

## FINDING OF NO SIGNIFICANT IMPACT

### BRAC 05 Closure of Kansas Army Ammunition Plant, Kansas

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 Kansas Army Ammunition Plant (KSAAP), Kansas, in conjunction with the relocation of military missions to other installations.

The Army has prepared an environmental assessment (EA) to evaluate the environmental and socioeconomic impacts of the proposed action outlined 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 (Army primary action) is to dispose of the surplus federal property generated by the BRAC-mandated closure of KSAAP. Reuse of KSAAP surplus properties by others is a secondary action resulting from disposal. KSAAP consists of 13,727 acres of land located approximately 2 miles east of the town of Parsons in Labette County, in southeastern Kansas. The Army utilized the *KSAAP Comprehensive Master Redevelopment Plan* developed by the KSAAP Local Redevelopment Planning Authority (LRPA) and finalized in August 2007, as the primary source for developing reuse scenarios considered in the EA.

#### 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 directed 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 the early transfer alternative, property transfer occurs prior to the completion of environmental cleanup. 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, provided that the property must be suitable for the new owner's intended use. Typically, the Army performs the environmental cleanup. 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. . A combined approach is also possible.

The traditional disposal alternative is another disposal alternative evaluated in the EA. Under this alternative, the Army transfers or disposes of property once environmental remediation is completed for the transfer of individual parcels of the installation. Uncontaminated property is defined as areas where no release or disposal of hazardous substances or petroleum products has occurred, including 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 prolonged period after closure if properties are not transferred as anticipated. Under caretaker status there would be reduced maintenance to levels consistent with federal government standards for surplus properties. Under this alternative, the Army would continue remediation activities as with other disposal alternatives.

Two reuse alternatives, a low intensity reuse (LIR) scenario and a medium-low intensity reuse (MLIR) scenario are evaluated in the EA. The proposed level of intensity of reuse presented in the KSAAP LRPA Reuse Plan (August 2007) is considered commensurate with the LIR scenario. The MLIR scenario was also evaluated in the EA to accurately capture or "bracket" the higher end of the reasonably foreseeable reuse of KSAAP properties.

### **Factors Considered in Determining that No Environmental Impact Statement is Required**

The EA, which is incorporated by reference into this Finding of No Significant Impact (FNSI), examined potential effects of the proposed action and no action 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. Moderate adverse impacts would also occur to land use, air quality, noise, biological resources, cultural resources, and utilities. Regarding cultural resources, coordination with Kansas's State Historic Preservation Officer and the tribes is being carried out, and compliance with Section 106 of the National Historic Preservation Act will be satisfied before demolition, construction, or other significant modification is allowed to begin at any location determined to be of any significance. Moderate beneficial effects are also anticipated for socioeconomics.

### **Conclusion**

Based on the findings of the EA and careful review of the potential impacts, as well as consideration of comments received during the 30-day comment period on the EA and Draft FNSI, 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, no mitigation measures are required to reduce any environmental effects to below significant levels. Redevelopment of KSAAP property would result in manageable adverse effects and beneficial effects related to the socioeconomics and environment resource areas. Preparation of an Environmental Impact Statement is not required, and preparation of this 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.

## Public Comment

The public and all interested parties were invited to review and comment on the EA and FNSI within 30 days of publication of the Notice of Availability in the *Parsons Sun*. Comments were directed to Mr. Donald D. Dailey, Commander's Representative, Kansas Army Ammunition Plant via regular mail or e-mail. The EA and Draft FNSI were also available for review on the Web at [http://www.hqda.army.mil/acsimweb/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsimweb/brac/env_ea_review.htm). In addition, the EA and Draft FNSI were available for review at the following libraries:

State Library of Kansas  
Capitol Building, Room 343-N  
300 SW 10<sup>th</sup> Avenue  
Topeka, KS 66612-1593

Parsons Public Library  
311 S. 17<sup>th</sup> Street  
Parsons, KS 67357

After the 30-day comment period, which ended on October 6, 2008, only three comment letters were received, including responses from U.S. Fish and Wildlife Service, Kansas State Historical Society, and Kansas Department of Wildlife and Parks. These comment letters were evaluated and responses to the comments and concerns raised in these letters were prepared as an addendum to the EA and included in the Administrative Record. Based on these comments, the Army has provided copies of these letters to the KSAAP LRPA and Day & Zimmermann, Inc. (DZI) as they principally pertain to re-use of KSAAP.

Date:

4 Nov 08

Donald D. Dailey

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Commander's Representative, KSAAP