

FINDING OF NO SIGNIFICANT IMPACT

BRAC 05 Closure, Disposal, and Reuse of Walter Reed Army Medical Center, Washington, DC

Recommendations of the Base Closure and Realignment (BRAC) Commission made on 8 September 2005 pursuant to the provisions of the Defense Base Closure and Realignment Act of 1990 (Base Closure Act), Public Law (Pub. L.) 101-510, as amended, included the closure of Walter Reed Army Medical Center (WRAMC), Washington, District of Columbia (DC). In the absence of Congressional disapproval, the BRAC Commission's recommendations became binding on 9 November 2005. The 110.10 acre WRAMC installation property was determined to be surplus to Department of the Army (Army) needs, and the installation's mission was completed on 15 September 2011. The Army's excess real property interests at WRAMC will be disposed of and transferred to new owners according to applicable laws, regulations, and national policy.

Pursuant to the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations, the Army has prepared an Environmental Assessment (EA), which is incorporated in its entirety into this FNSI, to evaluate the environmental and socioeconomic impacts of closing the installation and disposing of the federal fee-owned property and to consider reasonable reuse alternatives. The EA also considers the cumulative impacts of potential redevelopment and reuse of WRAMC property by others. The EA has been developed in accordance with NEPA and associated implementing regulations issued by the Council on Environmental Quality (CEQ), Code of Federal Regulations (CFR), 40 CFR 1500–1508 and the Army implementing regulation, "Environmental Analysis of Army's Actions" (32 CFR Part 651).

Proposed Action

The proposed action is to dispose of 66.57 acres of surplus property made available by closure mandated by the BRAC Commission. The remaining 43.53 acres of WRAMC property will be transferred to the Department of State (DOS). The Walter Reed Local Redevelopment Authority (WRLRA) Reuse Plan was analyzed for potential environmental impacts that are likely to flow as a result of the closure, disposal and transfer of property from Army ownership to private ownership. This proposed action also includes caretaker operations, cleanup of contaminated sites, and possible interim leasing. The closure, disposal and reuse of the WRLRA parcel also includes the General Flag Officer's Quarters Residential Community Initiative (RCI) parcel containing Buildings 8 and 9, which are subject to an existing lease agreement. Subsequent to termination of the lease agreement this parcel may be transferred to other entities; therefore, disposal and reuse of this parcel is included in the EA.

As previously discussed, the Army will transfer the remaining 43.53 acres of the WRAMC property to DOS. Since this property remains under federal ownership and control, the reuse of the DOS parcel is not part of the proposed action for the EA. Any new construction or activities within the DOS parcel would be considered under separate NEPA analyses. Regardless, the potential reuse of the DOS parcel was evaluated as a potential cumulative effect in the EA.

Alternatives Considered

For the primary action of property disposal, the following alternatives were evaluated as part of the proposed action:

- Traditional Disposal – Transfer property using traditional disposal mechanisms;
- Caretaker Status – Secure property and continue environmental remediation; and
- No Action – Continue the mission as prior to November 2005.

For the secondary action of property reuse, a range of reuse scenarios that bound the intensity of reuse envisioned in the WRLRA Reuse Plan were used to evaluate the potential impacts associated with redevelopment of the WRLRA parcel.

Under the No Action Alternative, it is assumed that the Army would continue operations at WRAMC at levels similar to those occurring prior to the 2005 BRAC Commission's recommendation for closure. Inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which federal actions can be evaluated. Accordingly, the No Action Alternative is evaluated in the EA as a baseline for comparing the effects of the closure, disposal, and reuse alternatives on the environment, even though WRAMC has already closed. It should be noted that for closures and realignments recommended by the BRAC Commission the No Action alternative is not feasible because federal law requires that BRAC actions be implemented.

The Caretaker Status alternative would be implemented after WRAMC is closed until the property is transferred. When in caretaker status, maintenance is minimal and intended primarily to ensure security, health, and safety and to avoid physical deterioration. Caretaker Status would also include continuation of planned remediation activities if required, and adherence to the terms of the Programmatic Agreement (PA) for the protection of historic buildings and structures.

Under the Traditional Disposal alternative, the Army would transfer or dispose of property using a range of traditional disposal mechanisms. The deed of transfer would include a provision reserving the Army's right to conduct remediation activities and the regulators' right of access. Reuse of the WRAMC surplus property by others is a secondary action resulting from disposal. The reuse planning process is dynamic and often dependent on market and general economic conditions beyond the control of the reuse planning authority. Therefore, given the uncertainty associated with how redevelopment may progress over the next two decades, it is important to consider a range of potential future outcomes to bound the analysis of reuse. To that end, three separate levels of development intensity based on the WRLRA Reuse Plan are analyzed, including a Lower Bracket, Middle Bracket, and Upper Bracket of the Reuse Plan. The Middle Bracket is consistent with the long-term build-out plan as described in the WRLRA Reuse Plan. The Lower Bracket represents approximately half the expected development intensity, while the Upper Bracket represents a 25 percent increase in expected development intensity above the proposed Reuse Plan. The Lower and Upper Brackets are intended to bound the reasonable long-term redevelopment of WRAMC as foreseen in the Reuse Plan.

Factors Considered in Determining that No Environmental Impact Statement (EIS) is Required

The numerous factors considered in determining that no EIS is required are provided in detail in the EA, which is incorporated by reference into this Finding of No Significant Impact (FNSI). The EA examined potential effects of the proposed action and alternatives on resource areas of environmental and socioeconomic concern including land use, aesthetics and visual resources, air quality, noise, geology and soils, water resources, biological resources, cultural resources, socioeconomics, transportation, utilities, and hazardous and toxic substances.

In general, implementation of the disposal and reuse actions would potentially result in minor adverse effects to all resource areas evaluated. Moderate adverse impacts would occur to aesthetic and visual resources, noise, cultural resources, and transportation. For the above disposal and reuse alternatives, the EA recommends measures that will mitigate adverse effects. Anticipated use of sustainable design features (green construction), landscape planning, and Low Impact Development measures on-site by

future owners of the surplus property would further reduce adverse environmental effects for some resource categories and provide a degree of beneficial cumulative effects to the surrounding community.

Mitigation Measures.

Mitigation measures are required to reduce impacts to cultural resources and transportation below levels of significance.

Army Mitigation Obligations.

The Army in consultation with the DC SHPO and other consulting parties determined that the proposed action (closure, disposal, and reuse) would have adverse effects on WRAMC historic properties and entered into a PA which identifies specific measures to avoid, minimize or mitigate these adverse effects. The consulting parties agreed that adverse effects on historic properties would not be significant, provided that the mitigation measures in the PA (EA, Appendix B) are implemented as part of the proposed action. These mitigation measures are summarized below.

The PA requires the Army to comply with notification, reporting, and consulting requirements and (subject to availability of funding) to accomplish the following:

- i. Maintain historic properties. Keep buildings weather-tight, maintain air circulation and ventilation, set thermostats from 55 F to 85 F, conduct daily inspections, and repair damage to character-defining features. Provide pest control, physical security, and fire protection.
- ii. Identify Archaeological Resources. Use consultants meeting Department of Interior standards and follow DC SHPO Guidelines for conducting archaeological investigations.

Phase IA Archaeological Assessment - Archival Investigation. Identify locations where prehistoric or Civil War artifacts have been found and recommend areas with sufficient soil integrity for a geoarchaeological soil assessment.

Geoarchaeological Soil Assessment. Identify locations with intact soil deposits or paleosoils that may contain archaeological resources, using methodologies such as backhoe trenching, power or hand augers, or shovel tests. Recommend areas for Phase I archaeological testing.

Phase IB Archaeological Testing. Determine whether intact archaeological strata and remains are present, using appropriate test excavation techniques such as shovel tests, 1x1 meter units, and backhoe trenching. Recommend areas for Phase II archaeological evaluation.

Phase II Archaeological Evaluation Survey. Conduct Phase II Survey, if features or intact cultural soil horizons are present. Consult with SHPO on testing strategy to be used. Treat sites that retain integrity as historic properties eligible for listing in the National Register.

- iii. Nominate historic properties for listing in the National Register of Historic Places (NRHP) and the DC Inventory of Historic Sites.
- iv. Assess the effects of the WRLRA Reuse Plan on historic properties. Recommend measures to avoid, minimize or mitigate any adverse effects.
- v. Avoid damage to historic properties when removing non-character-defining features (plaques, memorials, time capsules, artwork, and signage). Repair any damage that occurs.
- vi. Document the WRAMC landscape with up to 100 large-format, black-and-white photos. Comply with National Park Service's "Heritage Documentation Programs HABS/HAER/HALS Photography Standards" (November 2011). Distribute prints, negatives, and digital scans.
- vii. Create a self-guided walking tour for areas of WRAMC that will be open to the public after

transfer. Install interpretive panels meeting the standards of the DC Heritage Trails program.

- viii. Document the existing condition of historic properties. Photograph all principal façades and select copies of as-built drawings, following National Register Bulletin 39: How to Improve the Quality of Photographs for National Register Nomination Bulletin.
- ix. Maintain a website with consultation documents and information on obtaining mitigation.
- x. Solicit input from the consulting parties during the CERCLA decision making process for environmental remedial actions that may affect historic properties.
- xi. Stop work if historic properties are discovered during ground disturbing activities; comply with 36 C.F.R. § 800.13(b)(3); and notify the SHPO. If Native American human remains, associated or unassociated funerary objects, sacred objects or objects of cultural patrimony are identified, comply with the Native American Graves Protection and Repatriation Act.

Other than adherence to the mitigation terms specified in the PA for the protection of cultural resources, no additional mitigation is required of the Army to reduce or avoid effects of the proposed action or any of the alternatives below levels of significance.

District of Columbia Mitigation Obligations.

Transportation. The District of Columbia would have overall responsibility for developing and implementing mitigation measures to reduce traffic impacts following property transfer and during redevelopment over the next two decades. The District of Columbia has initiated a comprehensive transportation planning process, which includes public participation and other NEPA processes, to identify transportation impacts of the WRLRA Reuse Plan and to mitigate these impacts below significance levels by identifying, funding, requiring and/or implementing transportation infrastructure improvements to highways, mass transportation, and bicycle and pedestrian ways. The EA assumes that further planning studies, project-specific TIS, and corrective measures (intersection mitigation and transit options such as bus and rail, streetcar, and improvements for bicycle and pedestrian travel) would be implemented over time with coordination and oversight by DDOT, as outlined in the 2012 TIS and the Reuse Plan (WRLRA 2012 a,b). Recommended transportation mitigation measures initially developed in the 2012 TIS are summarized in Table 1.

Historic Properties. The District of Columbia would be responsible for listing WRAMC historic properties on the DC Inventory of Historic Sites and conducting an historic preservation review on applications for subdivisions, demolition, new construction, additions, alterations, or repairs on the WRAMC property as part of the permitting process pursuant to the DC Historic Landmark and Historic District Protection Act of 1978 (DC Law 2-144).

Public Comment

All interested parties were invited to review and comment on this FNSI within 30 days of publication of the Notice of Availability in the Washington Times, which occurred on 1 May 2014. The end of the public comment period on the EA and Draft FNSI was 30 May 2014. Interested parties with comments or questions about this action, or who wanted to request a copy of the EA and Draft FNSI for review, were invited to contact Ms. Erin Mauer, PO Box 55413, Washington, DC 20040 or by email (erin.c.mauer.civ@mail.mil).

During the public comment period, the EA and Draft FNSI were available to the public via the Internet, at: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. Hard copies of the full EA with all appendices, along with the Draft FNSI, were also available in the following libraries: Juanita E. Thorton / Shepherd Park Library, 7420 Georgia Avenue, NW, Washington, DC 20012; Lamond-Riggs Library, 5401 South Dakota Avenue, NE, Washington, DC 20011; Petworth Library, 4200 Kansas Avenue, NW, Washington, DC 20011; and Takoma Park Library, 416 Cedar Street, NW, Washington, DC 20012. In addition, the EA and Draft FNSI were distributed to Federal and local agencies, and interested parties on the distribution list presented in Section 7 of the EA.

Table 1. Recommended Mitigation Measures for Impacted Intersections

Intersection Number	Recommended Mitigation Measures
3	<ul style="list-style-type: none"> • Constructing a 200-foot northbound right-turn lane. • Retiming the signal during the PM peak period.
4	<ul style="list-style-type: none"> • Constructing the Main Drive driveway as a separate left- and right-turn lane. • Retiming the signal during the PM peak period.
5	<ul style="list-style-type: none"> • Retiming the intersection during the peak period. • Addition of an all-red phase during the peak period. • Constructing a 150-foot westbound left-turn lane and a southbound right-turn lane extended from the existing bus lay-by.
6	<ul style="list-style-type: none"> • Removing the split phase and retiming the signal.
7	<ul style="list-style-type: none"> • Removing the split phase and retiming the signal.
12	<ul style="list-style-type: none"> • Removing 200-feet of on-street parking on Aspen Street for separate left-turn and through/right-turn lanes providing a 100-foot southbound right turn lane.
13	<ul style="list-style-type: none"> • Installing dedicated southbound and northbound 150 foot left turn bays by removing parking and tapering the through lanes towards the site. • Installing a 100-foot right turn storage lane along Main Drive.
14	<ul style="list-style-type: none"> • Installing dedicated southbound and northbound 150 foot left turn bays by removing parking and tapering the through lanes towards the site. • Installing a 100-foot right turn storage lane along Main Drive.
16-17	<ul style="list-style-type: none"> • Construction of a signal.
19	<ul style="list-style-type: none"> • Converting the intersection to all-way stop controlled.
20	<ul style="list-style-type: none"> • Retiming the signal during the AM peak period.
22	<ul style="list-style-type: none"> • Constructing a 250-foot northbound right-turn lane. • Retiming the signal during the PM peak period.
24	<ul style="list-style-type: none"> • Constructing a 50-foot right turn lane along the eastbound approach. • Retiming the intersection and adjusting the offsets during peak period.
28	<ul style="list-style-type: none"> • Retiming the signal during the PM peak period.
30	<ul style="list-style-type: none"> • Retiming the intersection and adjusting the offsets during the PM peak hour.
31	<ul style="list-style-type: none"> • Striping a 25-foot right turn lane along the northbound approach. • Retiming the intersection and adjusting the offsets during the peak period.
32	<ul style="list-style-type: none"> • Construction of a signal.
34	<ul style="list-style-type: none"> • Retiming the signal and adjusting the offsets during the peak period.
35	<ul style="list-style-type: none"> • Construction of a 100-foot northbound left-turn lane (remove existing on-street parking). • Retiming the intersection and adjusting the offsets during the peak period.
36	<ul style="list-style-type: none"> • Construction of a 50-foot northbound left-turn lane (remove existing on-street parking) and eastbound right-turn lane. • Retiming the intersection and adjusting the offsets during the peak period. • Retiming the intersection again in the total future scenario to include an eastbound protected/permitted left-turn.

During the 30-day comment period, which ended on 30 May 2014, three comment letters were received, including responses from the U.S. Environmental Protection Agency (EPA); the DC Office of the Deputy Mayor for Planning and Economic Development (ODMPED), which administers the WRLRA; and the District Department of Transportation (DDOT). The letters from ODMPED and DDOT raised no objections to the findings of the EA. ODMPED and DDOT indicated that the EA and Draft FNSI adequately addressed: 1) the effects and impacts of the proposed action, 2) integration and evaluation of the District's Reuse Plan, and 3) mitigation measures. Both ODMPED and DDOT offered minor corrections to the Final EA pertaining to updating certain references in the Final EA, but for which did not change the conclusions or findings of the EA. EPA did not identify any objections to the principal findings of the EA, but offered a number of minor comments. EPA comments mainly pertained to clarifying findings or providing more detailed information. Some of these issues are addressed in supporting studies cited in the EA or in another section of the EA document. EPA comments mainly related to the discussion of alternatives, water resources, hazardous and toxic substances, tree conservation, environmental justice, and cumulative effects. All of these comment letters were evaluated, and responses to the comments and concerns raised were prepared and included in the Administrative Record. None of these comment letters present significant new circumstances or information relevant to environmental concerns or bearing on the proposed action or its impact that would require additional analysis in the EA, in accordance with 32 CFR 651.5(g).

Conclusion

Based on the findings of the EA and after careful review of the potential impacts, I conclude that implementation of the proposed action or any of the alternatives would not result in a significant direct, indirect, or cumulative impact on the quality of the natural or human environment. Furthermore, beyond the required measures specified in the PA, no additional mitigation is required to reduce any environmental effects to below significant levels. Redevelopment of WRAMC surplus property would result in manageable adverse effects and beneficial effects related to the socioeconomic and environmental resource areas. Preparation of an EIS is not required, and preparation of a FNSI is appropriate.

I have also concluded that the no action alternative would not support Congressional requirements under the BRAC law (Public Laws 101-510 and 107-107); consequently, it has not been selected for implementation.

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DATE