

Finding of No Significant Impact Base Realignment at Fort Sill, Oklahoma

Pursuant to the Council on Environmental Quality (CEQ) Regulations (Title 40 of the *Code of Federal Regulations* [CFR] Parts 1500–1508) for implementing the procedural provisions of the National Environmental Policy Act (Title 42 of the *United States Code*, Part 4321 et seq.) and Army regulation (32 CFR Part 651), Fort Sill, Oklahoma, conducted an Environmental Assessment (EA) of the potential environmental and socioeconomic effects associated with implementing the 2005 Base Realignment and Closure (BRAC) Commission’s recommendations at the installation.

PROPOSED ACTION

The BRAC Commission made six recommendations concerning Fort Sill.

- *Operational Army*. Air Defense Artillery (ADA) units at Fort Bliss, Texas, are to be relocated to Fort Sill, and an artillery brigade at Fort Sill is to be relocated to Fort Bliss.
- *Transformation of the Reserve Component in Oklahoma*. The Keathley and Burris U.S. Army Reserve Centers in Lawton and Chickasha, Oklahoma (consisting of Multiple Launch Rocket System, conventional artillery, and communications units); the Wichita Falls U.S. Army Reserve Center in Wichita Falls, Texas; the 1st, 3rd, 5th, and 6th U.S. Army Reserve Centers; and Equipment Concentration Site located on Fort Sill, Oklahoma, are to be closed. The units at those locations are to be relocated into a new Armed Forces Reserve Center on Fort Sill, and a new U.S. Army Reserve Equipment Concentration Site is to be collocated with the Oklahoma Army National Guard Maneuver Area Training Equipment Site on Fort Sill.
- *Command and control of the U.S. Army Reserve in the southwestern United States*. The Major General Harry Twaddle U.S. Armed Forces Reserve Center, Oklahoma City, Oklahoma, is to be closed, and the 95th Division (Institutional Training) is to be relocated to Fort Sill.
- *Fires Center of Excellence* (“Net Fires Center” in the recommendations). The ADA Center and School at Fort Bliss, Texas, is to be relocated to Fort Sill, and that organization is to consolidate with the Field Artillery Center and School to establish a Fires Center of Excellence at Fort Sill.
- *Consolidation of correctional facilities*. Lackland Air Force Base, Texas, Fort Knox, Kentucky, and Fort Sill are to be realigned by relocating the correctional function of each to Fort Leavenworth, Kansas, to form a single Midwest Joint Regional Correctional Facility.
- *Defense Finance and Accounting Service*. Twenty-one Defense Finance and Accounting Service nationwide sites, including the one at Fort Sill, are to be closed. The functions are to be relocated and consolidated in Ohio, Colorado, or Indiana.

Implementation of the proposed action would require renovation of existing facilities and construction of new facilities to accommodate the increase in personnel and functions assigned to Fort Sill. The proposed new buildings would provide more than 2 million square feet of space. Assignment of additional personnel to Fort Sill would also require that the Post construct several ranges.

Four associated actions are also evaluated in the EA: (1) Relocation of the German Air Force Defense School and the German Air Force Command in the United States and Canada from Fort Bliss, Texas, to Fort Sill; (2) Reconfiguration of field artillery brigades into modular Fires Brigades; (3) Relocation of the Receipt-in-Place Location (RIPL), a facility operated by the Defense Reutilization and Marketing Service for receipt of tenant organizations’ excess materiel before disposition by redistribution or sale; and (4) Construction of a Training Support Center warehouse to support BRAC-related activities.

Under the BRAC law, the Army must initiate all realignments not later than September 14, 2007, and complete all realignments not later than September 14, 2011. Implementation of the proposed action would occur over a span of approximately 5 years. Facilities renovations and new construction would be synchronized to meet the needs, on a priority basis, of units being relocated to Fort Sill.

ALTERNATIVES

Army Regulation 210-20, *Master Planning for Army Installations*, establishes Army policy to maximize use of existing facilities. Fort Sill's evaluation of its existing inventory of facilities revealed a substantial shortfall in built space to accommodate the additional personnel and equipment associated with the realignment. In a few instances, some units and functions could be assigned to existing facilities and some facilities would require renovation to adequately support new occupants, but overall the evaluation indicated that post would require more than 2 million square feet of additional space to support the proposed actions.

Determination of the locations of the new facilities and functions that would be placed in existing facilities involved consideration of compatibility between the functions to be performed and the installation's land use designation for the site, adequacy of the sites for the function, proximity to related activities, distance from incompatible activities, availability and capacity of roads, efficient use of property, development density, potential future mission requirements, and special site characteristics, including potential environmental incompatibilities. Additionally, the Army had to consider the legal requirement of completing the realignment by September 2011.

Numerous variations of the proposal for siting the facilities could have been developed, but the locations selected were found, upon consideration of the above criteria, to reflect a sound, compatible set of solutions. Alternative siting schemes would have produce different, but not better, layouts. The implementation proposed in the EA, therefore, was the only one carried forth for analysis.

CEQ regulations require inclusion of the no action alternative. The no action alternative serves as a baseline against which the impacts of the proposed action and alternatives can be evaluated. Under the no action alternative, Fort Sill would not implement the proposed action. The BRAC recommendations have the force of law and must be implemented: The no action alternative, therefore, is not possible. Consistent with CEQ requirements, however, the no action alternative is evaluated in detail in the EA.

ENVIRONMENTAL CONSEQUENCES

The environmental and socioeconomic consequences of implementation of the realignment alternative and the no action alternative are summarized below.

Realignment Alternative

Land Use and Airspace. No effects on land use or airspace would be expected. With only minor exception, the realignment plan was found to be compatible with existing land uses in the cantonment area. One of the BRAC parcels borders the Henry Post Army Airfield, but the analysis determined that a land use incompatibility due to noise from the airfield would not be created.

Aesthetics and Visual Resources. Short-term minor adverse effects on aesthetics and visual resources would be expected from the increase of construction activities, which are inherently aesthetically displeasing. In the long term, new and renovated facilities would be expected to improve the functionality of the cantonment area and improve the area's overall aesthetic and visual appeal.

Air Quality. Short- and long-term minor adverse effects on air quality would be expected. Emissions associated with construction and operation of facilities, however, would not exceed *de minimis* thresholds,

be *regionally significant*, contribute to a violation of any federal, state, or local air regulation, or contribute to a violation of Fort Sill's air operating permit.

Noise. Short- and long-term minor adverse effects on the noise environment would be expected. A short-term increase in on-post noise would result from the use of heavy construction equipment, and a long-term increase in noise would result from the use of weapons up to and including 5.56-caliber rifles at the proposed small-arms ranges. All on- and off-installation areas would be compatible with the expected changes to the noise environment.

Geology and Soils. No effects on geology, seismicity, topography, or Prime Farmlands would be expected. Long- and short-term minor adverse effects on soils would be expected from construction activities.

Water Resources. Short-term minor adverse effects on surface waters and groundwaters would be expected. Construction activities would increase soil disturbance and potentially soil erosion, and total suspended solids could thus be increased in nearby waters. Also, leakage from construction equipment could increase petroleum hydrocarbon pollution in surface waters. Waterborne contaminants contributed by construction activities could be transported into the groundwater system, though the BRAC action would not change the long-term quantity or quality of groundwater. No effects on floodplains would be expected: There are no 100-year floodplains within the proposed impact areas.

Biological Resources. Short- and long-term minor adverse effects on vegetation and wildlife would be expected. Construction activities would cause the loss of small areas of native and non-native vegetation, but disturbed areas would be revegetated with native species. Construction activities would also cause losses of habitat at construction sites. Most effects on wildlife would result from their displacement because of being disturbed by construction activities. There would be no effect on threatened, endangered, or other species of concern, or wetlands: All known habitats for sensitive species would be avoided, and no known wetlands are located in the proposed areas.

Cultural Resources. No significant adverse effects would be expected. Long-term beneficial effects would be expected with regard to adaptive reuse and continued maintenance of historic architectural properties. Potential impacts could arise from the activities in the project areas, but adherence to policies and guidelines in the Integrated Cultural Resources Management Plan and consultation with the State Historic Preservation Officer (SHPO) would be expected to avoid or mitigate potential adverse effects to a less than significant level. Construction of facilities would result in adverse impacts if archaeological resources eligible for the National Register of Historic Places were adversely impacted by ground disturbance or if construction resulted in visual impacts to a nearby historic property's setting. Before Fort Sill would begin construction activities, it would identify historic properties, determine whether adverse impacts would occur, and develop mitigation measures, all in consultation with the Oklahoma SHPO and the eight Native American Tribes (Delaware, Wichita, Kiowa, Fort Sill Apache, Comanche, Chickasaw, Cheyenne and Arapaho, and Caddo) having cultural and historic affiliation at Fort Sill, Oklahoma.

Socioeconomics. Short- and long-term significant beneficial effects on economic development would be expected. The expenditures associated with renovation and construction of facilities on Fort Sill would increase sales volume, employment, and income in the region of influence (ROI). Short-term minor adverse effects on housing and all services would be expected from an increased demand for and reduced availability of housing and services in the ROI, and the increase in population would create a need for additional law enforcement, fire protection, and medical services; family support and social services; and shops, other services, and recreation. In the long-term, the housing market and all services could adapt to the demands of the increased population base. Short-term moderate adverse effects on schools would be expected. The incoming population would increase the number of school children in the ROI, and the Lawton Public School District schools would have to accommodate the increased student load. No

adverse effects on Environmental Justice would be expected, as the realignment of Fort Sill would not create disproportionately high or adverse human health or environmental effects on minority of low-income populations in the ROI. Long-term minor adverse effects on children could occur if families moving to Fort Sill as a result of BRAC were to occupy housing with hazardous materials (such as lead-based paint or asbestos) on Fort Sill or in the surrounding area.

Transportation. Short-term minor adverse effects on transportation would be expected during the construction and renovation phase due to additional traffic congestion and traffic delays caused by construction activities. Wear and tear on installation and surrounding roads would also likely increase.

Utilities. Short-term minor adverse effects on utilities would be expected from service interruptions during construction while new and renovated facilities are being hooked up to existing utilities systems. Only the electrical system, in its current configuration, would be inadequate to meet the added demand of incoming BRAC elements, and the additional demand would be met by the installation of a new 40-mega-watt sub-station. Long-term minor adverse effects would be expected from the consumption of landfill capacity by the construction and demolition debris generated by the Realignment Alternative.

Hazardous and Toxic Materials. No effects on hazardous or toxic materials or wastes would be expected. Facility renovations would adhere to local, federal, and Army regulations for the removal and disposal of hazardous materials, and new facilities would minimize the use of such materials. All materials handling, storage, and disposal, including that of munitions and explosives of concern, would be in accordance with applicable laws and regulations.

Cumulative Effects. No adverse cumulative effects would be expected: No specific concurrent projects have been identified, and as such no cumulative impacts are expected.

No Action Alternative

No effects on any of the resource areas considered in the EA would be expected to result from implementation of the no action alternative.

MITIGATION MEASURES

The EA identifies mitigation that would be undertaken to minimize adverse effects on the environment.

CONCLUSIONS

During the public comment period on the Final EA and draft FNSI, comments from the Comanche Nation and Caddo Nation were received and determined to not be applicable to the proposed action. While revisions to the EA or FNSI were not warranted, the installation is coordinating with all interested tribes in regards to their concerns. Based on the analysis performed in this EA, implementation of the realignment alternative would have no significant direct, indirect, or cumulative effects on the quality of the natural or human environment. Preparation of an Environmental Impact Statement is not required. Issuance of a Finding of No Significant Impact is appropriate.



JOHN UBERTI
Colonel, FA
Garrison Commander

9 November 2006

Date