

FINDING OF NO SIGNIFICANT IMPACT

BRAC 05 Closure of Fort Gillem, Georgia

Recommendations of the 2005 Defense Base Closure and Realignment Commission made in conformance with the provisions of the Defense Base Closure and Realignment Act of 1990 (Base Closure Act), Public Law 101-510, as amended, require the closure of Fort Gillem, Georgia. These recommendations also included the closure of the Army-Air Force Exchange System (AAFES) Atlanta Distribution Center and the establishment of a contiguous enclave for the Georgia Army National Guard, the remainder of the 81st Regional Readiness Command (RRC) units, the Criminal Investigation Division (CID) Forensics Laboratory, and the Navy Reserve Intelligence Area 14. The enclave will also be used by Southeast Regional Storage Management Office (SERSMO), which represents a discretionary move from another location on Fort Gillem to the newly established enclave.

The Army has prepared an environmental assessment (EA) to evaluate the environmental and socioeconomic impacts of the proposed action presented below. The EA has been developed in accordance with the National Environmental Policy Act of 1969 (NEPA) and implementing regulations issued by the Council on Environmental Quality (40 CFR 1500-1508), the Army (32 CFR Part 651), and the Office of the Secretary of Defense (Base Redevelopment and Realignment Manual - DoD 4165.66M).

Proposed Action

The proposed action is to dispose of approximately 1,189 acres of surplus property (primary action) made available by closure mandated by the Base Realignment and Closure (BRAC) Commission and subsequent reuse of installation land and infrastructure by others (secondary action). The Army would maintain an enclave of approximately 237 acres for continued military use of the existing site, consistent with the BRAC Commission's recommendation as discussed above, as well as discretionary movement of SERSMO to the enclave. The Atlanta Fraud Field Office (FO), the Southeastern FO, and the Military Entrance Processing Station remain in place within the enclave. Redevelopment of the Fort Gillem properties will be guided by the Forest Park/Fort Gillem Local Redevelopment Authority (FP/FGLRA) and their current Strategic Reuse Plan is located on the Web at: www.forestparkga.org.

Alternatives Considered

The no action alternative is included in the EA to identify the existing baseline conditions against which potential impacts were evaluated. For actions recommended by the BRAC Commission, it should be noted that for the no action alternative, continuation of current activities is not feasible, since the BRAC actions are required to be implemented by the BRAC legislation.

The first disposal alternative evaluated in the EA is the early transfer alternative. Under this alternative, the Army has available various property transfer and disposal methods that allow the reuse of the property to occur before environmental remedial action has been completed. The property must be suitable for the new owner's intended use, and that use must be consistent with protection of human health and the environment. The property could also be transferred to a new owner who agrees to perform all environmental remediation, waste management, and environmental compliance activities required for the property under federal and state requirements. Under the early transfer alternative, property transfer may also occur prior to the completion of the Army missions at Fort Gillem.

The traditional disposal alternative is another disposal alternative evaluated in the EA. Under this alternative, the Army would dispose of property once environmental remediation and other

environmental requirements are completed for individual parcels of the installation. Uncontaminated property is defined as areas where no release or disposal of hazardous substances or petroleum products has occurred, and where there has been no migration of these substances from adjacent areas. Such property would be available for transfer or disposal fairly quickly. For property on which hazardous substances are known to have been released or disposed of, necessary environmental remedial actions may take a long time to be selected, approved, and implemented. There may be a prolonged period under this traditional disposal alternative during which some parcels are not available for transfer or disposal.

The EA also evaluates a caretaker alternative. It represents a long-term maintenance period after closure if properties are not transferred as anticipated. Under caretaker status maintenance levels would be reduced consistent with federal government standards for excess and surplus properties. Under this alternative, the Army would continue remediation activities as with disposal alternatives.

Reuse of the Fort Gillem surplus properties by others is a secondary action resulting from disposal. Three reuse alternatives, a medium-low intensity reuse (MLIR) scenario, medium intensity reuse (MIR) scenario, and medium-high intensity reuse (MHIR) scenario are evaluated in the EA. The proposed level of intensity of reuse presented in the FP/FGLRA Strategic Reuse Plan (July 2007) is considered commensurate with the MIR scenario. The MLIR and MHIR scenarios were also evaluated in the EA to accurately capture or "bracket" the lower and higher ends of the potential reuse of the Fort Gillem properties.

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 no action alternative 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. Moderate adverse impacts would occur to land use, biological resources, cultural resources, transportation, and utilities. Regarding cultural resources, mitigation requirements and deed restrictions are specified in the Memorandum of Agreement (MOA) for compliance with Section 106 of the National Historic Preservation Act. Moderate beneficial effects are anticipated for socioeconomics and aesthetic and visual resources. Anticipated use of some sustainable design (green construction) features by future owners of Fort Gillem surplus property would reduce some adverse environmental effects and provide some beneficial cumulative effects to the surrounding community.

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 Clayton Daily News and Atlanta Journal-Constitution, which occurred on October 29, 2010. The end of the public comment period on the EA and Draft FNSI was November 29, 2010. 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 Mr. Larry Gissentanna, BRAC Environmental Office, 2053 North D Avenue, Building 400, Fort Gillem, Georgia 30297-5161 or by email (larry.gissentanna@us.army.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: Forest Park Branch Library, 696 Main Street, Forest Park, Georgia 30297; and Morrow Branch Library, 6225 Maddox Road, Morrow, Georgia 30260. In addition, the EA and Draft FNSI were distributed to Federal, state, and local agencies and interested parties on the distribution list presented in Section 7 of the EA.

During the 30-day comment period, which ended on November 29, 2010, three comment letters were received, including responses from the U.S. Environmental Protection Agency (EPA); the Georgia Department of Natural Resources, Environmental Protection Division (EPD); and the United Keetoowah Band of Cherokee Indians in Oklahoma. After the public comment period, an additional letter was received from the Seminole Tribe of Florida. The letters from the tribes raised no objections to the findings of the EA, but indicated that construction activities should cease and consultation commence if potentially relevant cultural resources are discovered in the future. EPA did not identify any objections to the findings of the EA. EPA concurred with the use of intensity based reuse scenarios for analyzing impacts in the EA, as well as the intensity of reuse analyzed in the EA. EPA did express concerns regarding the following: the need for sufficient guarantees to ensure that response actions are completed following transfer, future lake management of Lake Marchman, and the status of investigations at the southeastern area dump site. These issues have been considered and a response to these comments has been prepared as part of the Administrative Record. Comments in the letter submitted by EPD principally pertained to remaining contamination issues at Fort Gillem, including: proper delineation and characterization of remaining hazards; status and plans for future investigations and remediation; and the need for appropriate land use controls, regulatory concurrence, and deed restrictions prior to transfer. These issues are being resolved prior to land disposal and transfer, as appropriate, and subsequent to completion of the EA. 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 mitigation specified in the MOA, no additional mitigation measures are required to reduce any environmental effects to below significant levels. Redevelopment of Fort Gillem property would result in manageable adverse effects and beneficial effects related to the socioeconomics and environment 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.

Date: 1 February 2011



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