

FINDING OF NO SIGNIFICANT IMPACT

BRAC 05 REALIGNMENT AT LETTERKENNY ARMY DEPOT, PENNSYLVANIA

On May 13, 2005, the Secretary of Defense recommended that certain realignment actions occur at Letterkenny Army Depot (LEAD), Chambersburg, Pennsylvania. After review of the Secretary of Defense's recommendations, the Defense Base Closure and Realignment Commission ("BRAC Commission") submitted its final recommendations to the President on September 8, 2005. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The US Army Corps of Engineers, Mobile District, has prepared an Environmental Assessment (EA) which identifies, documents, and evaluates environmental effects of the BRAC Commission's recommended realignment of LEAD in Franklin County, Pennsylvania. The EA has been developed in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and implementing regulations issued by the President's Council on Environmental Quality (CEQ)¹. The 2006 Base Realignment Closure Manual for Compliance with the National Environmental Policy Act was used for guidance in preparing the EA. The purpose of the EA is to inform decision makers and the public of the likely environmental consequences of the proposed action and alternatives.

1.0 PROPOSED ACTION

The proposed action is to implement the BRAC Commission's recommendation, as mandated by BRAC law, Public Law 101-510, by constructing new facilities to accommodate the personnel and functions of organizations realigning and relocating to LEAD. The following highlights the BRAC Commission recommendations for LEAD, which are included as part of BRAC law, as quoted²:

- Realign Red River Army Depot. Relocate the depot maintenance of Tactical Missiles to Letterkenny Army Depot, PA.
- Realign Marine Corp Logistics Base Barstow, CA. Consolidate depot maintenance of Tactical Missiles at Letterkenny Army Depot, PA.
- Realign Rock Island Arsenal, IL, by relocating the depot maintenance of Combat Vehicles and Other to Anniston Army Depot, AL, and the depot maintenance of Other Equipment and Tactical Vehicles to Letterkenny Army Depot, PA.

To implement these recommendations, the following new facilities are proposed for construction:

Theater Readiness Monitoring Facility - Certification for Theater Readiness of PATRIOT and HAWK missiles is currently performed at Red River Army Depot, Texas. The decision by the Department of Defense (DOD) to close Red River munitions operations and relocate missile certification to LEAD requires the construction of a Theater Readiness Monitoring Facility (TRMF). There are no existing facilities within the Ammunition Area that have all the capabilities required to accomplish this mission, nor are there facilities that can be converted from existing uses and modified to meet this requirement. Square footage (SF) of the TRMF is identified on existing DD1391 as 40,000 SF but has been further

¹ Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, 40 Code of Federal Regulations (CFR) Parts 1500-1508, and Environmental Analysis of Army Actions, 32 CFR Part 651.

² Defense Base Closure and Realignment Commission, 8 September 2005. *Final Report to the President*.

refined to approximately 35,000 SF. Facility includes substantial dividing walls, can and decan areas, loading dock, test bays, operation bays, Electromagnetic Radio Frequency (RF) shielding, grounding, raised floor areas, controlled humidity, clean room, administrative area, break room, rest room, explosion proof lighting, cold storage area, inert gas lines, cranes, storage areas, CARC paint area, fire protection to include alarm, sprinkler system, fire pump, intrusion detection, emergency generator and building information systems. Supporting facilities include lightning protection, external security lighting, paved access road, 0.75-acre (~ 80 spaces) operational parking, and security fence.

Covered Missile Storage Facility - Construct a 2,000 SF storage facility for Tactical Missiles. Storage of missiles to be worked through the TRMF require quantity-distance compliant storage that may not be available in existing earth-covered magazines depending on the conventional storage requirements imposed upon LEMC. This project is needed to ensure that adequate storage space for the new mission is available.

Hazardous Materials Storage Facility - Construction of a 2,000 SF new covered hazardous materials storage pad is required to classify, store, and hold for disposal hazardous materials that will be generated by the transferred mission. These materials include lubricants, cleaning agents, and other liquids along with solid wastes generated by small-scale blasting and painting operations.

Health Clinic Addition - Construction of a 690-square-foot addition to building 332, the existing Health Clinic (located adjacent to Building 331), is required to accommodate increased BRAC staffing and provide storage area for additional employee health records. The increase in staff and records volume is necessary to provide health services to the additional personnel associated with the new missions.

2.0 ALTERNATIVES CONSIDERED

Under the no action alternative, LEAD would not implement the proposed action. Although the President's Council on Environmental Quality (CEQ) regulations require consideration of the no action alternative, implementation of the no action alternative is not viable under BRAC law. Therefore, the no action alternative was included in the analysis to serve as a baseline for comparison.

The Army considered and analyzed one other alternative, the realignment, or "preferred," alternative. Under the preferred alternative, all projects will be constructed as described in the proposed action, adding approximately 40,000 SF of built space. Siting of these projects will be consistent with the existing land use at LEAD. Three projects, the TRMF, Covered Missile Storage Facility, and Hazardous Materials Storage Facility are collocated and would be located within the Ammunition Storage Area. The Health Clinic addition would be added to building 332, the existing Health Clinic, which is located in the Cantonment Area.

Other alternatives were considered, but not analyzed. These included (1) use of existing facilities at LEAD; (2) leasing existing space off-post; use of other DOD installations; and (3) new construction in locations other than those identified in the preferred alternative. These other alternatives were considered not feasible to implement the proposed action and were therefore dismissed from further analysis.

3.0 FACTORS CONSIDERED IN DETERMINING THAT ENVIRONMENTAL IMPACT STATEMENT IS NOT REQUIRED

The Environmental Assessment (EA), which is incorporated by reference into this Finding of No Significant Impact (FNSI), examined potential effects of the proposed action and no action alternative on 13 resource areas of environmental and socioeconomic concern: land use, aesthetic and visual resources, air quality, noise, geology and soils, water resources, biological resources, cultural resources, socioeconomics (including environmental justice and protection of children), transportation, utilities, hazardous and toxic substances, and human health and safety.

Implementation of the proposed realignment actions would not have any significant adverse effects or impacts on any of the environmental or related resource areas at LEAD or to areas surrounding the installation. Since none of the predicted effects of the proposed realignment actions would result in significant impacts, mitigation is not needed. Known potential effects resulting from implementing the proposed action on the physical and natural environment will not be significant. Therefore, implementation of the proposed action will not require the preparation of an Environmental Impact Statement. Preparation of a FNSI is appropriate.

4.0 CONCLUSION

Based on the EA, it has been determined that implementation of the proposed action will have no significant direct, indirect, or cumulative adverse effects on the quality of the natural or human environment. Because no significant environmental impacts will result from implementation of the proposed action, an Environmental Impact Statement is not required and will not be prepared.

5.0 PUBLIC COMMENT

Interested parties were invited to review and comment on the EA and Draft FNSI from May 14, 2007 to June 13, 2007. The only comments received were from the United States Environmental Protection Agency, Region III. The main points were:

- The US Fish and Wildlife Service (USFWS) determination for effects on Threatened and Endangered Species is valid for two years from the date of the consultation. The USFWS determination may expire before the BRAC-related projects are complete, by September 15, 2011. Thus, attention to this timeframe should be noted as well as possibility of contacting USFWS for an additional review, if needed.
- Identify Best Management Practices (BMPs) that would be implemented to mitigate impacts to vegetation.
- Suggest that the Army conduct radon testing after the construction to determine the presence of radon and remediation, if necessary.
- EPA recommends LEAD to implement the President's Executive Order 13423: Strengthening Federal Environment, Energy and Transportation Management by incorporating energy efficiency when planning the construction phase of this project.
- Several new projects at LEAD may occur simultaneously with construction activities for the Proposed Action, as outlined in the 2006 LEAD Requirement Analysis. Please note the NEPA documentation status of these projects.

LEAD will conduct additional review with the USFWS, if the proposed project has not been fully implemented prior to the expiration of the determination for effects on Threatened and Endangered Species.

Since there are no significant impacts, mitigation is not necessary; however, to further minimize any minor impacts to vegetation BMPs may be implemented, such as re-establish native trees and shrubs on disturbed areas; re-seed open areas with native grasses and other vegetation; and preserve large, mast-producing trees to the greatest extent practicable.

LEAD will install radon detector units to ascertain background radon levels after proposed projects are complete.

Relevant Executive Orders (EOs) that the Army will adhere to, including EO 13423, are stated in Section 1.6.2 *Relevant Statutes and EOs* of the EA. In addition, the new facilities will be designed to Leadership in Energy and Environmental Design (LEED) SILVER level of rating.

NEPA documentation for projects identified in the 2006 LEAD Requirement Analysis, as well as any future projects, will be conducted as funding and projects are implemented.

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