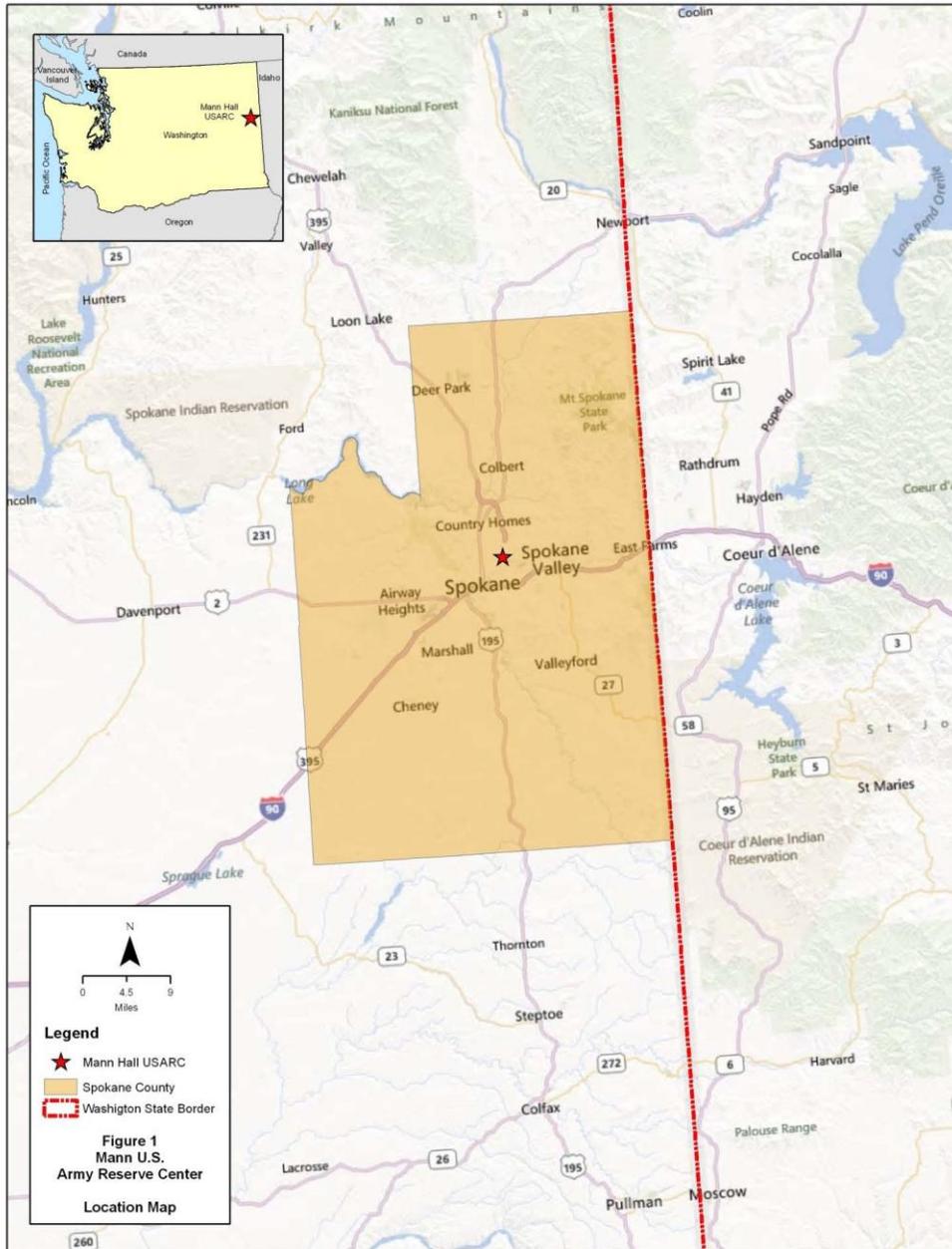
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Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures







DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Ms. Maia Bellon, Director
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Bellon:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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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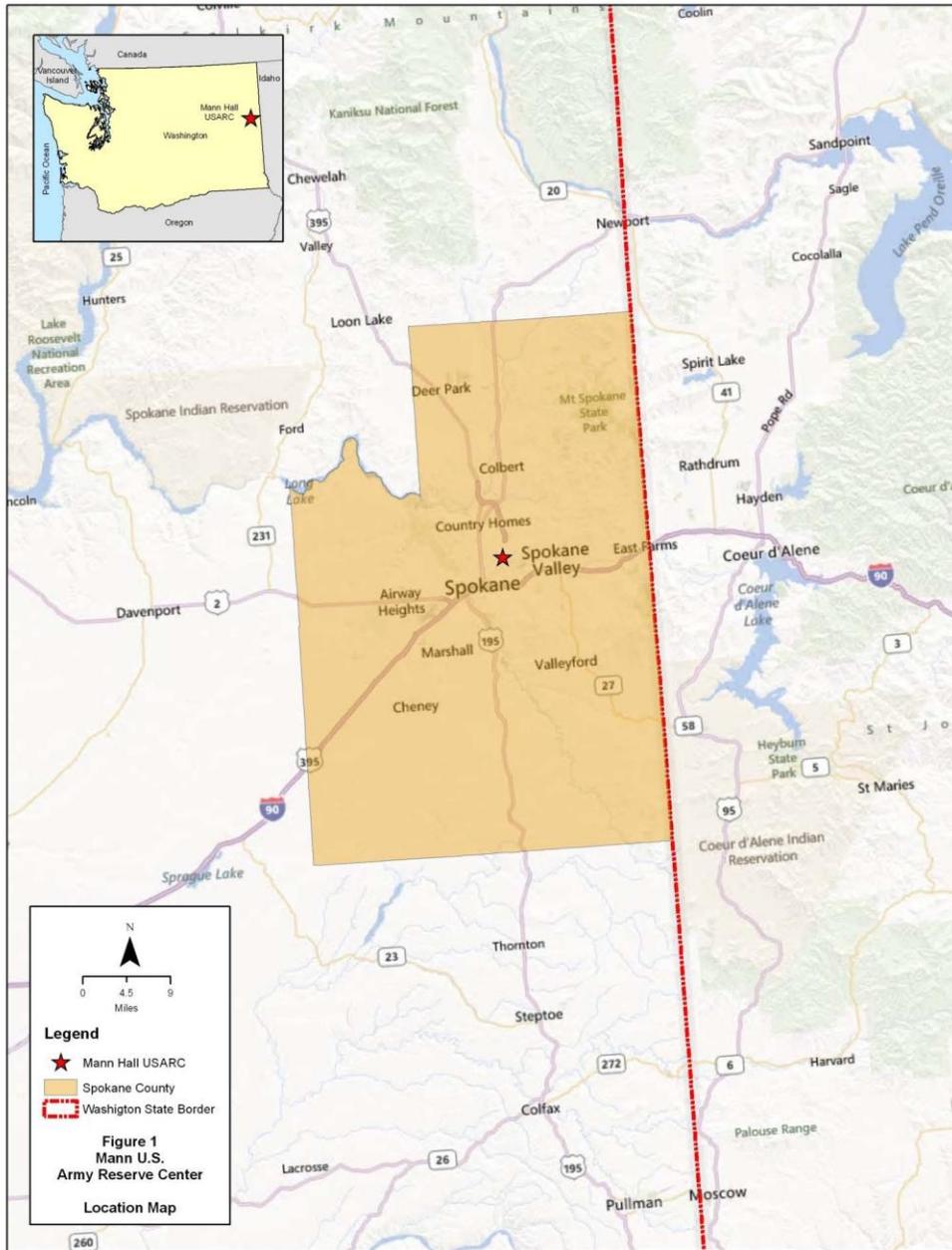
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Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures







STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

June 6, 2011

Ms. Meline Skeldon
BRAC Environmental Coordinator
Environmental Protection Specialist
88th Regional Support Command
4570 Texas Way West
Seattle, Washington 98199-1015

RE: Finding of Suitability to Transfer (FOST) for PFC Joe E. Mann US Army Reserve Center, 4415 North Market Street, Spokane, Washington, 99207. May 2011.

Dear Ms. Skeldon:

The Department of Ecology (Ecology) has reviewed the FOST for the above-referenced property. We have checked our database for the Closure of the Underground Storage Tanks at this location and found that our records indicate the closure and subsequent cleanup of these USTs.

Based on the information in the FOST, Ecology believes that you have adequately disclosed the property conditions to the potential recipient, and concurs with the overall findings of your FOST.

Thank you for your attention to this matter. If you have any questions, please contact me at (360) 407-7236.

Sincerely,

Barry Rogowski, Unit Manager
Toxics Cleanup Program
Land and Aquatic Lands Cleanup Section
Land Cleanup Unit



88th Regional Support Command
ATTN: Meline Skeldon
BRAC Environmental Coordinator
4570 Texas Way West
Ft. Lawton, WA 98136

88th RSC

Transmittal Letter

To: Mr. Chris Maurer **From:** Meline Skeldon
Washington State Department of Ecology **Date:** 6 May 2011
Phone: **Phone:**
Re: Draft FOST for transfer of US Army Reserve **CC:**
Center to Department of Education
Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

•Comments:

Mr. Maurer,

The PFC Joe E. Mann US Army Reserve Center in Spokane, WA, was designated for closure under the Base Realignment and Closure (BRAC) 2005. The draft Finding of Suitability to Transfer (FOST) and supporting environmental documentation has been prepared to support the transfer of the Mann US Army Reserve Center in Spokane, Washington, to the Department of Education.

The draft FOST is enclosed. A 30-day public comment period will begin on Sunday May 8, 2011, and end on June 8, 2011.

If you have any questions, please do not hesitate to contact me.

Regards,

Meline Skeldon
BRAC Environmental Coordinator
206-301-2177
Meline.skeldon@us.army.mil



DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Ms. Christine Rechgott, NEPA Coordinator
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Rechgott:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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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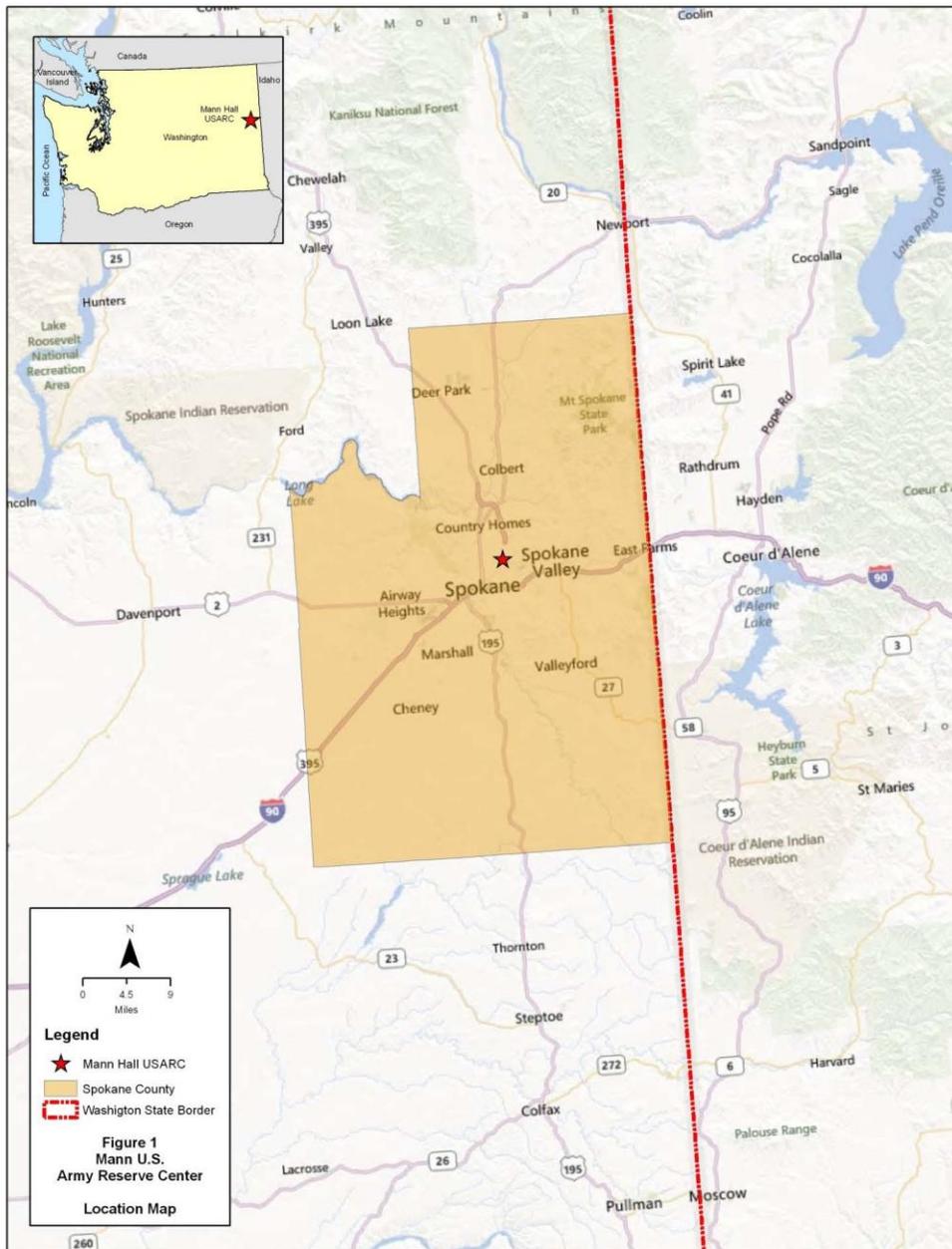
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Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures





From: Harney.Nancy@epamail.epa.gov
Sent: Friday, May 13, 2011 9:40 AM
To: Skeldon, Meline E Ms CTR 88TH RSC -NA-
Cc: Rogowski, Barry (ECY); Yamamoto, Deb@epamail.epa.gov
Subject: Re: Mann Army Reserve Center_Draft FOST available for Comment_30 Day comment Period (UNCLASSIFIED)
Attachments: WA Spokane_Mann_FOST Draft_6 May 2011.pdf; Mann USARC Site Map.pdf; Transmittal to USEPA Region 10.doc

I understand that you are probably required to notify EPA about the closure of this reserve center under BRAC 05. However, the Mann Army Reserve Center is not a listed Superfund site, i.e. the site is not on the NPL, and therefore, EPA has no regulatory oversight role under BRAC 05. DOD has not provided EPA with the resources to review and comment on any documents or work conducted at the Mann Army Reserve Center. Due to Region 10's limited resources, EPA is not involved in the BRAC 05 process. The Washington Department of Ecology is the lead regulator for non-NPL sites and they should be involved in the review of this FOST.

If you have any further questions, I would be happy to talk to you, so please feel free to call me.

Nancy Harney
Superfund Project Manager/Federal Facilities Program Manager U.S. EPA, Region 10 Office of Environmental Cleanup
(206) 553-6635
harney.nancy@epa.gov

From: "Skeldon, Meline E Ms CTR 88TH RSC -NA-"
<meline.skeldon@usar.army.mil>
To: Nancy Harney/R10/USEPA/US@EPA
Date: 05/06/2011 02:39 PM
Subject: Mann Army Reserve Center_Draft FOST available for Comment_30 Day comment Period (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Dear Ms. Harney,

The PFC Joe E. Mann US Army Reserve Center in Spokane, WA, was designated for closure under the Base Realignment and Closure (BRAC) 2005. The draft Finding of Suitability to Transfer (FOST) and supporting environmental documentation has been prepared to support the transfer of the Mann US Army Reserve Center in Spokane, Washington, to the Department of Education.

The draft FOST is enclosed. A 30-day public comment period will begin on Sunday May 8, 2011, and end on June 8, 2011.

*Please let me know if you would like me to send you a Hard Copy document.

1

88th Regional Support Command
ATTN: Meline Skeldon
BRAC Environmental Coordinator
4570 Texas Way West
Seattle, WA 98199

88th RSC

Transmittal Letter

To: Ms. Nancy Hamey **From:** Meline Skeldon
Federal Facilities, USEPA Region 10 **Date:** 6 May 2011
Phone: **Phone:** 206-301-2177
Re: Draft FOST for transfer of US Army Reserve **CC:**
Center to the Department of Education
Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

•Comments:

Ms. Hamey,

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BRAC Environmental Coordinator
206-301-2177
Meline.skeldon@us.army.mil



DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Dr. Willie R. Taylor, Director
U.S. Department of the Interior
1849 C Street, NW (MS 2462)
Washington DC 20240

Dear Mr. Taylor:

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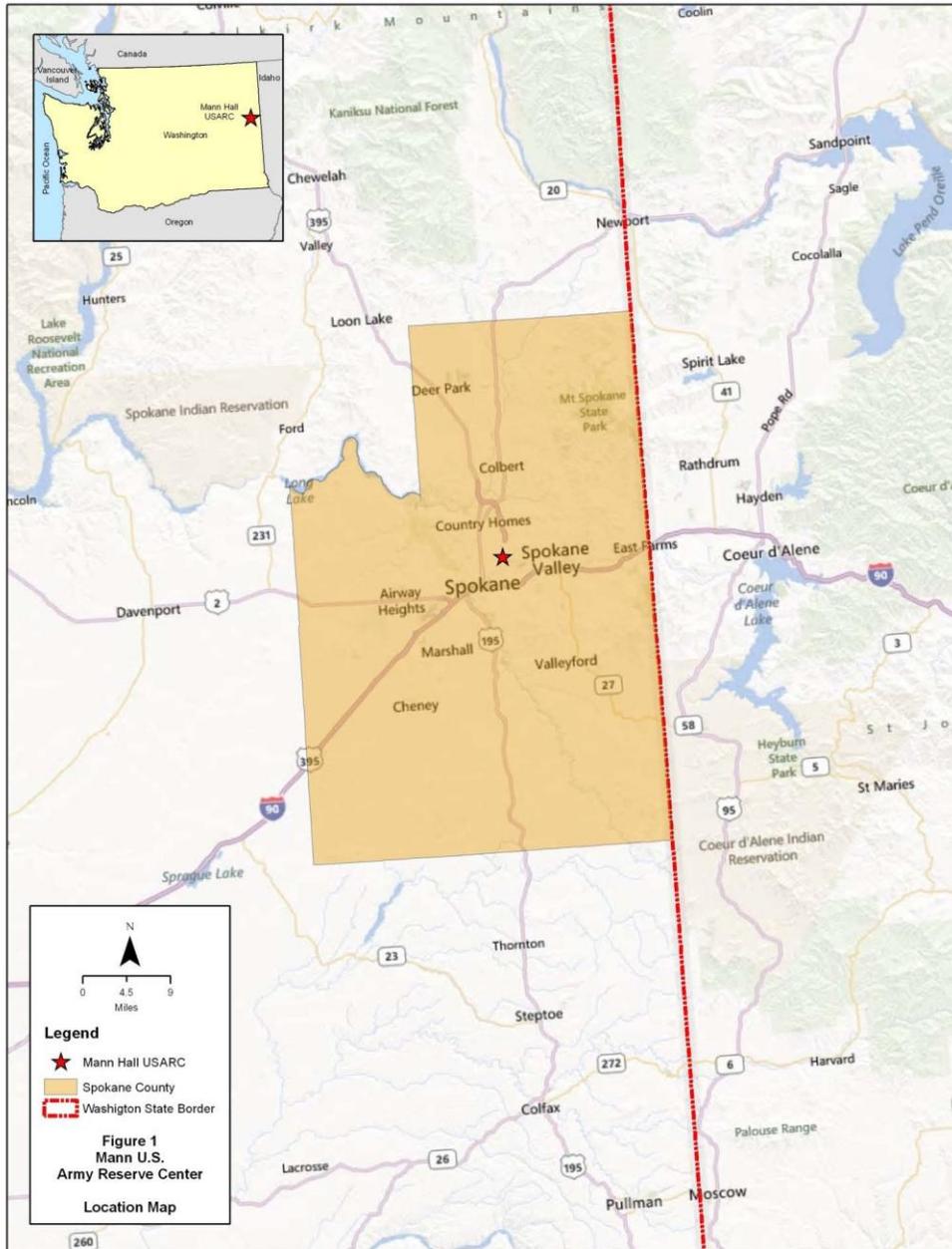
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Chief, Public Works- Environmental Division

Enclosures







DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Ms. Linda R. Charest, BRAC Coordinator
Dept. of Housing and Urban Development
451 7th Street, SW. Room 7266
Washington DC 20410

Dear Ms Charest:

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NEPA requires that alternatives to the proposed action are analyzed. Five alternatives are being considered for the proposed action and all would occur at the current location of the Mann 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 Mann 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's policy is to

provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment.

Unfortunately, due to vandalism that occurred to the buildings in the fall of 2012, the Local Redevelopment Authority's (LRA) original redevelopment plan of transferring the property to the Spokane School District for educational purposes was withdrawn. The LRA reopened the notice of interest (NOI) process to find a new reuse for the property. An NOI was received from the Bureau of Indian Affairs (BIA), but the Army deemed transfer to the BIA was not a viable option as they are a federal agency that did not identify a property need within the 6-month period after the date of approval of closure and realignment of the Mann USARC. For this reason, the Army is moving forward with the disposal process, i.e., disposing of the property via public sale.

Alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Mann USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Mann USARC property is in an area that is zoned by the City of Spokane as CC2-DC, Type 2 Center and Corridor – District Center, a district that allows for residential, office, retail, and light industrial uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property. Under these reuse alternatives the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

- Alternative 3 – Community Facility Use
- Alternative 4 – Full Build-out As Commercial
- Alternative 5 – Full Build-out As Limited Industrial/Manufacturing

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.

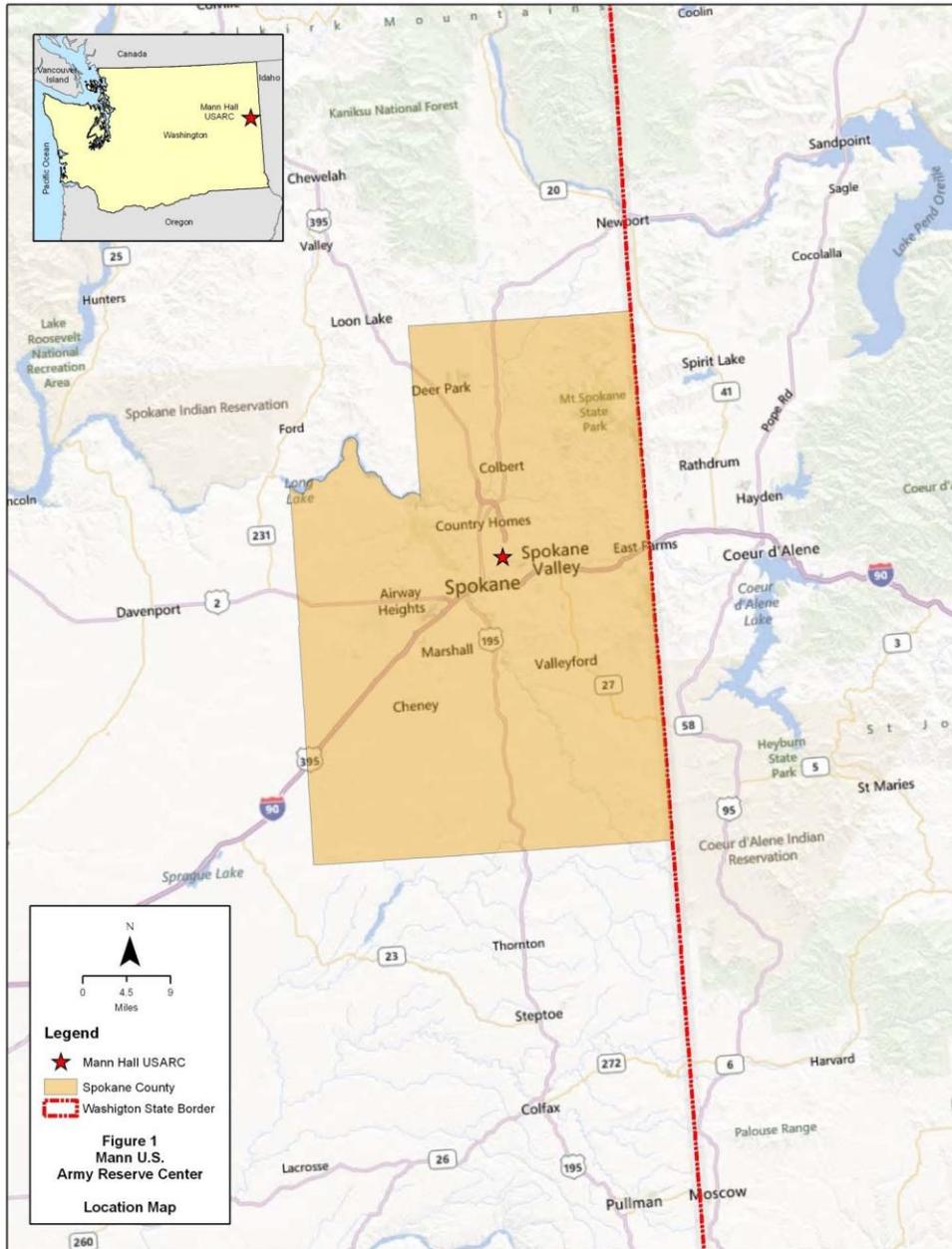
I would like to thank you in advance for your efforts. We request your comments on the proposed undertaking within 30 calendar days of receiving this correspondence. Comments received during this time will be used in preparation of the EA. Written comments and correspondence regarding this matter should be submitted to Ms. Meline Skeldon at the address above. If you require additional information, please contact Ms. Skeldon at 425-354-2497 or by email at meline.e.skeldon2.ctr@mail.mil.

Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures





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 State Historic Preservation Officer (SHPO) and Native American tribes

<u>Agency/Tribe</u>	<u>Date</u>
Mr. Russell Holter, State of Washington Department of Archaeology & Historic Preservation	December 17, 2010
State of Washington Department of Archaeology & Historic Preservation (Response)	January 5, 2011
Mr. Glen Nenema, Kalispel Indian Community of Kalispel Reservation	October 21, 2013
Mr. Rudy Peone, Spokane Tribe	October 21, 2013
Mr. Chief J, Allan, Coeur d'Alene Tribe	October 21, 2013
Mr. John Sirios, Confederated Tribes of the Colville Reservation	October 21, 2013

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REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

17 December 2010

Directorate of Public Works

Mr. Russell Holter, Preservation Design Reviewer
Department of Archaeology & Historic Preservation
1063 South Capitol Way, Suite 106
Olympia, WA 98501

Dear Mr. Holter:

The United States Army Reserve (USAR), 88th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the PFC Joe E. Mann US Army Reserve Center (USARC) in Spokane, Spokane County, Washington, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Washington. The recommendation includes the closure of the PFC Joe E. Mann USARC in Spokane, Washington and relocation of units to a new Armed Forces Reserve Center on Fairchild Air Force Base, Washington. To implement this recommendation, the US Army proposes the transfer and sale of this property from Government ownership to the Department of Education for Spokane Public Schools use as administrative and storage space.

The PFC Joe E. Mann USARC, located at 4415 North Market Street in Spokane, Washington was built in 1958 and covers approximately 7 acres and contains two buildings: the main administration building, consisting of a 27,237-square-foot administrative and classroom block with an attached drill hall; and a 10,289-square-foot Army Maintenance Support Activity building (AMSA #80). The remainder of the site is covered in pavement and gravel parking areas, with landscaped areas fronting the buildings. The Area of Potential Effect (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the PFC Joe E. Mann USARC property, including the two buildings and parking and landscaped areas on the parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the 88th RSC conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). After applying the NRHP criteria for evaluating properties, the 88th RSC has determined that there are no NRHP-eligible resources within the APE and no historic properties will be affected by the undertaking. The enclosed report (*Historic Building Survey of PFC Joe E. Mann Hall United States Army Reserve Center (WA 032), Spokane, Washington* by The Louis Berger Group, Inc.) details the architectural survey, as well as our rationale for concluding that the PFC Joe E. Mann USARC is not eligible for the NRHP. We are providing the documentation in digital format for your review.

At this time, the 88th RSC requests that you review the enclosed information pursuant to Section 106 of the NHPA. We would appreciate your comments and are requesting concurrence with our Determination of no effect for this property within 30 calendar days of receipt of this submittal. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88th RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at meline.skeldon@usar.army.mil.

Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosure



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

January 5, 2011

Mr. David Moore
Chief of Public Works
Headquarters, 88th Regional Support Command
60 South O Street
Fort McCoy, WI 54656

In future correspondence please refer to:
Log: 010511-24-DOA
Property: PFC Joseph E. Mann Army Reserve Hall
Re: NOT Eligible

Dear Mr. Moore:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced property has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

Research indicates that the above referenced property is not currently listed in the Washington Heritage Register or National Register of Historic Places. The referenced property is NOT ELIGIBLE for the National Register of Historic Places under criterion C. As a result of this finding, further contact with DAHP is not necessary. However, if additional information on the property becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. Should you have any questions, please contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov



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DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Glen Nenema, Chairman
Kalispel Indian Community of Kalispel Reservation
PO Box 39
Usk, WA 99180-0039

Dear Chairman Nenema:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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. Further, Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties. The purpose of this letter is to inform your Tribe of an opportunity to assist the Army in identifying properties of religious or cultural significance to your Tribe in the project area and any 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 disposal and reuse of the Mann USARC is to meet the requirements of the Base Realignment and Closure Act. The Mann USARC is located at 4415 North Market Street, Spokane, Washington (Section 3, Township 25 North, Range 43 East). The site is approximately 7 acres in size and contains two permanent structures: a 27,237 square-foot main building and a 10,289 square-foot area maintenance and support activity (AMSA) building. Both buildings were constructed in 1953 of concrete block with brick veneer on concrete foundations. The remainder of the site is covered in pavement (parking) or landscaped areas (Enclosures: Figures 1 and 2).

In accordance with Section 106 of the NHPA, the 88th RSC conducted data collection, archival research, literature review, and an architectural survey to identify historic properties in the project area. The 88th RSC determined that the Mann USARC is not eligible for the National Register of Historic Places (NRHP) and that no historic properties would be affected by the proposed closure, disposal, and reuse of the property in a letter dated December 17, 2010, to the Washington State Historic Preservation Office (SHPO) (Enclosure). The Washington SHPO concurred with the determination in a letter dated January 5, 2011, and indicated that no further work is required unless archaeological deposits are discovered during construction, in which case work should cease until consultation with the SHPO and appropriate Tribes has been conducted (Enclosure).

NEPA requires that alternatives to the proposed action are analyzed. Five alternatives are being considered for the proposed action and all would occur at the current location of the Mann 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 Mann 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's policy is to provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment.

Unfortunately, due to vandalism that occurred to the buildings in the fall of 2012, the Local Redevelopment Authority's (LRA) original redevelopment plan of transferring the property to the Spokane School District for educational purposes was withdrawn. The LRA reopened the notice of interest (NOI) process to find a new reuse for the property. An NOI was received from the Bureau of Indian Affairs (BIA), but the Army deemed transfer to the BIA was not a viable option as they are a federal agency that did not identify a property need within the 6-month period after the date of approval of closure and realignment of the Mann USARC. For this reason, the Army is moving forward with the disposal process, i.e., disposing of the property via public sale.

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Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Mann USARC property is in an area that is zoned by the City of Spokane as CC2-DC, Type 2 Center and Corridor – District Center, a district that allows for residential, office, retail, and light industrial uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property. Under these reuse alternatives the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

- Alternative 3 – Community Facility Use
- Alternative 4 – Full Build-out As Commercial
- Alternative 5 – Full Build-out As Limited Industrial/Manufacturing

Through this letter, the 88th RSC is initiating consultation with your Tribe regarding properties that may be affected by the proposed closure, disposal, and reuse of the Mann USARC. We request your comments on the project within 30 days of receiving this letter. Written comments and correspondence regarding this matter should be submitted to Ms. Meline Skeldon at the address above. If you require additional information, please contact Ms. Skeldon at 425-354-2497 or by email at meline.e.skeldon2.ctr@mail.mil.

Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures



DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Rudy Peone, Chairman
Spokane Tribe
PO Box 100
Wellpinit, WA 99040

Dear Chairman Peone:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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. Further, Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties. The purpose of this letter is to inform your Tribe of an opportunity to assist the Army in identifying properties of religious or cultural significance to your Tribe in the project area and any 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 disposal and reuse of the Mann USARC is to meet the requirements of the Base Realignment and Closure Act. The Mann USARC is located at 4415 North Market Street, Spokane, Washington (Section 3, Township 25 North, Range 43 East). The site is approximately 7 acres in size and contains two permanent structures: a 27,237 square-foot main building and a 10,289 square-foot area maintenance and support activity (AMSA) building. Both buildings were constructed in 1953 of concrete block with brick veneer on concrete foundations. The remainder of the site is covered in pavement (parking) or landscaped areas (Enclosures: Figures 1 and 2).

In accordance with Section 106 of the NHPA, the 88th RSC conducted data collection, archival research, literature review, and an architectural survey to identify historic properties in the project area. The 88th RSC determined that the Mann USARC is not eligible for the National Register of Historic Places (NRHP) and that no historic properties would be affected by the proposed closure, disposal, and reuse of the property in a letter dated December 17, 2010, to the Washington State Historic Preservation Office (SHPO) (Enclosure). The Washington SHPO concurred with the determination in a letter dated January 5, 2011, and indicated that no further work is required unless archaeological deposits are discovered during construction, in which case work should cease until consultation with the SHPO and appropriate Tribes has been conducted (Enclosure).

NEPA requires that alternatives to the proposed action are analyzed. Five alternatives are being considered for the proposed action and all would occur at the current location of the Mann 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 Mann 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's policy is to provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment.

Unfortunately, due to vandalism that occurred to the buildings in the fall of 2012, the Local Redevelopment Authority's (LRA) original redevelopment plan of transferring the property to the Spokane School District for educational purposes was withdrawn. The LRA reopened the notice of interest (NOI) process to find a new reuse for the property. An NOI was received from the Bureau of Indian Affairs (BIA), but the Army deemed transfer to the BIA was not a viable option as they are a federal agency that did not identify a property need within the 6-month period after the date of approval of closure and realignment of the Mann USARC. For this reason, the Army is moving forward with the disposal process, i.e., disposing of the property via public sale.

Alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Mann USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Mann USARC property is in an area that is zoned by the City of Spokane as CC2-DC, Type 2 Center and Corridor – District Center, a district that allows for residential, office, retail, and light industrial uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property. Under these reuse alternatives the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

- Alternative 3 – Community Facility Use
- Alternative 4 – Full Build-out As Commercial
- Alternative 5 – Full Build-out As Limited Industrial/Manufacturing

Through this letter, the 88th RSC is initiating consultation with your Tribe regarding properties that may be affected by the proposed closure, disposal, and reuse of the Mann USARC. We request your comments on the project within 30 days of receiving this letter. Written comments and correspondence regarding this matter should be submitted to Ms. Meline Skeldon at the address above. If you require additional information, please contact Ms. Skeldon at 425-354-2497 or by email at meline.e.skeldon2.ctr@mail.mil.

Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures



DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

Chief J. Allan, Chairman
Coeur d'Alene Tribe
850 A Street
Plummer, ID 83851

Dear Chairman Allan:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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The purpose and need of the disposal and reuse of the Mann USARC is to meet the requirements of the Base Realignment and Closure Act. The Mann USARC is located at 4415 North Market Street, Spokane, Washington (Section 3, Township 25 North, Range 43 East). The site is approximately 7 acres in size and contains two permanent structures: a 27,237 square-foot main building and a 10,289 square-foot area maintenance and support activity (AMSA) building. Both buildings were constructed in 1953 of concrete block with brick veneer on concrete foundations. The remainder of the site is covered in pavement (parking) or landscaped areas (Enclosures: Figures 1 and 2).

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Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures



DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

21 October 2013

Directorate of Public Works

John Sirios, Chairman
Confederated Tribes of the Colville Reservation
PO Box 150
Nespelem, WA 99155-0150

Dear Chairman Sirios:

The United States Army Reserve 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the PFC Joe E. Mann U.S. Army Reserve Center (Mann 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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Unfortunately, due to vandalism that occurred to the buildings in the fall of 2012, the Local Redevelopment Authority's (LRA) original redevelopment plan of transferring the property to the Spokane School District for educational purposes was withdrawn. The LRA reopened the notice of interest (NOI) process to find a new reuse for the property. An NOI was received from the Bureau of Indian Affairs (BIA), but the Army deemed transfer to the BIA was not a viable option as they are a federal agency that did not identify a property need within the 6-month period after the date of approval of closure and realignment of the Mann USARC. For this reason, the Army is moving forward with the disposal process, i.e., disposing of the property via public sale.

Alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Mann USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Mann USARC property is in an area that is zoned by the City of Spokane as CC2-DC, Type 2 Center and Corridor – District Center, a district that allows for residential, office, retail, and light industrial uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property. Under these reuse alternatives the current USARC buildings are assumed to be renovated and reused, or they would be demolished and new facilities would be constructed.

- Alternative 3 – Community Facility Use
- Alternative 4 – Full Build-out As Commercial
- Alternative 5 – Full Build-out As Limited Industrial/Manufacturing

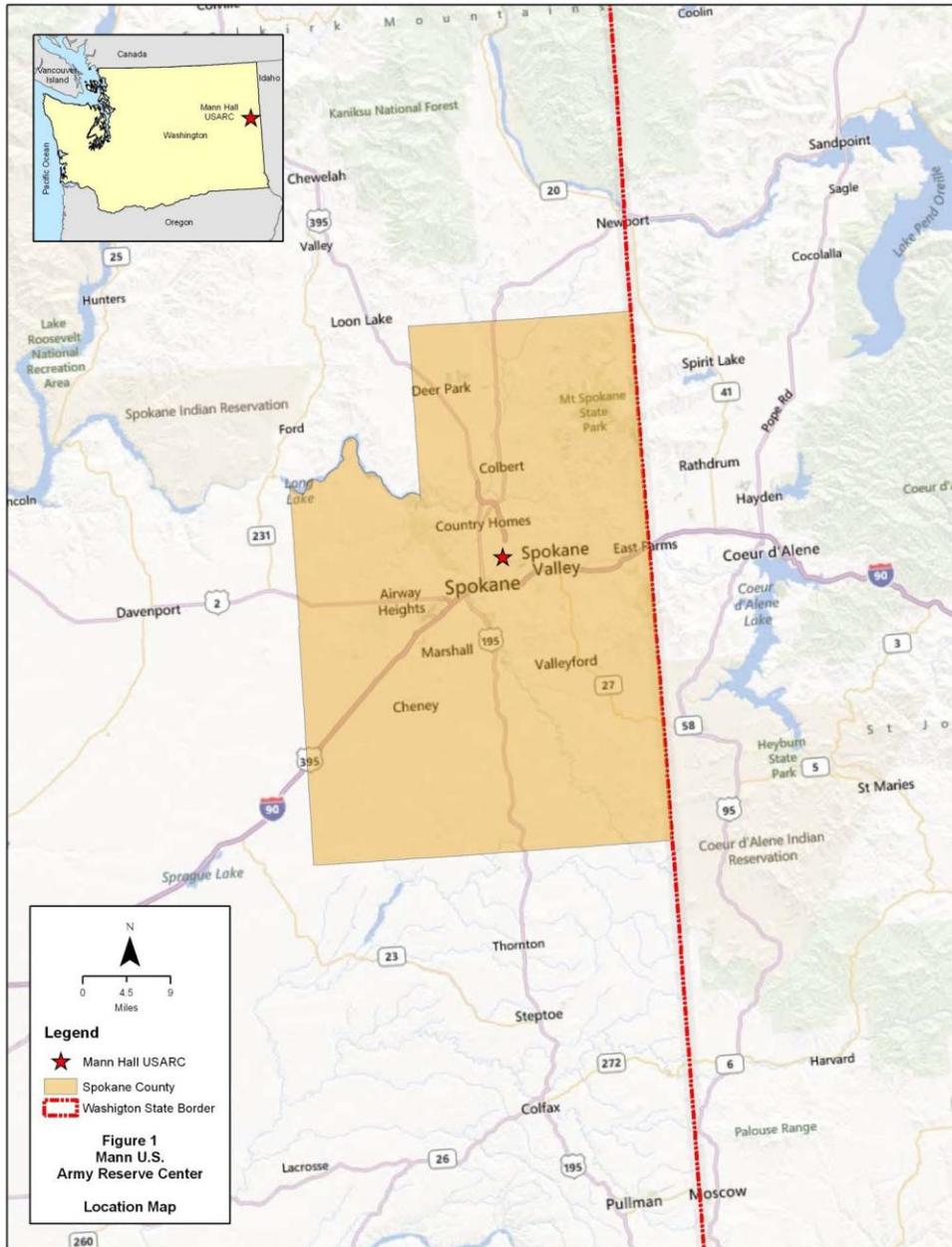
Through this letter, the 88th RSC is initiating consultation with your Tribe regarding properties that may be affected by the proposed closure, disposal, and reuse of the Mann USARC. We request your comments on the project within 30 days of receiving this letter. Written comments and correspondence regarding this matter should be submitted to Ms. Meline Skeldon at the address above. If you require additional information, please contact Ms. Skeldon at 425-354-2497 or by email at meline.e.skeldon2.ctr@mail.mil.

Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosures







REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

17 December 2010

Directorate of Public Works

Mr. Russell Holter, Preservation Design Reviewer
Department of Archaeology & Historic Preservation
1063 South Capitol Way, Suite 106
Olympia, WA 98501

Dear Mr. Holter:

The United States Army Reserve (USAR), 88th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the PFC Joe E. Mann US Army Reserve Center (USARC) in Spokane, Spokane County, Washington, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Washington. The recommendation includes the closure of the PFC Joe E. Mann USARC in Spokane, Washington and relocation of units to a new Armed Forces Reserve Center on Fairchild Air Force Base, Washington. To implement this recommendation, the US Army proposes the transfer and sale of this property from Government ownership to the Department of Education for Spokane Public Schools use as administrative and storage space.

The PFC Joe E. Mann USARC, located at 4415 North Market Street in Spokane, Washington was built in 1958 and covers approximately 7 acres and contains two buildings: the main administration building, consisting of a 27,237-square-foot administrative and classroom block with an attached drill hall; and a 10,289-square-foot Army Maintenance Support Activity building (AMSA #80). The remainder of the site is covered in pavement and gravel parking areas, with landscaped areas fronting the buildings. The Area of Potential Effect (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the PFC Joe E. Mann USARC property, including the two buildings and parking and landscaped areas on the parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the 88th RSC conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). After applying the NRHP criteria for evaluating properties, the 88th RSC has determined that there are no NRHP-eligible resources within the APE and no historic properties will be affected by the undertaking. The enclosed report (*Historic Building Survey of PFC Joe E. Mann Hall United States Army Reserve Center (WA 032), Spokane, Washington* by The Louis Berger Group, Inc.) details the architectural survey, as well as our rationale for concluding that the PFC Joe E. Mann USARC is not eligible for the NRHP. We are providing the documentation in digital format for your review.

At this time, the 88th RSC requests that you review the enclosed information pursuant to Section 106 of the NHPA. We would appreciate your comments and are requesting concurrence with our Determination of no effect for this property within 30 calendar days of receipt of this submittal. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88th RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at meline.skeldon@usar.army.mil.

Sincerely,



David L. Moore
Chief, Public Works- Environmental Division

Enclosure



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

January 5, 2011

Mr. David Moore
Chief of Public Works
Headquarters, 88th Regional Support Command
60 South O Street
Fort McCoy, WI 54656

In future correspondence please refer to:
Log: 010511-24-DOA
Property: PFC Joseph E. Mann Army Reserve Hall
Re: NOT Eligible

Dear Mr. Moore:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHHP). The above referenced property has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

Research indicates that the above referenced property is not currently listed in the Washington Heritage Register or National Register of Historic Places. The referenced property is NOT ELIGIBLE for the National Register of Historic Places under criterion C. As a result of this finding, further contact with DAHP is not necessary. However, if additional information on the property becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. Should you have any questions, please contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov



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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

Agency

Date

88th RSC, Memorandum for Record (Section 7 Listed Species
Determination of No Effect)

January 14, 2010



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

14 January 2010

Directorate of Public Works

MEMORANDUM FOR RECORD

SUBJECT: US Army Reserve Center, PFC Joe E. Mann (USARC) Spokane, WA, BRAC Disposal, Listed Species Determination of No Effect

1. The US Army Reserve (USAR) 88th Regional Support Command, (RSC), based on a decision by the Base Closure and Realignment Commission (BRAC), proposes to dispose of the existing PFC Joe E. Mann USARC in Spokane County, in Spokane, WA. The action involves disposal of the property with ownership proposed to be transferred to the local Spokane Public School system. Long term plans, assuming funding become available around 2015, are to redevelop the site as small alternative high school. The area evaluated encompasses approximately 7 acres located at N 4415 Market Street, Spokane, WA 99207 hereafter referred to as the "Property". The Property location is on the following approximate coordinates: 47.697 N, -117.366 W. The Property is currently used as an Army Reserve Center.

The Property is bordered to the north and west by residential development. Located south and east of the Property are commercial businesses.

2. To begin Endangered Species Act - Section 7 documentation, the 88th Regional Support Command (RSC) completed a Natural Resource Survey (BHE Environmental) on 20 August 2009 on the property 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/wafwo/pdf/SpokaneCounty092910.pdf>).

The 88th RSC staff has carefully reviewed the U.S. Fish and Wildlife technical assistance website again on 14 January 2011, for federally listed threatened and endangered species (see attached). According to the USFWS website in Spokane County, Washington, five species exist as federally endangered, and one as a candidate species. No suitable habitat is present on or adjacent to the fully developed Property site.

3. The site survey on 20 August 2009 determined that no wetlands were present on or near the site. No species-specific protection measures are planned at this time due to the lack of known federal threatened endangered or candidate species or potentially suitable habitat on the Property.

4. Previous phone conversations with Ms. Michelle Eames Ecological Services, USFWS Upper Columbia Fish and Wildlife Office, 11103 East Montgomery Drive, Spokane, Washington 99206, at 509-893-8010 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

SUBJECT: WA032 PFC Joe E. Mann USARC/AMSA Spokane, Washington, BRAC disposal,
Listed Species Determination of No Effect

Memorandum for Record be filed in our office documenting the determination. This document fulfills 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. Michelle Eames

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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 Notice of Availability) was established to provide all agencies, organizations, and individuals with the opportunity to comment on the EA and FNSI. An NOA was published in local and regional newspapers to inform the public that the EA and FNSI were available for review. The newspapers were:

- *The Spokesman-Review*
- *Pacific Northwest Inlander*

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:

- Spokane Public Library
- North Spokane Public Library

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APPENDIX B – AIR CONFORMITY APPLICABILITY ANALYSIS

Introduction

A General Air Conformity Applicability Analysis was conducted to determine if increases in air pollution from the construction project associated with the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the Mann U.S. Army Reserve Center (USARC), Washington would affect compliance with National Ambient Air Quality Standards (NAAQS). The project will occur within a U.S. Environmental Protection Agency (USEPA) designated maintenance area for PM 10, and carbon monoxide (CO) and is therefore subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.

The 1990 amendments to the Federal CAA, Section 176 required the USEPA to promulgate rules to ensure that federal actions that produce emissions of any criteria air pollutants for which an area is not in attainment conform to the appropriate State Implementation Plan (SIP). These resulting rules, known together as the General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), require 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 or positively determine that the action conforms to the provisions and objectives of the applicable SIP. Any mitigation deemed necessary as a result of the conclusions reached in the conformity analysis would be implemented and integrated into the Washington State Department of Ecology (WSDOE) SIP.

The General Conformity Rule requires an assessment of the magnitude of potential total emissions of non-attainment criteria pollutants, including their precursors, associated with a proposed federal action when determining conformity of that action. The rule does not apply to certain "exempt" actions or to actions where the total emissions of criteria pollutants are at or below specified *de minimis* levels. In addition, ongoing activities currently being conducted are exempt from the rule as long as there is no net increase in emissions above the specified *de minimis* levels. If the predicted emissions exceed the *de minimis* levels, a formal air conformity determination is necessary. If the *de minimis* levels are not exceeded, and if the predicted emissions do not exceed 10 percent of a non-attainment area's total emission budget for a given pollutant, a record of non-applicability must be prepared.

For purposes of determining a project's emissions, emissions are those directly associated with project activities at the time and location of the project. For the proposed action, emissions include those from routine operational activities and operation of permitted emission sources, as well as actual construction activities, construction vehicles and equipment, and any ancillary emissions sources.

Site Description

The Property is located at 4415 North Market Street, Spokane, Washington. In 1947, the U.S. Government purchased the 7-acre property. The main administrative building and the area maintenance and support activity (AMSA) shop were constructed in 1953.

The USARC contains two permanent structures and two parking lots including a military equipment parking (MEP) area and privately owned vehicle (POV) parking. A chain-link security fence topped with barbed wire encloses the MEP area and the AMSA building. Both the 27,237 square-foot main building and the 10,289 square-foot AMSA building were constructed on concrete foundations with concrete block walls covered with a brick veneer.

The main building is an irregular-shaped structure with one- and two-story administrative sections, and a 1 1/2-story drill hall. The building's interior consists of office space, classrooms, a kitchen area, storage areas, a drill hall, and a mechanical room.

The AMSA shop is a five-bay, one-story irregular-shaped structure with a second level mezzanine balcony. The AMSA shop was primarily used for vehicle maintenance. A vehicle wash area consisting of a concrete pad was located southeast of the AMSA shop (USACE 2007).

The Mann USARC was most recently occupied by the 981st Medical Detachment, 396th Medical Detachment, 22nd Legal Defense Organization Trial Defense Services, 643rd (Training), and AMSA #80. The Mann USARC previously consisted of 10 full time staff and approximately 90 reservists that trained at the Mann USARC one weekend per month.

ATTACHMENT 1 – RECORD OF NON-APPLICABILITY

Current Ambient Air Quality Considerations

Emissions Evaluation

The primary emission sources for this project will be those associated with demolition and construction. Cumulative air emissions were calculated for various types of diesel engine construction vehicles and related equipment. The project qualifies for the 40CFR 93.153 (c)(1) and (c)(2)(x) exemptions because the replacement activity emissions are *de minimis* and below applicable threshold levels as shown in the calculations below.

The calculations are included solely to demonstrate the non-significant impact. A Regional Significance Review was not conducted as part of this evaluation due to the exemption clauses stated above.

Emission Factors

Emission factors (EF) were obtained from a variety of resources. These include MOVES2010a, AP-42, NONROAD 2005, and the South Coast Air Quality Management District Air Quality Handbook. Where feasible, the most conservative, i.e. protective of human health, EFs were incorporated.

Calculations

Construction Emissions

Since both Alternative 3 and Alternative 5 would require the demolition of 37,546 square feet (SF) and construction of 243,936 SF for a FAR of 0.8, the construction emissions would be the same for both alternatives.

Assumptions (Alternatives 3 and 5):

- 37,546 SF of demolition
- 243,936 SF of new construction
- 30 percent of the site would require concrete paving (building foundation and sidewalks)
- 35 percent of the site would require asphalt for parking
- Construction would occur over entire 7-acre site

Annual Emissions (TPY) – Alternatives 3 and 5		
Activity	CO	PM 10
New Building Construction	9.19	1.49
Building Demolition	0.08	0.26
Site Preparation	0.01	7.73
Asphalt Paving	2.01	0.08
Concrete Paving	1.32	0.19
Total	12.6	9.76

Assumptions (Alternative 4):

- 37,546 SF of demolition
- 243,936 SF of new commercial construction
- 457,230 SF of residential construction (multi-family)
- Two story buildings
- 40 percent of the site would require concrete paving
- 45 percent of the site would require asphalt
- Construction would occur over entire 7-acre site

Annual Emissions (TPY) – Alternative 4		
Activity	CO	PM 10
New Building Construction	26.41	4.29
Building Demolition	0.08	0.26
Site Preparation	0.01	7.73
Asphalt Paving	2.59	0.11
Concrete Paving	1.76	0.26
Total	30.84	12.65

Construction Vehicle Emissions

Activity	Annual Emissions (TPY)	
	CO	PM 10
Construction Traffic (Alternative 3)	9.90	0.07
Construction Traffic (Alternative 4)	17.30	0.14
Construction Traffic (Alternative 5)	11.08	0.08
Alternative 3 - Assumes 57 more commuter construction vehicles per day for 260 days Alternative 4 – Assume 109 more commuter construction vehicles per day for 260 days Alternative 5 – Assume 65 more commuter construction vehicles per day for 260 days		

Haul Road Emissions

Activity	Annual Emissions (TPY)	
	PM ₁₀	
Haul Road Emissions (Alternative 3, 4, 5)	0.07	

Calculations – Reuse Activity

Heating Source Emissions

The current administration building has natural gas boilers. Using the assumption that heat will be provided by natural gas boilers, the average energy intensity of non-mall buildings using natural gas in the Pacific is 29.7 cubic feet (CF) of gas annually per square foot. A residential building using all different fuel types in the Pacific has an average energy intensity of 41.5 CF annually per square foot. Assumptions for operational heating estimates were based on the most recent Commercial Energy Consumption Survey (CBECS) in 2003 and the most recent Residential Energy Consumption Survey (RECS) in 2009 conducted by the U.S. Department of Energy Information Administration. The same fuel intensity (29.7 CF) was used for Alternative 5 because it is an average for all non-mall buildings.

Emission factors were obtained from the USEPA’s AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors Volume 1: Chapter 1: Stationary Sources, Supplement D. Criteria pollutants emitted from natural gas-fired boilers include NO_x, VOCs, CO, and trace amounts of SO₂, Pb, and particulate matter.

Activity	Annual Emissions (TPY)	
	CO	PM ₁₀
Building Heating Alternative 3	0.30	0.03
Building Heating Alternative 4	1.1	0.09
Building Heating Alternative 5	0.30	0.03

TPY – Tons Per Year

All PM is assumed to be 1.0 micrometer in diameter; therefore, the PM emission factor can be used for both 2.5 and 10 (AP-42, Supplement D)

Vehicle Emissions

There would be a negligible increase in mobile emissions from commuter traffic during the renovation. Under its most recent use, the USARC had approximately 10 full-time employees

commuting weekdays and 90 additional personnel one weekend per month for training. Under the reuse, the community facility would generate approximately 340 vehicle trips per day.

Activity	Annual Emissions (TPY)	
	CO	PM 10
Commuter Traffic (Alternative 3)	12.17	0.16
Commuter Traffic (Alternative 4)	15.85	0.21
Commuter Traffic (Alternative 5)	20.9	0.27

Summary of Emissions

All Activities Combined	Annual Emissions (TPY)	
	CO	PM 10
Alternative 3	35.50	10.09
Alternative 4	65.09	13.16
Alternative 5	44.88	10.21
TPY – Tons Per Year		

APPENDIX C – EIFS REPORT

Introduction

The Economic Impact Forecast System (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.

EIFS REPORT

PROJECT NAME				
BRAC EA Mann - Alternative 3				
STUDY AREA				
53063 Spokane, WA				
FORECAST INPUT				
Change In Local Expenditures			\$20,280,000	
Change In Civilian Employment			220	
Average Income of Affected Civilian			\$46,160	
Percent Expected to Relocate			0	
Change In Military Employment			0	
Average Income of Affected Military			\$0	
Percent of Military Living On-post			0	
FORECAST OUTPUT				
Employment Multiplier			4.19	
Income Multiplier			4.19	
Sales Volume - Direct			\$23,604,690	
Sales Volume - Induced			\$75,298,940	
Sales Volume - Total			\$98,903,630	0.52%
Income - Direct			\$12,868,670	
Income - Induced)			\$13,233,320	
Income - Total (place of work)			\$26,101,980	0.29%
Employment - Direct			321	
Employment - Induced			321	
Employment - Total			642	0.27%
Local Population			0	
Local Off-base Population			0	0%
RTV SUMMARY				
	Sales Volume	Income	Employment	Population
Positive RTV	8.8 %	7.93 %	3.48 %	3.15 %
Negative RTV	-7.57 %	-7.01 %	-2.99 %	-0.76 %

EIFS REPORT

PROJECT NAME

BRAC EA Mann - Alternative 4

STUDY AREA

53063 Spokane, WA

FORECAST INPUT

Change In Local Expenditures	\$32,505,350
Change In Civilian Employment	352
Average Income of Affected Civilian	\$46,160
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Military Living On-post	0

FORECAST OUTPUT

Employment Multiplier	4.19	
Income Multiplier	4.19	
Sales Volume - Direct	\$37,811,160	
Sales Volume - Induced	\$120,617,600	
Sales Volume - Total	\$158,428,800	0.83%
Income - Direct	\$20,597,540	
Income - Induced)	\$21,197,790	
Income – Total (place of work)	\$41,795,330	0.46%
Employment - Direct	513	
Employment - Induced	514	
Employment - Total	1028	0.43%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	8.8 %	7.93 %	3.48 %	3.15 %
Negative RTV	-7.57 %	-7.01 %	-2.99 %	-0.76 %

EIFS REPORT

PROJECT NAME

BRAC EA Mann - Alternative 5

STUDY AREA

53063 Spokane, WA

FORECAST INPUT

Change In Local Expenditures	\$22,080,000
Change In Civilian Employment	239
Average Income of Affected Civilian	\$46,160
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Military Living On-post	0

FORECAST OUTPUT

Employment Multiplier	4.19	
Income Multiplier	4.19	
Sales Volume - Direct	\$25,680,230	
Sales Volume - Induced	\$81,919,940	
Sales Volume - Total	\$107,600,200	0.56%
Income - Direct	\$13,986,550	
Income - Induced)	\$14,396,920	
Income – Total (place of work)	\$28,383,460	0.31%
Employment - Direct	349	
Employment - Induced	349	
Employment - Total	698	0.29%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	8.8 %	7.93 %	3.48 %	3.15 %
Negative RTV	-7.57 %	-7.01 %	-2.99 %	-0.76 %

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

On September 8, 2005, the Defense BRAC Commission recommended closure of the PFC Joe E. Mann USARC in Spokane, Washington. This recommendation was 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 BRAC of 1990 (Public Law 101-510), as amended.

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

“Close Mann Hall Army Reserve Center, Area Maintenance Support Shop #80 and Walker Army Reserve Center in Spokane, WA, and relocate units to a new consolidated Armed Forces Reserve Center and Organizational Maintenance Shop on Fairchild Air Force Base. The new AFRC shall have the capability to accommodate units from the following Washington ARNG facilities: Washington ARNG Armory and Organizational Maintenance Shop, Geiger Field, WA, if the state decides to relocate those units.”

To implement these recommendations, the Army proposes to close the Mann 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 U.S. 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.