

FINAL FINDING OF NO SIGNIFICANT IMPACTS

CONSTRUCTION AND OPERATION OF ARMED FORCES RESERVE CENTER NEAR NEWTOWN, CONNECTICUT

1.0 Introduction

Pursuant to Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] 1500-1508) and Army Regulations 32 CFR Part 651 (*Environmental Analysis of Army Actions*) for implementing the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code 4321 et seq.), the US Army Reserve 99th Regional Support Command (the "Army") prepared the attached environmental assessment (EA), which is incorporated by reference into this FNSI.

The EA examined the potential environmental effects associated with the construction and operation of a new Armed Forces Reserve Center (AFRC) in the vicinity of Newtown Connecticut. The EA's original proposed action was to construct and operate a training facility to support:

- The 8 US Army Reserve (USAR) and 2 Connecticut (CT) Army Reserve National Guard (ARNG) units being relocated under the 2005 BRAC Commission recommendations
- The 7 new USAR units being established under the Grow The Army (GTA) initiative.

The Army has decided to not locate the 7 GTA units at Danbury, and plans to instead initiate NEPA analysis to determine the location of those units at a future point in time. As a result of the decision to reduce the scope of the proposed action, the resulting alternatives as examined in the EA are likewise modified. The Army's original preferred alternative (Lee Farm Parcel) is selected in this FNSI, but has been modified to reflect the smaller proposed action. The proposed action selected in this FNSI represents a modified action that is well within the scope of the analysis in the EA.

2.0 Proposed Action.

The proposed action as modified is to construct and operate a 400-member AFRC which will house only the 8 USAR and 2 ARNG units designated in the BRAC Commission recommendations. The following facilities are included:

- AFRC training building (95,885 ft²)
- Vehicle maintenance shop (18,115 ft²)
- Unheated storage building (3,038 ft²)
- Paved parking (3.4 acres) for approximately 195 wheeled vehicles and 148 trailers
- Aboveground, double-walled, steel 2,000-gallon storage tank with a concrete outer shell
- Emergency generator (650-kilowatt) with a 2,000-gallon diesel fuel tank

3.0 Purpose and need

The mission of the USAR, under Title 10 of the USC, is to provide trained and ready Soldiers and units with the critical combat service and combat support capabilities necessary to support national strategy during peacetime, contingencies, and war (USAR, 2008).

The Proposed Action will enhance the ability of the USAR and the National Guard to fulfill their training requirements by allowing them to use one centralized AFRC facility. This will enhance military value, improve homeland defense capability, improve training and deployment capability, create significant efficiencies and cost savings, and is consistent with the Army's force structure plans and transformational objectives. Existing facilities in the area do not have the capacity to support the personnel and equipment of the 8 realigned Army Reserve and 2 realigned National Guard units.

If this project is not executed, the units would be forced to operate and train in facilities not properly configured to allow the most effective training to complete mission requirements; the BRAC recommendation would not be implemented; military value and homeland defense capabilities would not be enhanced; training and deployment capability would not be improved; and significant efficiencies and cost savings would not be realized.

4.0 Alternatives Analyzed in the EA

The Army considered 23 alternative site locations in this EA. The EA analyzed 3 alternative sites in detail and the No-Action Alternative. These alternatives are summarized below. A more complete description may be found in the EA.

EA Preferred Alternative (Lee Farm Parcel)

The original preferred alternative would have constructed and operated a 1,000-member AFRC on two parcels of land, totaling 30 acres, acquired from the Lee Farm with 9.5 acres of paved parking for 270 wheeled vehicles and 583 trailers to support a total of 15 USAR and 2 ARNG units as follows:

- Parcel A (12 acres). Construct the AFRC training center buildings, privately owned vehicle parking, and four small stormwater retention ponds on this parcel. Construct an entrance from Lee Farm Road.
- Parcel C (18 acres). Construct the vehicle maintenance facility, fuel point, wash platforms, loading rack and parking area; a small parking area for privately owned vehicles; and two stormwater retention ponds on this parcel. Construct an entrance from Wooster Heights Road, southwest of the intersection with Lee Farm R

Because the Proposed Action is modified, the Lee Parcel Alternative is modified as follows:

- Parcel A (12 acres). Will be left undeveloped and in private ownership. This parcel, located north of Wooster Heights Road and adjacent to the Lee Farm main complex, consists of an open grass agricultural field and a small woodlot. The EA's original Preferred Alternative was to purchase and construct a portion of the AFRC on 12 acres of this 38-acre parcel.
- Parcel C (18 acres). Will be the site for the smaller 400-member AFRC, described in Section 2.0 above. This parcel, located south of Wooster Heights Road, consists of a rolling open field surrounded by wooded areas. It is located south of Wooster Heights Road. An entrance will be constructed from Wooster Heights Road, southwest of the intersection with Lee Farm Road.

EA Alternative 2

Construct and operate a 1,000-member AFRC at 764 Southford Road in Middlebury, Connecticut. Alternate Site 2 is a 19-acre, rectangular parcel with several buildings surrounded by residential and commercial areas. The site is rocky, forested, with topography sloping from the middle of the site to the west, north, and east.

This site is not preferred, because it has several environmental and engineering constraints. This alternative would require building demolition and the construction of an entrance from Southford Road on a steeper grade. Construction and operations would result in adverse long-term impacts from the elimination of habitat areas considered by the Connecticut Department of Environmental Protection (CTDEP) as high potential uses by state-listed endangered and threatened species. Site designs incorporating military set-back mandates, and maintaining a required 50-foot no build buffer zone to minimize and avoid wetland-related impacts reduces the usable acreages.

EA Alternative 3

Construct and operate a 1,000-member AFRC at 23-29 Towner Lane in Oxford Connecticut. Alternate Site 3 is a 62-acre, irregularly shaped parcel that is surrounded by residential, commercial, and industrial areas. Alternate Site 3 includes a farm with a vacant barn, building foundations, two vacant houses, and an occupied house. The farm consists of large grassy fields separated by stone walls and wooded hedgerows on the southern portions of the parcel and woods on the northern portion of the site.

This site is not preferred, because it has several real estate and engineering constraints, including site accessibility, utility hookups for water and sewage, acquisition of right-of-way easements, avoiding wetland impacts, and building demolition and removal. Towner Lane cannot be used to access the AFRC, because large truck traffic is prohibited. Constructing an entrance along Willenbrock Road requires the acquisition of two right-of-way easements from different landowners and regulatory review of potential wetland impacts under Section 404 of the Clean Water Act. Access to the domestic drinking-water distribution line along Oxford Road requires the acquisition of right-of-way easements from adjacent property owners. The site is not connected to sanitary sewer and access to the sanitary sewer system along Oxford Road requires the construction of a lift station and the acquisition of easements. Existing structures would have to be demolished.

EA No Action Alternative

Under the No Action Alternative, the new facility would not be constructed and would result in units continuing to occupy aging, decentralized facilities that lack the capacity for expansion or consolidation, would impair the ability of units to fulfill their designated missions, and would conflict with the Commission recommendation which has the force of law.

The no action alternative would not address the purpose and need for the proposed action; however, inclusion of the no action alternative serves as a benchmark for evaluation of the potential effects of the proposed federal action. Therefore, the no action alternative is evaluated in detail in the EA.

EA Alternatives Reviewed but Not Considered in Detail

The EA eliminated 14 sites from further consideration for one or more of the following reasons:

- Unacceptable environmental losses to forests, wetlands, streams, and ponds that could not be avoided through site design
- Evidence of soil and groundwater contamination
- Steep slopes: extensive grading (cut and fill) would be required for site development
- Cumulative impacts from adjacent development
- Difficulties relating to site access and utility connections (water, sewage, gas, and electric)
- Buildings on site: construction would displace residents and require buildings demolition
- Developer would not agree to subdivide the site
- Not enough buildable acreage to construct the AFRC

Additional Alternatives Considered

In December 2010, the City of Danbury submitted six additional parcels for review by the Army as alternate sites within the city limits for construction of the AFRC. A Site Selection Team visited each of the six parcels and after considerable review determined that each were unsuitable to meet the needs of the Army. Considerations included, but were not limited to, parcel size, location, acquisition capability, military functionality, mandated military set-back requirements, access for military vehicles, traffic and transportation issues, potential site contamination from previous industrial use, constructability issues, encroachment into federally-protected species habitats, potential encroachment into the 100-year floodplain, and impacts to wetland and waters of the U.S.

3.0 Factors Considered in Determining That An Environmental Impact Statement is Not Required for the Proposed Action

The Environmental Assessment examined the potential effects of implementing the Preferred Alternative, 2 alternative sites, and for the No Action Alternative. The EA analyzed 13 resource areas and areas of environmental and socioeconomic concern: land use, air quality, noise, water resources, geology, infrastructure, hazardous and toxic substances, permits and regulatory authorizations, biological resources, cultural resources, economic development, sociological environment (including environmental justice and protection of children), and quality of life. The Proposed Action, implementing only a portion of the preferred alternative, will not have a significant direct, indirect, or cumulative impact on any of these resource areas.

Implementation of the Proposed Action will result in:

- Minor short-term adverse impacts during construction to air quality, noise, geology and soils, stormwater, vegetation, wildlife, and transportation (traffic);
- Minor long-term adverse impacts during operation to land use, aesthetics and visual resources, air quality, noise, stormwater, groundwater recharge rates, transportation (traffic), utilities from increase in demand, and hazardous and toxic materials;
- Minor beneficial impacts to the local economy;
- Minor cumulative impacts to land use, aesthetics and visual resources, air quality, noise, geology and soils, surface waters, groundwater recharge rates, biological resources, transportation (traffic), utilities, and hazardous and toxic materials;
- No cumulative impacts to prime farmlands, floodplains, coastal zones, wetlands, threatened, endangered, or rare species, migratory birds, cultural resources, housing, demographics, environmental justice, and protection of children.

The reduction in the size and scope of the EA's Proposed Action will reduce impacts on open space, traffic, noise, and other areas of environmental concern identified during the 30-day public comment period. Instead of constructing a 1,000-member AFRC on Parcels A and C of the Lee Farm lands, the Army will construct a 400-member AFRC, using only Parcel C. This reduced size and scope is an environmentally positive revision. None of the impacts of the Proposed Action are considered to be significant.

The USAR will obtain the required permits, approvals, or certifications prior to implementing construction activities. Personnel conducting construction activities will adhere to all applicable occupational safety requirements during construction activities. During construction, workers will use appropriate controls, such as flagmen, to maintain safe traffic conditions.

4.0. Actions to Minimize Potential Impacts.

The Proposed Action will mitigate impacts to open space, visual aesthetics, traffic, noise, wildlife habitat, by reducing the size and scope of the EA's Preferred Alternative and leaving Parcel A undeveloped.

The Army will conduct a preconstruction survey for nesting birds prior to clearing vegetation between April 1st to late-August. If nesting migratory birds are found, these areas will not be disturbed until the young have naturally vacated the nest, typically after mid-August.

Construction of the AFRC will occur in upland areas. The Army will maintain a 50-foot no-build buffer zone from the boundaries of delineated wetlands to prevent direct impacts to wetlands, and will maintain a greater than 50-foot buffer zone where applicable in the facility design.

5.0. Public Review and Comment

Interested parties were invited to review and comment on the final EA and draft FNSI during a 30-day public review period that ended on October 4, 2010. During the public comment period, the EA and draft FNSI were available for review on the internet at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm and at the following locations:

Southford Public Library
100 Poverty Road
Southbury CT 06488

Ruth A. Haas Library
181 White Street
Danbury, CT 06810

Town of Oxford Public Library
486 Oxford Road
Oxford, CT 06478

A summary of the written comments received on the EA and the U.S. Army's response are included in Appendix G of the final version of the EA. These comments addressed potential impacts to local traffic, negative impacts to residential neighborhood, loss of tax base and property values, loss of green space and open space in Danbury, inadequate alternative sites, aesthetic impacts, impacts to cultural resources, loss of wildlife habitats, and impacts to wetland and waterbodies from stormwater runoffs. In response to the comments submitted, the Army reduced the size and scope of the proposed project to mitigate its impacts on these resources.

6.0 Conclusion

After careful consideration of comments received from the public and government agencies, the Army has modified the EA's Preferred Alternative to reduce its size, scope, and impacts. Instead of constructing and operating a 1,000-member AFRC on 30 acres (Parcels A and C of the Lee Farm lands), the Army's Proposed Action is to construct and operate a smaller, 400-member AFRC on 18 acres (Parcel C). Parcel A (12 acres) will be left in private ownership as undeveloped open space.

Based on the EA, the Army has determined that implementation of the Proposed Action will not have significant direct, indirect, or cumulative impacts on the quality of the natural or human environment. Since there will be no significant impacts, an Environmental Impact Statement is not required. The requirements of the National Environmental Policy Act and CEQ and Army regulations have been met, and the Army may proceed with the implementation of the Proposed Action.

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Date



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