

**FINAL**

**ENVIRONMENTAL ASSESSMENT  
FOR BRAC 05 CLOSURE AND  
DISPOSAL AND REUSE OF THE  
1LT RAY S. MUSSELMAN MEMORIAL  
UNITED STATES ARMY RESERVE CENTER  
NORRISTOWN, PENNSYLVANIA**



**Prepared for:**

**U.S. Army Reserve 99th Regional Support Command**

**Prepared by:**

**U.S. Army Corps of Engineers, Mobile District  
P.O. Box 2288  
Mobile, Alabama 36628**

**With technical assistance from:**

**AGEISS Inc.  
1202 Bergen Parkway, Suite 310  
Evergreen, Colorado 80439**

**May 2012**

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**FINDING OF NO SIGNIFICANT IMPACT (FNSI) FOR  
BRAC 05 CLOSURE AND DISPOSAL AND REUSE OF  
1LT RAY S. MUSSELMAN MEMORIAL UNITED STATES ARMY RESERVE CENTER  
NORRISTOWN, PENNSYLVANIA**

Pursuant to the Council on Environmental Quality (CEQ) regulations (40 CFR 1400-1508) for implementing the procedural provisions of the *National Environmental Policy Act* of 1969 (NEPA) (42 U.S.C. 4321 et. seq.) and the U.S. Department of Army Regulation 32 CFR 651 (*Environmental Analysis of Army Actions*; Final Rule), as well as policy and guidance provided by the *Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act*, the U.S. Army conducted an environmental assessment (EA) of potential environmental effects from the closure, disposal, and reuse associated with implementation of Base Closure and Realignment (BRAC) actions.

**Purpose and Need.** On September 8, 2005, the BRAC Commission recommended closure of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (Musselman USARC) and realignment of essential missions to other installations. The deactivated Musselman USARC property is excess to Army military need and will be disposed of according to applicable laws and regulations. Pursuant to NEPA and its implementing regulations, the Army has prepared this EA to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.

**Description of the Proposed Action.** The Proposed Action is the disposal of surplus property made available by the realignment of the Musselman USARC. Redevelopment and reuse of the surplus Musselman USARC property (the "Property") would occur as a secondary action under disposal. Under BRAC law, the Army closed the Musselman USARC prior to September 15, 2011.

**Alternatives Considered.** Three alternatives are evaluated in this EA.

*Preferred Alternative.* For the Preferred Alternative (Traditional Disposal and Reuse), in accordance with the Local Redevelopment Authority (LRA) reuse plan, the Army proposes to assign the Property to the U.S. Department of Education for a public benefit conveyance of the entire parcel to the Norristown Area School District (NASD) for reuse as an elementary school.

*Caretaker Status Alternative.* The Army in consultation with the LRA determines the initial maintenance levels for the closed Musselman USARC and their duration on a facility-by-facility basis. At a minimum these levels ensure weather tightness for buildings, limit undue facility deterioration, and provide physical security. At the end of the initial maintenance period the Army normally reduces its maintenance to the minimum level for surplus government property as required by 41 CFR Parts 102-75.945 and 102-75.965 and Army Regulation 420-1 (Army Facilities Management).

*No Action Alternative.* Under the No Action Alternative, the Army would continue operations at the Musselman USARC at levels similar to those that occurred prior to the BRAC 2005 Commission's recommendations for closure. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves

as a benchmark against which the environmental impacts of the action alternatives may be evaluated.

**Factors Considered in Determining that an Environmental Impact Statement is not Required.** No significant environmental impacts were identified in the EA (attached). Impacts were analyzed for 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 support of this EA, the U.S. Army completed a cultural resources assessment to determine if there were any resources that could be affected as a result of implementation of the Proposed Action.

Implementation of the proposed disposal and reuse action would not have any significant adverse effects or impacts to any of the resource areas at Musselman USARC or on areas surrounding the Property. The U.S. Fish and Wildlife Service, the Pennsylvania Department of Conservation and Natural Resources, the Pennsylvania Fish and Boat Commission, the Pennsylvania Game Commission, and the Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation concur with this conclusion. No mitigation is needed.

The Property would be transferred with an asbestos covenant and a lead-based paint covenant that will require the transferee manage and if necessary remove asbestos and lead-based paint as required by applicable laws.

**Conclusion.** Based on the environmental impact analyses described in the EA, which is hereby incorporated into this FNSI, it has been determined that implementation of the Proposed Action or any alternative would not have a significant impact on the quality of the natural or the human environment. Because no significant environmental impact would result from implementation of the Proposed Action or alternatives, an environmental impact statement is not required and will not be prepared.

**Public Comment.** A Notice of Availability (NOA) was published in a local newspaper, *The Times Herald* and a regional newspaper, *The Philadelphia Inquirer* on April 5, 6, and 7, 2012 announcing the beginning of a 30-day public review period. In the NOA, interested parties were invited to review and comment on the EA and draft FNSI, and were informed that the EA and draft FNSI were available at the Montgomery County - Norristown Public Library, 1001 Powell Street, Norristown, PA 19401 and on the BRAC website at [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm). One email was received from The Delaware Nation requesting a copy of the EA. No comments were received.

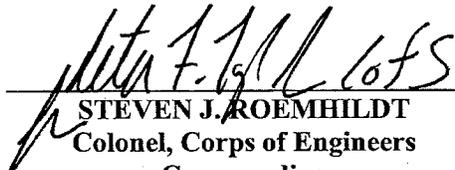
Date: 11 May 12

  
JOSE E. CEPEDA  
COL, EN  
DPW Regional Engineer

**ENVIRONMENTAL ASSESSMENT  
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1LT RAY S. MUSSELMAN MEMORIAL  
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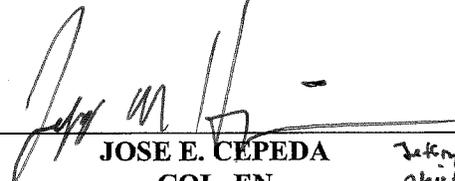
*Prepared by:*

**U.S. ARMY CORPS OF ENGINEERS  
MOBILE DISTRICT**

  
\_\_\_\_\_  
**STEVEN J. ROEMHILDT**  
Colonel, Corps of Engineers  
Commanding

*Approved by:*

**99th REGIONAL SUPPORT COMMAND**

  
\_\_\_\_\_  
**JOSE E. CEPEDA**  
COL, EN  
DPW Regional Engineer

*Acting in Honor of  
Chief, EAW Division  
99th ESC*

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## ENVIRONMENTAL ASSESSMENT

**LEAD AGENCY:** U.S. Army Reserve, 99<sup>th</sup> Regional Support Command

**TITLE OF PROPOSED ACTION:** Closure and Disposal and Reuse of the 1LT Ray S. Musselman Memorial U.S. Army Reserve Center, Norristown, Pennsylvania

**AFFECTED JURISDICTIONS:** Norristown, Montgomery County, Pennsylvania

**PREPARED BY:** U.S. Army Corps of Engineers, Mobile District, Commanding

**TECHNICAL ASSISTANCE FROM:** AGEISS Inc.

**APPROVED BY:** Jose E. Cepeda, COL, EN, DPW Regional Engineer

**ABSTRACT:** The U.S. Army Corps of Engineers prepared an environmental assessment (EA) on behalf of the U.S. Army Reserve 99<sup>th</sup> Regional Support Command (RSC) for the proposed closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial U.S. Army Reserve Center in Norristown, Pennsylvania as part of the restructuring of military bases through the Defense Base Closure and Realignment Act. This EA addresses the potential environmental, socioeconomic, and cultural impacts of this proposed action and its alternatives.

Based on the environmental impact analyses described in this EA it has been determined that implementation of the Proposed Action would not have a significant impact on the quality of the natural or the human environment. Because no significant environmental impact would result from implementation of the Proposed Action, an environmental impact statement is not required and a Finding of No Significant Impact (FNSI) will be published in accordance with the *National Environmental Policy Act* of 1969.

**REVIEW PERIOD:** A Notice of Availability (NOA) was published in *The Times Herald* and *The Philadelphia Inquirer*, on April 5, 6, and 7, 2012, announcing the beginning of a 30-day public review period. In the NOA, interested parties were invited to review and comment on the EA and draft FNSI, and were informed that the EA and draft FNSI were made available during the public review period at the Montgomery County - Norristown Public Library, 1001 Powell Street, Norristown, PA 19401 and on the BRAC website at [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm). Reviewers were invited to submit comments on the EA and draft FNSI during the 30-day public comment period via mail, fax, or e-mail to the following:

Ms. Amanda Murphy  
NEPA and Cultural Resources Specialist  
99<sup>th</sup> RSC, DPW, Environmental Division  
5231 South Scott Plaza  
Fort Dix, NJ 08640  
609-521-8047 (office)  
609-562-7983 (fax)  
Email: [amanda.w.murphy.ctr@us.army.mil](mailto:amanda.w.murphy.ctr@us.army.mil)

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## EXECUTIVE SUMMARY

### ES.1 Introduction

This environmental assessment (EA) analyzes the potential environmental impacts associated with the U.S. Army's Proposed Action for closure, disposal, and reuse of the First Lieutenant (1LT) Ray S. Musselman Memorial (Musselman) United States Army Reserve Center (USARC), Norristown, Pennsylvania as directed by the Base Closure and Realignment (BRAC) Commission's recommendations.

This EA was developed in accordance with the *National Environmental Policy Act* of 1969 (NEPA) (42 U.S.C. § 4321 et seq.); implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

### ES.2 Purpose and Need

On September 8, 2005, the BRAC Commission recommended closure of the Musselman USARC and realignment of essential missions to other installations. The deactivated Musselman USARC property is excess to Army military need and will be disposed of according to applicable laws and regulations. Pursuant to NEPA and its implementing regulations, the Army has prepared this EA to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.

### ES.3 Setting

The Musselman USARC is located at 1020 Sandy Hill Road and is primarily in the Municipality of Norristown, Pennsylvania, with a small portion in the southeast corner of the property located in Plymouth Township, Pennsylvania. Norristown, the county seat of Montgomery County, is a 3.5-square-mile community located on the Schuylkill River, 6 miles northwest of Philadelphia.

### ES.4 Proposed Action

The Proposed Action is the disposal of surplus property made available by the realignment of the Musselman USARC. Redevelopment and reuse of the surplus USARC property (the "Property") would occur as a secondary action by a non-Federal Government entity.

Under BRAC law, the Army closed the Musselman USARC prior to September 15, 2011. The Army will dispose of the Property. As a part of the disposal process, the Army screened the Property for reuse with the U.S. Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this Property for another purpose.

### ES.5 Alternatives

Three alternatives were analyzed in this EA: the Preferred Alternative (Traditional Disposal and Reuse), the Caretaker Status Alternative, and the No Action Alternative.

**Preferred Alternative: Traditional Disposal and Reuse.** For the Preferred Alternative, the Army would assign the Property to the U.S. Department of Education for a public benefit conveyance of the entire parcel to the Norristown Area School District (NASD). The Property

would be used for an elementary school as recommended by the Local Redevelopment Authority (LRA) in its redevelopment plan.

**Caretaker Status Alternative.** The Army in consultation with the LRA determines the initial maintenance levels for the closed Musselman USARC and their duration on a facility-by-facility basis. At a minimum these levels ensure weather tightness for buildings, limit undue facility deterioration, and provide physical security. At the end of the initial maintenance period the Army normally reduces its maintenance to the minimum level for surplus government property as required by 41 CFR Parts 102-75.945 and 102-75.965 and Army Regulation 420-1 (Army Facilities Management).

**No Action Alternative.** Under the No Action Alternative, the Army would continue operations at the Musselman USARC at levels similar to those that occurred prior to the BRAC 2005 Commission's recommendations for closure. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated.

**Alternatives Considered and Eliminated from Further Analysis.** Because no cleanup actions are required, the Property is not a suitable candidate for early transfer, and this alternative was not carried forward for further analysis. Because the NASD submitted the only notice of interest and no other reuse alternatives were recommended by the LRA, no other alternatives are carried forward for further analysis in this EA.

## **ES.6 Environmental Consequences**

Initially, twelve resource areas were considered for potential impacts from the Preferred Alternative, the Caretaker Status Alternative, and the No Action Alternative. Army NEPA Regulations (32 CFR § 651.14) state the analysis should reduce or eliminate discussion of minor issues to help focus analyses. To minimize unnecessary analysis, and concentrate on those resource areas potentially affected by the Proposed Action, five resource areas were analyzed in detail in this EA, specifically: land use, air quality, socioeconomics, transportation, and hazardous and toxic substances.

**Preferred Alternative: Traditional Disposal and Reuse.** Under the Preferred Alternative, land use of the Musselman USARC would change from a military site to an elementary school. The Preferred Alternative is compatible with zoning, ordinances, community land use plans, and existing land uses in the vicinity of the Property and no significant impacts to land use would occur.

Although vehicle emissions from the planned reuse might be slightly greater than existing vehicle emissions, the increase would not cause significant impacts to air quality. Vehicle traffic from the proposed school would include up to six school buses to transport students to the facility on Monday through Friday at pre-determined times and approximately 14 to 18 staff vehicles, plus vehicles belonging to visitors. These vehicle numbers would be comparable, although slightly larger, than those for the five to seven full-time workers who currently travel to the Musselman USARC daily and the 35 to 40 persons who travel to the facility periodically for drill weekends. The proposed reuse would continue to require boilers as part of the heating and ventilation system, but the emissions from the boilers should not be significantly different than

those from existing usage. No significant impacts to air quality would occur. Because Montgomery County is assigned to Zone 1 (highest potential for radon) on the U.S. Environmental Protection Agency's (EPA's) Map of Radon Zones, the NASD should perform initial radon monitoring to verify that radon levels do not exceed the EPA's 4 picocuries per liter action level.

Based on the Economic Impact Forecast System analysis, no significant socioeconomic impacts would occur. Potential short-term economic benefits would be realized as a result of renovations and activity for the proposed reuse. These impacts would be in the form of additional employment, income, and business sales created but impacts would not be significant. No impacts to housing are anticipated. Development of the area as a school would provide a beneficial impact to education in the local area. No adverse potential impacts to minority or low-income populations or to children have been identified as a result of the proposed disposal and reuse activities.

An increase in traffic would occur, as described above; however, this increase would not disrupt current transportation patterns or cause significant impacts to transportation.

An Environmental Condition of Property Update Report categorized the Property as Type 2, which is defined as an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred. This classification was selected based on the detection of naphthalene and toluene in subsurface soil samples in the vicinity of the former underground storage tank. No adverse health impact is expected from petroleum constituents (naphthalene and toluene) that may remain in the subsurface soil; these were detected at estimated values below Pennsylvania Department of Environmental Protection regulatory standards for residential exposure scenarios.

A 1990 asbestos survey identified asbestos-containing materials (ACM) within the OMS and main buildings. Lead-based paint is potentially present in the buildings. A lead-based paint survey was not conducted on the Property, but all buildings were constructed before 1981. The Property would be transferred with an asbestos covenant and a lead-based paint covenant that will require the transferee manage and if necessary remove asbestos and lead-based paint as required by applicable laws. No polychlorinated biphenyls are present on the Property. Disposal and reuse of the Property by NASD for an elementary school would limit hazardous materials stored and used at the Property to common janitorial cleaning supplies, resulting in a direct long-term beneficial impact.

In the long term, there would be no significant impacts to land use, air quality, noise, geology and soils, water resources, biological resources, cultural resources, socioeconomics, transportation, utilities, or hazardous and toxic substances as a result of implementation of the Preferred Alternative. A long-term beneficial impact to aesthetics and visual resources could occur as a result of new landscaping.

**Caretaker Status Alternative.** Under the Caretaker Status Alternative, no significant impacts to land use, air quality, noise, geology and soils, water resources, biological resources, cultural resources, socioeconomics, transportation, utilities, or hazardous and toxic substances would occur. Land use would change from a functioning military installation to one under limited

maintenance in caretaker status. A decrease in the military presence at the Musselman USARC would result in decreased impacts to air quality and transportation as compared to existing conditions. However, because of the low magnitude of these existing impacts, no significant changes to the environment would occur. Changes to the existing socioeconomic baseline conditions would be insignificant as a result of operational closure with periodic maintenance and upkeep of the facility. Under this status, no hazardous and toxic substances related to vehicle maintenance would be stored on site and the quantity of hazardous and toxic substances related to facility maintenance activities would be comparable to existing conditions, resulting in no significant impacts to hazardous and toxic substances.

**No Action Alternative.** Under the No Action Alternative, the Army would continue to use the Musselman USARC. No changes to the existing environment would occur.

**Cumulative Impacts.** Cumulative effects are those environmental impacts that result from the incremental effects of other past, present, or reasonably foreseeable future actions when combined with the Proposed Action. The analysis identified three reasonably foreseeable actions. Potential cumulative impacts include short-term air quality, noise, socioeconomic, and transportation impacts. However, due to the distance from the Musselman USARC and the short duration of project activities, there would be no significant cumulative impacts.

#### **ES.7 Mitigation Responsibility**

No mitigation measures are required for the Preferred Alternative because resulting impacts would not meet significance criteria; that is, the impacts would not be significant.

#### **ES.8 Findings and Conclusions**

Direct, indirect, and cumulative impacts of the Preferred Alternative, the Caretaker Status Alternative, and the No Action Alternative have been considered. No significant impacts would occur. Therefore, the issuance of a Finding of No Significant Impact is warranted, and preparation of an environmental impact statement is not required.

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## LIST OF ACRONYMS

1LT	First Lieutenant
AADT	annual average daily traffic
ACAM	Air Conformity Application Model
ACM	asbestos containing material
BRAC	Base Realignment and Closure
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	<i>Code of Federal Regulations</i>
CO <sub>2e</sub>	Carbon Dioxide Equivalent
DoD	U.S. Department of Defense
EA	environmental assessment
ECP	Environmental Condition of Property
EIFS	Economic Impact Forecast System
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FNSI	Finding of No Significant Impact
GHG	greenhouse gas
GWP	Global Warming Potential
IT	information technology
LBP	lead-based paint
LRA	Local Redevelopment Authority
MEP	military equipment parking
Musselman USARC	1LT Ray S. Musselman Memorial United States Army Reserve Center
NAAQS	National Ambient Air Quality Standards
NASD	Norristown Area School District
NEPA	<i>National Environmental Policy Act</i>
NOA	Notice of Availability
OMS	Organizational Maintenance Shop
PADEP	Pennsylvania Department of Environmental Protection
PCB	polychlorinated biphenyl
PM <sub>10</sub>	particulate matter with an aerodynamic size less than or equal to 10 microns
PM <sub>2.5</sub>	particulate matter with an aerodynamic size less than or equal to 2.5 microns
ROI	region of influence
RONA	Record of Non-Applicability
RSC	Regional Support Command
RTV	rational threshold value
SEPTA	Southeastern Pennsylvania Transportation Authority
SHPO	State Historic Preservation Officer
USAR	U.S. Army Reserve
USARC	U.S. Army Reserve Center
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service

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## 1.0 INTRODUCTION

This environmental assessment (EA) analyzes the environmental impacts of the proposed closure, disposal, and reuse of the First Lieutenant (1LT) Ray S. Musselman Memorial (Musselman) United States Army Reserve Center (USARC), Norristown, Pennsylvania (Figure 1). This EA was developed in accordance with the *National Environmental Policy Act* of 1969 (NEPA) [42 United States Code (U.S.C.) § 4321 et seq.]; implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

### 1.1 Purpose and Need

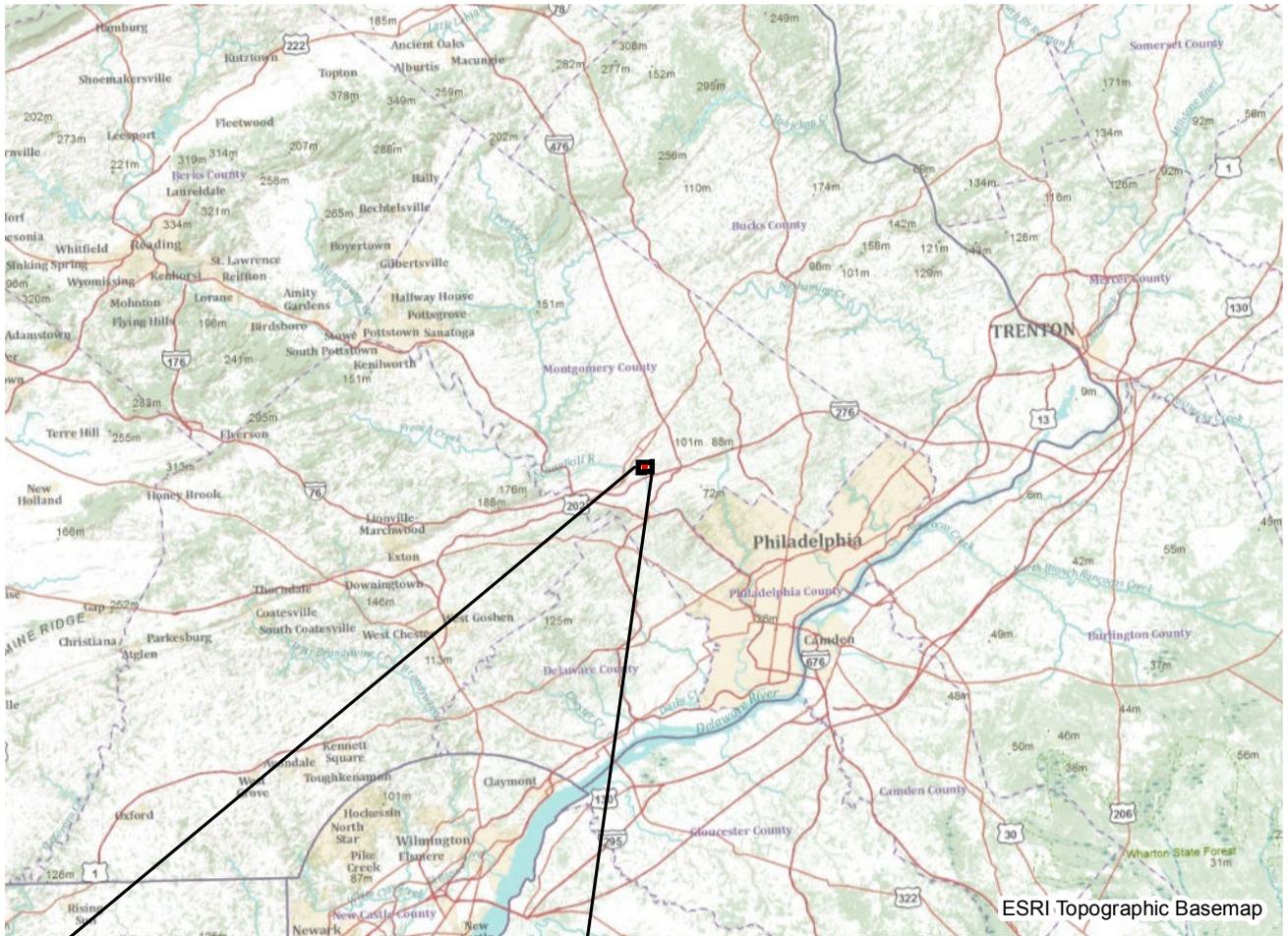
On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the Musselman USARC (Figure 2) and realignment of essential missions to other installations. The deactivated USARC property is excess to Army military need and will be disposed of according to applicable laws and regulations. Pursuant to NEPA and its implementing regulations, the Army has prepared this EA to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.

### 1.2 Public Involvement

The Army is committed to open decision-making. The collaborative involvement of other agencies, organizations, and individuals in the NEPA process enhances issue identification and problem solving. In preparing this EA, the Army consulted or coordinated with the Pennsylvania State Historic Preservation Officer (SHPO); U.S. Fish and Wildlife Service (USFWS); seven federally recognized Native American Tribes; Pennsylvania Department of Conservation and Natural Resources; Pennsylvania Fish and Boat Commission; Pennsylvania Game Commission; and the local historical society.

A Notice of Availability (NOA) was published in a local newspaper, *The Times Herald*, and a regional newspaper, *The Philadelphia Inquirer* on April 5, 6, and 7, 2012 announcing the beginning of a 30-day public review period. In the NOA, interested parties were informed that the EA and draft Finding of No Significant Impact (FNSI) were made available during the public review period at the Montgomery County – Norristown Public Library, 1001 Powell Street, Norristown, Pennsylvania 19401, and on the BRAC website at [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm). The Army invited the public and all interested and affected parties to review and comment on this EA and the draft FNSI and to submit comments and requests for information to the Environmental Coordinator of the U.S. Army Reserve (USAR) 99th Regional Support Command (RSC): Ms. Amanda Murphy, NEPA and Cultural Resources Specialist, 99th RSC, DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at [amanda.w.murphy.ctr@us.army.mil](mailto:amanda.w.murphy.ctr@us.army.mil).

One email was received. The Delaware Nation requested a copy of the EA. No comments were received. The impacts of the Proposed Action are not significant and the Army will execute the FNSI and the action can proceed immediately. The public may obtain information on the status and progress of the Proposed Action and the EA through the 99<sup>th</sup> RSC with the contact information provided above.



ESRI Topographic Basemap



ESRI OpenStreetMap

**Approximate Site Boundary**



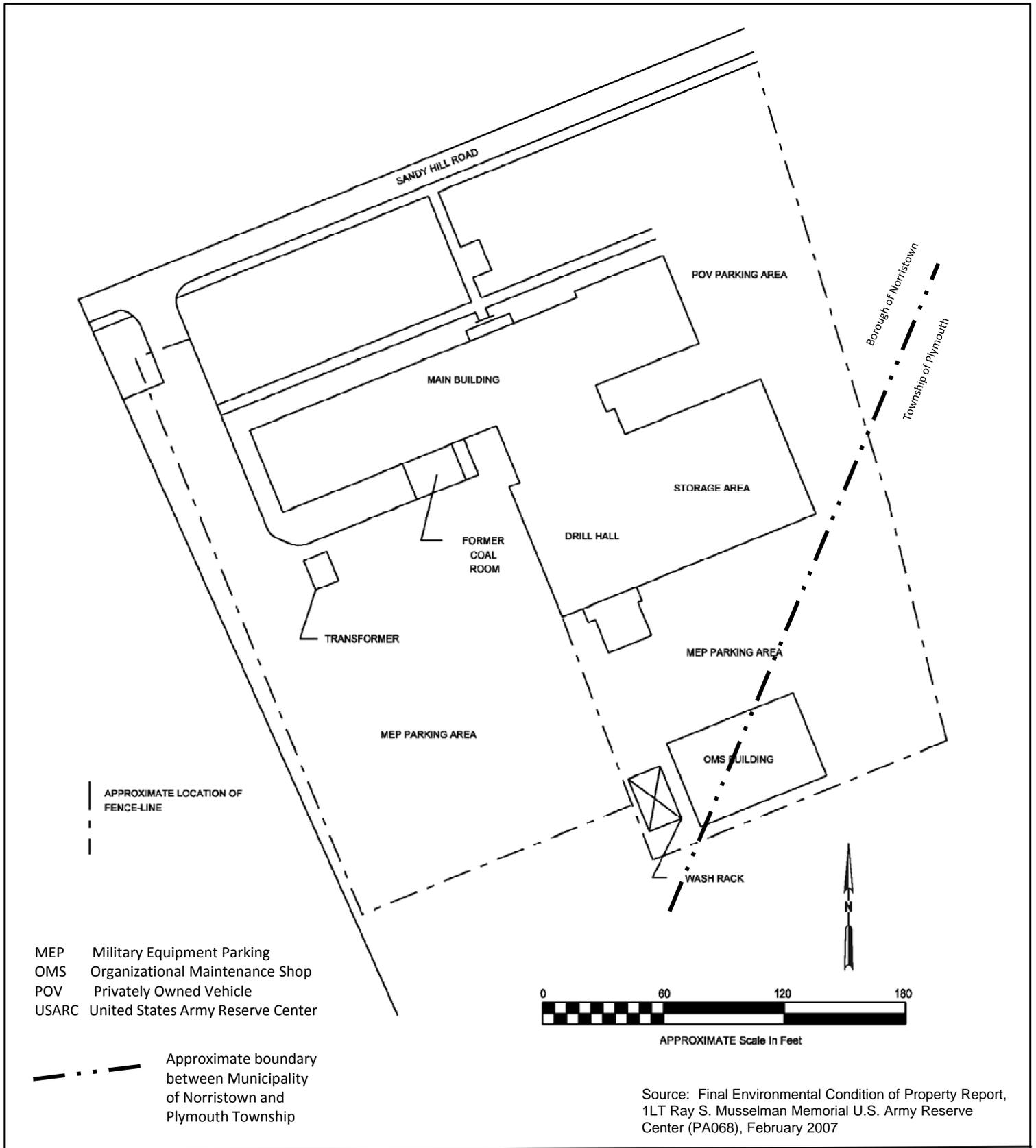
**Legend**

Musselman USARC Boundary

USARC United States Army Reserve Center

Prepared For:  
U.S. Army Corps of Engineers, Mobile District

Figure 1  
Musselman USARC, Norristown, PA, Location Map



Prepared For:

U.S. Army Corps of Engineers,  
 Mobile District

Figure 2

Site Plan for Musselman USARC, Norristown, PA

## 2.0 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is the disposal of surplus property made available by the realignment of Musselman USARC. Redevelopment and reuse of the surplus USARC property (the “Property”) would occur as a secondary action by a non-Federal Government entity.

Under BRAC law, the Army closed the Musselman USARC prior to September 15, 2011. The Army will dispose of the Property. As a part of the disposal process, the Army screened the Property for reuse with the U.S. Department of Defense (DoD) and other federal agencies. No federal agency expressed an interest in reusing this Property for another purpose.

### 2.1 BRAC Commission’s Recommendation

The BRAC Commission’s recommendation is to:

*“Close the Reese United States Army Reserve Center in Chester, PA, the United States Army Reserve Organizational Maintenance Shop in Chester, PA, the Germantown Veterans Memorial United States Army Reserve Center in Philadelphia, PA, the Horsham Memorial United States Army Reserve Center in Horsham, PA, the **1LT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, PA**, and the North Penn Memorial United States Army Reserve Center in Norristown, PA, and relocate units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove Joint Reserve Base, PA. The Army shall establish an enclave at Willow Grove Joint Reserve Base, PA, to retain essential facilities to support activities of the Reserve Components.” (DoD 2005)*

The environmental impacts resulting from the construction and operation of the new Armed Forces Reserve Center at Willow Grove Joint Reserve Base, PA were analyzed in the *BRAC EA for the Construction and Operation of an Armed Forces Reserve Center Willow Grove Naval Air Station Joint Reserve Base, Pennsylvania*, 2009.

### 2.2 Description of the Musselman USARC (the “Property”)

In 1955, the U.S. Government purchased 3.45 acres of land historically used for agricultural purposes, located at 1020 Sandy Hill Road, Norristown, Montgomery County, Pennsylvania, to construct an Army Reserve Center. Currently, the Property has two permanent structures:

- ◆ 35,496-square-foot main administration building
- ◆ 3,850-square-foot Organizational Maintenance Shop (OMS)



*ILT Ray S. Musselman United States Army Reserve Center*

Figure 2 shows the Musselman USARC site plan. The administration building and the OMS were constructed in late 1958 or early 1959 and renovated in 1994. Both structures are on concrete foundations and consist of concrete block walls covered with brick and stucco veneer. The main building is an irregular-shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor. The building's interior consists of office space, classrooms, kitchen area, storage, former indoor firing range, and a drill hall. A boiler room is located in the southern portion of the main building. The boiler room is lower in elevation than the first floor and houses the building's water heater, natural gas heating units, and bypass feeder. The second floor is above the entire northern half of the building. One pad-mounted transformer is located outside the southwestern corner of the main building (USACE Louisville 2007).



*Front Entrance of Administration Building*

The one-story OMS and wash rack area are located south of the main building. The wash rack is located outside, on the west side of the OMS building, and consists of a concrete pad that is even with the surrounding pavement (that is, no curb). The interior of the OMS consists of four vehicle maintenance bays, two offices, a restroom, electrical closet, and a storage room (USACE Louisville 2007).



*Organizational Maintenance Shop*

Two military equipment parking (MEP) areas and one privately owned vehicle parking area are also on the site. Chain-link security fencing topped with barbed wire encloses the MEP areas and OMS building. Most of the Property (approximately 3 acres) is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining land (0.4 acre) is grassed with trees along the eastern and southern portions of the Property (USACE Louisville 2007).

The site was most recently used by the 465th Transportation Company and a platoon-sized element of the 444th Human Resources Company. Five to seven personnel worked at the facility Monday through Friday. On drill weekends, 35 to 40 personnel were on site. Maximum occupancy has been around 60.

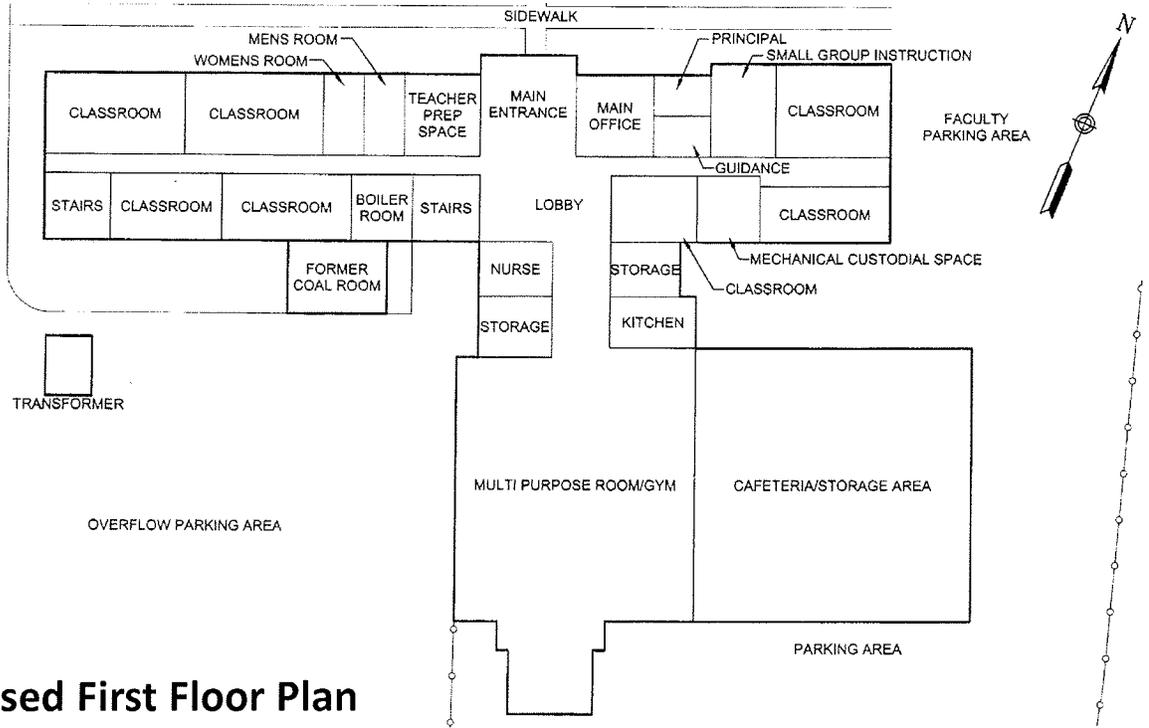
### **3.0 ALTERNATIVES**

#### **3.1 Preferred Alternative: Traditional Army Disposal and Reuse as a School by the Norristown Area School District**

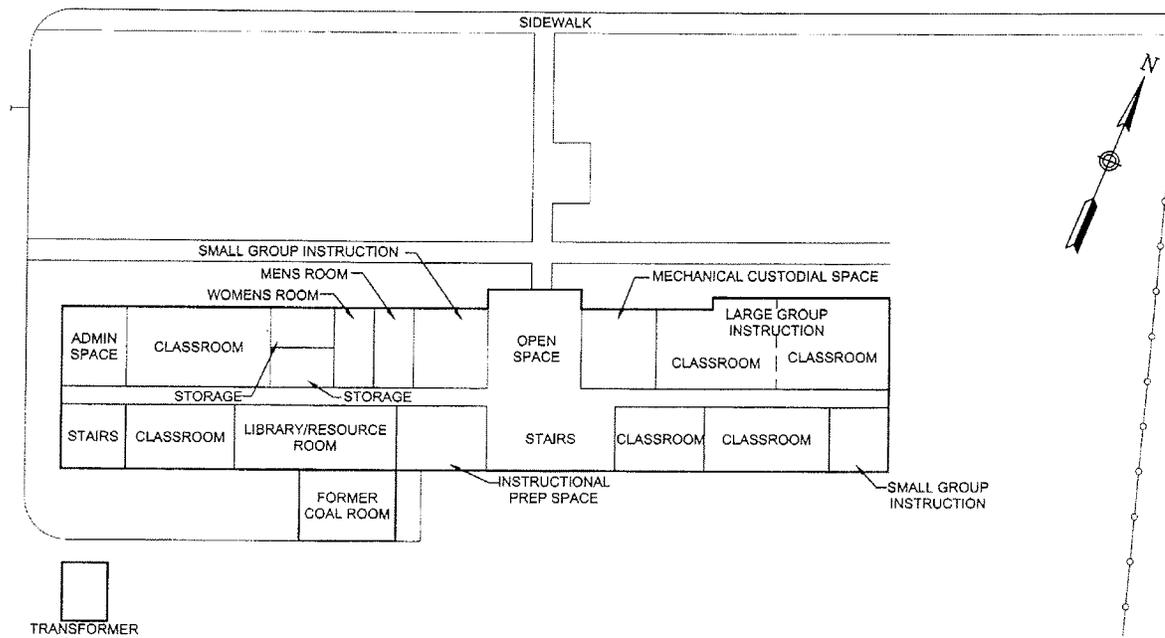
For the Preferred Alternative, the Army would assign the Property to the U.S. Department of Education for a public benefit conveyance of the entire parcel to the Norristown Area School District (NASD). The Property would be used for an elementary school as recommended by the Musselman Memorial USARC Local Redevelopment Authority (the “LRA”) in its redevelopment plan (See Appendix A).

At a public meeting on September 12, 2007 the Montgomery County Board of Commissioners, Pennsylvania, passed a resolution establishing the LRA for the purpose of formulating a recommendation for the reuse of the Musselman USARC (LRA 2010). According to the *Federal Property Administrative Services Act of 1949* and the *Base Closure Community Redevelopment and Homeless Assistance Act of 1994*, the LRA screened this Federal Government surplus property by soliciting notices of interest from state and local governments, representatives of the homeless, and other interested parties. On March 26, 2010, after reviewing one reuse proposal and recommendations and all public comments, the LRA recommended that the Property be reused for a new elementary school. The LRA reuse plan was approved by the Municipality of Norristown and Plymouth Township on February 18, 2010 and by the U.S. Department of Housing and Urban Development on May 24, 2010. The U.S. Department of Education approved the NASD’s application to acquire the Property on February 4, 2010 (Appendix A).

The proposed reuse of the Property is depicted in Figure 3. Major structural renovations would not be required. Administrative offices and classrooms would be established in a manner generally consistent with the current layout of the main building. Minor renovations and facility improvements would be made to establish up to twelve classrooms, one library, and several smaller offices; furnish the school; repaint walls and ceilings; provide or update flooring and carpeting; convert the existing drill floor to a combination gymnasium/cafeteria; update the information technology (IT) capabilities of the main building with respect to computers, telephones, and other IT needs; and upgrade or modify other areas to accommodate children, teachers, and support staff, such as restrooms and faculty areas. The OMS would be used for storage.



**Proposed First Floor Plan**



**Proposed Second Floor Plan**

USARC United States Army Reserve Center

Source: Redevelopment Plan for 1Lt Ray S. Musselman Memorial U.S. Army Reserve Center (USARC), 1020 Sandy Street, Norristown, Pennsylvania, March 2010

Prepared For:

U.S. Army Corps of Engineers,  
Mobile District

Figure 3

Site Reuse Plan for Musselman USARC,  
Norristown, PA

## **3.2 Caretaker Status Alternative**

The Army in consultation with the LRA determines the initial maintenance levels for the closed Musselman USARC and their duration on a facility-by-facility basis. At a minimum these levels ensure weather tightness for buildings, limit undue facility deterioration, and provide physical security. At the end of the initial maintenance period the Army normally reduces its maintenance to the minimum level for surplus government property as required by 41 CFR Parts 102-75.945 and 102-75.965 and Army Regulation 420-1 (Army Facilities Management).

## **3.3 No Action Alternative**

Under the No Action Alternative, the Army would continue operations at the Musselman USARC at levels similar to those that occurred prior to the BRAC 2005 Commission's recommendations for closure. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated. The Reserve mission at the USARC has ended and it is unlikely that it would ever resume, given the recommendation of the BRAC Commission. Nevertheless, this No Action Alternative allows comparison of impacts between the prior mission, the caretaker status, and the proposed reuse.

## **3.4 Alternatives Considered and Eliminated From Further Analysis**

### **3.4.1 EARLY TRANSFER AND REUSE BEFORE CLEANUP IS COMPLETED**

Under this alternative, the Army would take advantage of various property transfer and disposal methods that allow the reuse of contaminated property to occur before all remedial actions have been completed. One method is to transfer the property to a new owner who agrees to perform, or to allow the Army to perform, all remedial actions required under applicable federal and state requirements. Allowing the property to be transferred before cleanup is complete requires concurrence of environmental authorities and the governor of the affected state. The property must be suitable for the new owner's intended use, and the intended use must be consistent with protection of human health and the environment. Because cleanup of the Musselman USARC is not required, the Property is not a suitable candidate for early transfer, and this alternative was not carried forward for further analysis.

### **3.4.2 OTHER REUSE ALTERNATIVES**

The LRA screened this Federal Government surplus property by soliciting notices of interest from state and local governments, representatives of the homeless, and other interested parties, as required by the *Federal Property Administrative Services Act of 1949*, the *Base Closure Community Redevelopment and Homeless Assistance Act of 1994*, and the *Redevelopment and Homeless Assistance Act of 1994*. There was no homeless provider interested in the Property. Only the NASD submitted a notice of interest. Because no other notices of interest were submitted, no other reuse alternatives are carried forward for further analysis in this EA.

## **4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES**

This chapter describes the existing environmental and human resources that could potentially be affected by the Proposed Action and alternatives. The affected environment is the baseline to understand the potential effects of the alternatives under consideration (40 CFR 1502.15). The geographic region of influence (ROI) or study area for each resource category is the Musselman USARC, unless stated otherwise in the individual resource category discussion. Most of the baseline information was taken from existing documentation.

This chapter also describes the potential impacts of the Proposed Action and each alternative. An impact is defined as a consequence from modification to the existing environment due to a proposed action or alternative. Impacts can be beneficial or adverse, can be a primary result of an action (direct) or a secondary result (indirect), and can be permanent or long lasting (long term) or temporary and of short duration (short term).

Impacts are classified as significant or not significant based on significance criteria developed for the affected resource categories analyzed. For many resource categories, significance criteria are necessarily qualitative in nature. Quantitative criteria can be established when there are specific numerical limits established by regulation or industry standard. Significance criteria are based on existing regulatory standards, scientific and environmental documentation, and/or professional judgment. Significant impacts are those which would exceed the quantitative or qualitative limits of the established criteria, such as actions that would threaten a violation of federal, state or local law or requirements imposed for the protection of the environment, or that would have adverse effects upon public health or safety. Impacts do not necessarily mean negative changes, and any detectable change is not, in and of itself, considered to be negative. In the following discussions, to highlight adverse impacts for the decision maker, the impacts are considered adverse unless identified as beneficial.

Twelve resource areas were considered for potential impacts from the Proposed Action and alternatives: 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. Some resources were eliminated from detailed analysis as described below.

### **4.1 Environmental Resources Eliminated from Further Consideration**

Army NEPA Regulations (32 CFR § 651.14) state the analysis should reduce or eliminate discussion of minor issues to help focus analyses. This approach minimizes unnecessary analysis and discussion during the NEPA process and in analysis documents. The CEQ Regulations for implementing NEPA (40 CFR § 1500.4(g)) emphasize the use of the scoping process, not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the environmental assessment/environmental impact statement process. Resources eliminated from further consideration in this EA are either not present at the Property, are present but not impacted, or are present but the Proposed Action would have little or no measurable environmental effect.

#### 4.1.1 ENVIRONMENTAL RESOURCES THAT ARE NOT PRESENT

None of the alternatives would have direct, indirect, or cumulative impacts on these environmental resources, because these environmental resources do not exist on or near the Property:

- **Coastal Barriers and Zones**—This Property is not in a coastal zone.
- **Prime or Unique Farmlands**—The land at the Musselman USARC is not farmland. The Farmland Protection Policy Act does not apply to the Property.
- **Surface Water Features**—No surface water features are located in the immediate vicinity of the Property (USACE Louisville 2007). The nearest surface water feature is Diamond Run Creek, located about 0.2 mile southwest of the Property. The Schuylkill and Delaware Rivers are located about 0.5 mile south-southwest and about 15 miles southeast, respectively (USACE Louisville 2007).
- **Floodplains**—The Property is not located within a 100- or 500-year floodplain [Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Flood Plain Panel Number (Community Panel 42091C0352F)] (FEMA 2011).
- **Wetlands**—No evidence of wetlands was observed on the Property including wetland vegetation, hydric soils, or wetland hydrology. The National Wetlands Inventory Map did not document wetlands located on the Property (USFWS 2011). National Resource Conservation Service soils maps indicated no hydric soils on the Property (USDA NRCS 2011).
- **National and State Parks**—The nearest National Park is the Valley Forge National Park located 8 miles west of the Property and the nearest Scenic Trail is the Appalachian National Scenic Trail, which is located approximately 111 miles west of the Property. Norristown Farm State Park is located approximately 3 miles from the Property.
- **Wilderness Areas and Wildlife Refuges**—The nearest national wilderness area is the Brigantine Wilderness Area, New Jersey, which is located approximately 85 miles southeast of the Property. The John Heinz National Wildlife Refuge at Tinicum is located approximately 28 miles from the Property.
- **National Wild and Scenic Rivers**—The nearest National Wild and Scenic River is the Lower Delaware River, which is located approximately 37 miles east of the Property.
- **Federal- and State-Listed Threatened, Endangered, or Candidate Species**—The USFWS concurred in informal coordination that threatened and endangered species would not be affected by the Proposed Action. The Pennsylvania Game Commission and the Pennsylvania Department of Conservation and Natural Resources concurred that no effect to state sensitive species is expected. See Appendix B.
- **Prime or Unique Wildlife Habitat**—The Property is highly disturbed, lacks natural habitat, and the USFWS has not designated critical habitat on or in the vicinity of the Property (Appendix B).

- **Cultural, Historic, and Archeological Resources**— The 99th RSC conducted a architectural survey and an assessment of potential archaeological resources at the Musselman USARC in January 2011 and determined that no archaeological or historic resources are present (Appendix C). The Pennsylvania SHPO concurred on June 3, 2011 with the 99<sup>th</sup> RSC’s determination that there are no historic properties present to be impacted by the proposed disposal and reuse (Appendix B).

#### **4.1.2 ENVIRONMENTAL RESOURCES THAT ARE PRESENT, BUT NOT IMPACTED**

None of the alternatives would have direct, indirect, or cumulative impacts on these environmental resources, because no large-scale demolition, renovation, construction, or reuse activities are planned that would alter or affect these resources:

- **Geology and Soils**—Geological hazards such as sinkholes, caves, mines, or quarries do not exist on or adjacent to the Property. Seismic risk is relatively small (USGS 2011). Any minor soil disturbance that would occur through minor exterior remodeling or landscaping would not be significant, with implementation of best management practices, as necessary, to reduce erosion.
- **Storm Water Runoff**—The Proposed Action would not increase impervious surfaces and the direction and flow of storm water runoff would not be altered.
- **Groundwater Drinking Quality, Availability, or Use**—Groundwater is not used as the source for drinking water. The Proposed Action would not increase impervious surfaces, result in contamination of groundwater resources or drinking water, or diminish water resource availability. Drinking water is supplied by the Pennsylvania American Water Company which obtains raw water from the Schuylkill River for the Norristown system.

#### **4.1.3 ENVIRONMENTAL RESOURCES ARE PRESENT, BUT THE PROPOSED ACTION WOULD HAVE LITTLE OR NO MEASUREABLE ENVIRONMENTAL EFFECT ON THESE RESOURCES**

##### **4.1.3.1 Aesthetics and Visual Resources**

None of the alternatives would have a significant direct, indirect, or cumulative impact on aesthetics or visual resources because no substantial demolition or construction would occur and the Property would remain essentially unchanged in appearance.

Short-term direct adverse impacts to aesthetics would occur from ground disturbance; the presence of workers, vehicles, equipment; and the generation of dust and vehicle exhaust associated with the minor interior renovations and facility improvements to the existing buildings. Additional short-term adverse impacts associated with the possible construction of an outdoor playground and general landscaping are also expected. However, these impacts would be temporary and once work is complete, the reclamation of the site would remove these visual impacts. In addition, NASD intends to work with professional contractors to design appropriate landscape and lighting for an elementary school (NASD 2011). Possible landscape enhancements, such as planting trees along the western property boundary and small islands of

shrubs to break up the appearance of the parking lots would be evaluated (LRA 2010). Such enhancements would create direct and long-term benefits to aesthetics.

The level of nighttime lighting at the Property is expected to remain the same, with only dim security lighting utilized at night. Since many of the surrounding businesses already utilize security lighting, no impacts from lighting are expected.

Under the Caretaker Status Alternative, impacts to aesthetics would not occur since the facilities would be properly maintained so that no deterioration occurs.

Under the No Action Alternative, the Army would continue to use the Musselman USARC and no impacts or changes to aesthetics and visual resources would occur.

#### **4.1.3.2 Noise**

None of the alternatives would have a significant direct, indirect, or cumulative impact on noise levels, because noise levels would remain similar to existing levels. The primary sources of noise would continue to be from vehicle traffic and other sources such as heating, ventilation, and air conditioning. The Army classifies areas with noise levels from these sources as Zone 1, compatible with all land uses, including residential.

Under the Preferred Alternative, short-term direct noise impacts could occur during interior renovations to buildings and the possible construction of an outdoor playground, including increased commuter traffic from construction workers and noise from machinery. It is not expected that extensive large construction equipment would be required for interior renovations or construction of an outdoor playground.

Direct long-term noise impacts would occur from increased vehicular traffic to the elementary school. Vehicles would include privately owned vehicles and school buses. Daily usage of the Property is estimated to increase from approximately seven permanent employees and an average of 40 reservists one weekend a month to 368 (estimated maximum of 350 children and 18 teachers/staff) each weekday. It should be noted, however, that the majority of the children would be transported to and from the school via six school buses based on the reuse plan, thereby making the increase in traffic less severe than the total numbers would suggest and the impact of increased traffic noise associated with the Preferred Alternative would not be significant. Outdoor property maintenance activities, such as lawn mowing and landscaping would remain consistent with the current use of the Property.

Under the Caretaker Status Alternative, no new sources of noise or increases in noise levels would result. No new receptors of noise would be located within the Property boundaries. A net decrease in traffic, and therefore traffic noise, would result from assigning the Property to caretaker status.

Under the No Action Alternative, the Army would continue to use the Musselman USARC and no new sources of noise or increases in noise levels would result. No new receptors of noise would be located within the Property boundaries.

#### **4.1.3.3 Public Services**

None of the alternatives would have a significant direct, indirect, or cumulative impact on these public services, because these providers have the capacity to provide service and any changes in demand would be insignificant.

- **Law Enforcement**—Norristown Police Department (Appendix B)
- **Fire Protection**—Norristown Fire Department (Appendix B)

#### **4.1.3.4 Utilities**

None of the alternatives would have a significant direct, indirect, or cumulative impact on these utilities, because these utilities have the capacity to provide service for any of the alternatives and any changes in demand and usage would be insignificant.

- **Potable Water**—provided by Pennsylvania American Water Company. The Pennsylvania American Water Company pumps an average of 216 million gallons a day, serving over 635,000 residential, industrial, and commercial customers (PAWC 2011).
- **Wastewater**—Norristown Municipal Waste Authority provides sanitary sewer service to the Property. The primary source of wastewater that is directed to the city sewer system includes non-process wastewater (bathrooms, sinks, etc.) and vehicle washing runoff (USACE Louisville 2007).
- **Electricity and Natural Gas**—PECO provides electricity and natural gas to the Property.
- **Solid Waste**—Solid waste collection services for the property are offered by several private haulers (YellowUSA 2011).

## **4.2 Environmental Resources Analyzed in Detail**

Five resource areas, including land use, air quality, socioeconomics, transportation, and hazardous and toxic substances, were identified for detailed analysis. The focus of detailed analysis is on those environmental resource areas that have the potential to be adversely impacted, could require new or revised permits, or have the potential for public concern.

### **4.2.1 LAND USE**

#### **4.2.1.1 Affected Environment**

This section describes existing land use conditions on and surrounding the Musselman USARC. Management plans, policies, ordinances, and regulations determine the types of uses that are allowable, or protect specially designated or environmentally sensitive uses. The following sections discuss the regional geographic setting, location, and climate; land use; surrounding land use; and land use plans and policies.

#### **4.2.1.1.1 Regional Geographic Setting, Location, and Climate**

The Musselman USARC is located at 1020 Sandy Hill Road and is primarily in the Municipality of Norristown, Pennsylvania, with a small portion in the southeast corner of the Property located in Plymouth Township, Pennsylvania (Figure 2). Norristown, the county seat of Montgomery County, is a 3.5-square-mile community located on the Schuylkill River, 6 miles northwest of Philadelphia. Norristown is bordered by the Township of West Norriton to the west, the Borough of Bridgeport to the south, Plymouth Township to the east, and the Township of East Norriton to the north.

The Property is located on the U.S. Geological Survey 7.5-minute Norristown quadrangle map, at an elevation approximately 233 feet above mean sea level and is on the side of a broad hill that slopes south toward the Schuylkill River.

The climate of Norristown, Pennsylvania is warm during the summer with temperatures in the 70's and cold in the winter with temperatures in the 30's. The coldest month is January, with an average minimum temperature of 23 degrees Fahrenheit. The warmest month is July with an average maximum temperature of 87 degrees Fahrenheit. The average annual precipitation is about 47 inches per year, with a fairly consistent monthly distribution (IDcide 2011).

#### **4.2.1.1.2 Land Use**

In 1955, the U.S. Government purchased the 3.45 acres of land for construction of the Musselman USARC. Construction of the main building and OMS occurred in late 1958 or early 1959. Prior to government acquisition, the Property apparently was undeveloped. Historical information sources suggest that the Property and surrounding land were open fields or were used for agricultural purposes (USACE Louisville 2007).

The Property primarily functions as an administrative, logistical, and educational facility, with limited maintenance of military vehicles occurring in the OMS building. The Property has been used by reservists for drill activities on various weekends throughout the year (USACE Louisville 2007). The site was most recently used by the 465th Transportation Company and a platoon-sized element of the 444th Human Resources Company. Section 2.2 describes the Property and Figure 2 shows the site plan.

In Norristown, the Property is zoned as a Commercial Retail district (C-R) with a Unified Development Ordinance (UDO) 2 overlay. The overlay permits institutional and educational facilities and accessory complementary services. The portion of the Property in Plymouth Township is zoned residential.

#### **4.2.1.1.3 Surrounding Land Use**

The Musselman USARC is bounded by Sandy Hill Road (also known as Sandy Street) to the north, commercial development to the north and west, and residential developments to the south and east. Land use south of the Musselman USARC consists of a small wooded area and single-family residences. A mall is located west of the Property and is mostly unoccupied. Businesses in the mall consist of a pharmacy, one retail store, and one restaurant. East of the Property is a wooded lot, followed by Fairfield Road. More single-family residences are located on the east side of this road. Directly north of the Property is Sandy Hill Road, a two-lane road. North of

Sandy Hill Road is a small convenience store, former gas station, and a neighborhood consisting of single-family homes (LRA 2010).

#### **4.2.1.1.4 Land Use Plans and Policies**

The Norristown Department of Planning and Municipal Development is responsible for preparing and implementing plans to encourage economic and community revitalization within the boundaries of the Municipality. The Department also administers land use registration permits (zoning). The Department develops and implements projects in accordance with Norristown's Comprehensive Plan, 5-Year Consolidated Plan and one Year Action Plan, Norristown Economic Revitalization Strategy, Riverfront Redevelopment Plan for the Riverfront Area, and the Open Space Plan (Norristown 2010).

#### **4.2.1.2 Consequences**

Potential impacts to land use are considered significant if the Proposed Action would:

- Conflict with applicable ordinances and/or permit requirements;
- Cause nonconformance with the current general plans and land use plans, or preclude adjacent or nearby properties from being used for existing activities; or
- Conflict with established uses of an area requiring mitigation.

##### **4.2.1.2.1 Preferred Alternative: Traditional Disposal and Reuse**

Under the Preferred Alternative, potential impacts to land use would not be significant. Land use of the Musselman USARC would change from a military site to an elementary school resulting in a direct long-term impact to land use. The Musselman USARC is included in Norristown Municipality's overlay zoning district that permits institutional and educational facilities and accessory complimentary services. School uses are generally appropriate and compatible in relation to a residential community (LRA 2010). In addition, the NASD spoke to officials of Plymouth Township and the zoning of the portion of the Property in Plymouth Township is acceptable for the proposed reuse (NASD 2011). The Preferred Alternative is compatible with zoning, ordinances, Norristown's Comprehensive Plan, and existing land uses in the vicinity of the Property; and therefore, no significant adverse impacts to land use would occur.

##### **4.2.1.2.2 Caretaker Status Alternative**

Under the Caretaker Status Alternative, potential impacts to land use would not be significant. Land use would change from an active military reserve center to a facility under caretaker status. Maintenance activities to preserve and protect the facilities would take place. These activities would not conflict with applicable ordinances, existing land use plans, or surrounding land use.

##### **4.2.1.2.3 No Action Alternative**

Under the No Action Alternative, the Army would continue operations at the Musselman USARC at levels similar to those that occurred prior to the BRAC Commission's recommendations for closure and no land use changes or impacts would occur.

## 4.2.2 AIR QUALITY

### 4.2.2.1 Affected Environment

This section describes the existing air quality conditions at and surrounding the Musselman USARC. Ambient air quality conditions are discussed first followed by emission sources in the area of the Musselman USARC and greenhouse gases (GHGs).

#### 4.2.2.1.1 Ambient Air Quality Conditions

The ambient air quality in an area can be characterized in terms of whether it complies with the National Ambient Air Quality Standards (NAAQS). The *Clean Air Act* (42 U.S.C. 7401 et seq.) requires the EPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS have been established for six criteria pollutants: carbon monoxide; lead; nitrogen dioxide; ozone; particulate matter (which includes both particulate matter with an aerodynamic size less than or equal to 10 microns [ $PM_{10}$ ] and particulate matter with an aerodynamic size less than or equal to 2.5 microns [ $PM_{2.5}$ ]); and sulfur dioxide. Table 1 lists the NAAQS primary and secondary standards for each criteria pollutant.

**Table 1.** National Ambient Air Quality Standards.

Pollutant	Primary Standards	Secondary Standards
<b>Carbon monoxide (CO)</b>		
8-hour average	9 ppm	None
1-hour average	35 ppm	None
<b>Lead (Pb)</b>		
Rolling 3-month average	0.15 $\mu\text{g}/\text{m}^3$	Same as Primary
Quarterly average	1.5 $\mu\text{g}/\text{m}^3$	Same as Primary
<b>Nitrogen dioxide (NO<sub>2</sub>)</b>		
Annual arithmetic mean	0.053 ppm	Same as Primary
1-hour	0.10 ppm	None
<b>Ozone (O<sub>3</sub>)</b>		
8-hour average (2008 standard)	0.075 ppm	Same as Primary
<b>Particulate matter less than 10 microns (PM<sub>10</sub>)</b>		
24-hour average	150 $\mu\text{g}/\text{m}^3$	Same as Primary
<b>Particulate matter less than 2.5 microns (PM<sub>2.5</sub>)</b>		
Annual arithmetic mean	15.0 $\mu\text{g}/\text{m}^3$	Same as Primary
24-hour average	35 $\mu\text{g}/\text{m}^3$	Same as Primary
<b>Sulfur dioxide (SO<sub>2</sub>)</b>		
Annual arithmetic mean	0.03 ppm	None
24-hour average	0.14 ppm	None
3-hour average	None	0.5 ppm
1-hour average	0.075 ppm	None

Source: 40 CFR 50.4 through 50.13  
 $\mu\text{g}/\text{m}^3$  micrograms per cubic meter  
 ppm parts per million

Musselman USARC is located in Montgomery County, Pennsylvania, in EPA Region 3. Montgomery County is designated as in attainment of the NAAQS for carbon monoxide, nitrogen dioxide, PM<sub>10</sub>, sulfur dioxide, and lead. However, Montgomery County is designated as in non-attainment of the NAAQS for ozone and PM<sub>2.5</sub>. This designation requires the Commonwealth of Pennsylvania to develop and implement plans to improve air quality.

Section 176(c)(1) of the *Clean Air Act* requires federal agencies to ensure that their actions conform to applicable implementation plans for the achievement and maintenance of the NAAQS for criteria pollutants. To achieve conformity, a federal action must not contribute to new violations of standards for ambient air quality, increase the frequency or severity of existing violations, or delay timely attainment of standards in the area of concern (for example, a state or a smaller air quality region). Federal agencies prepare written Conformity Determinations for federal actions that are in or affect NAAQS nonattainment areas or maintenance areas when the total direct or indirect emissions of nonattainment pollutants (or their precursors in the case of ozone) exceed specified thresholds. Conformity with the EPA-approved state implementation plan is demonstrated if the project emissions fall below the threshold value *de minimis* emissions.

#### **4.2.2.1.2 Air Pollutant Emissions at Musselman USARC**

The Musselman USARC requires no air emission permits because no significant emission sources exist at the facility. Emissions from the heating and ventilation system are not significant. Emissions from vehicle exhaust from five to seven personnel who worked at the facility on a regular basis and the 35 to 40 personnel who traveled to the site for drill weekends are also not significant.

Montgomery County is assigned to Zone 1 on the U.S. Environmental Protection Agency's (EPA's) Map of Radon Zones, with a predicted average indoor radon screening level greater than 4 picocuries per liter (EPA 2011). Zone 1 is considered to have the highest potential for radon. Buildings with long-term radon concentrations between 4 and 10 picocuries per liter should take action to reduce exposures within the next few years. A site-specific radon survey was conducted at the Property in November 1988 and February 1989. Passive radon test kits were placed in randomly selected rooms on the first floor of both the main and OMS buildings. The average radon level in both buildings was less than the EPA's recommended maximum allowable exposure level of 4 picocuries per liter (USACE Louisville 2007).

#### **4.2.2.1.3 Greenhouse Gas Emissions**

There is broad scientific consensus that humans are changing the chemical composition of Earth's atmosphere. Activities such as fossil fuel combustion, deforestation, and other changes in land use are resulting in the accumulation of trace GHGs, such as carbon dioxide, in our atmosphere. An increase in GHG emissions is said to result in an increase in the Earth's average surface temperature, which is commonly referred to as global warming. Large increases in global temperatures could have considerable detrimental impacts on natural and human environments.

GHGs include water vapor, carbon dioxide, methane, nitrous oxide, ozone, and several hydrocarbons and chlorofluorocarbons. Each GHG has an estimated Global Warming Potential

(GWP), which is a function of its atmospheric lifetime and its ability to absorb and radiate infrared energy emitted from the Earth's surface. A gas's GWP provides a relative basis for calculating its Carbon Dioxide Equivalent (CO<sub>2</sub>e), which is a metric measure used to compare the emissions from various GHGs based upon their GWP. Carbon dioxide has a GWP of 1, and is therefore the standard to which all other GHGs are measured.

Executive Order 13423 sets as a goal for all federal agencies the improvement of energy efficiency and the "reduc[tion] of greenhouse gas emissions of the agency, through reduction of energy intensity by (i) 3 percent annually through the end of fiscal year 2015, or (ii) 30 percent by the end of fiscal year 2015, relative to the baseline to the agency's energy use in fiscal year 2003." The U.S. Army Energy Strategy for Installations also contains strategies to reduce energy waste and improve efficiency.

#### **4.2.2.2 Consequences**

Potential impacts to air quality are considered significant if the Proposed Action would:

- Increase ambient air pollution above any NAAQS;
- Contribute to an existing violation of any NAAQS;
- Interfere with or delay timely attainment of NAAQS; or
- Cause direct emissions of 25,000 metric tons of CO<sub>2</sub>e or more.

Equations from the U.S. Air Forces' Air Conformity Application Model (ACAM) were used to calculate annual air emissions from stationary sources, such as the natural gas heating system, at the Musselman USARC. The ACAM equations were used because that model was developed to enable NEPA personnel to determine general conformity applicability for proposed federal actions by providing a uniform and acceptable tool. Emission factors from the California Air Resources Board's EMFAC2007 Burden model were used to calculate annual air emissions from mobile sources. The emission factors from the EMFAC model were used because they are well defined, readily available, and have been EPA-reviewed. Air emissions were calculated for the Preferred Alternative, Caretaker Status Alternative, and the No Action Alternative. Air emission calculations are shown in Appendix D; the results of these calculations are shown in Table 2.

**Table 2.** Air Emissions.

NAAQS Pollutants	Attainment or Non-attainment Status	De Minimis Emission Levels (tons/year)	Preferred Alternative Emissions * (tons/year)	Caretaker Status Alternative Emissions * (tons/year)	No Action Alternative Emissions * (tons/year)
Ozone (NOx)	Non-attainment	100	2.1	0.15	0.26
Ozone (VOC)	Non-attainment	50	0.18	0.0073	0.031
Carbon monoxide (CO)	Attainment	100	1.0	0.095	0.34
Sulfur dioxide (SO <sub>2</sub> )	Attainment	100	0.0038	0.00053	0.0011
Nitrogen dioxide (NO <sub>2</sub> )	Attainment	100	2.1	0.15	0.26
Particulate (PM <sub>10</sub> )	Attainment	100	0.099	0.0064	0.013
Particulate (PM <sub>2.5</sub> )	Non-attainment	100	0.072	0.00021	0.0017
Lead	Attainment	25	--	--	--
<b>Greenhouse gases</b>					
Carbon dioxide	Not applicable	25,000	508	100	183

\* Emissions from mobile and stationary sources  
NAAQS National Ambient Air Quality Standards

#### 4.2.2.2.1 Preferred Alternative: Traditional Disposal and Reuse

Under the Preferred Alternative, potential impacts to air quality would not be significant. Vehicle traffic from the proposed school would include up to six school buses to transport students to the facility on Monday through Friday and approximately 14 to 18 staff vehicles, plus vehicles belonging to visitors. These vehicle numbers would be slightly greater than those for the five to seven full-time workers who currently travel to the Musselman USARC daily and the 35 to 40 persons who travel to the facility periodically. Although vehicle emissions from the planned reuse might be slightly greater than existing vehicle emissions, the increase would not be significant. The proposed reuse for the main administration building would continue to require boilers as part of the heating and ventilation system, but the emissions from the boilers should not be significantly different than those from existing usage.

The small incremental changes in motor vehicle and boiler emissions from the proposed reuse would not increase ambient air pollution above the NAAQS, would not contribute to existing violations of the NAAQS, and would not significantly contribute to, nor interfere with, timely attainment of the NAAQS for ozone or particulate matter.

The Musselman USARC is located in Montgomery County, an area that has been designated as a moderate nonattainment area for ozone (8-hour standard) and for PM<sub>2.5</sub> (1997 standard). The *Clean Air Act* conformity threshold values for this area are 100 tons per year for the ozone precursor nitrogen oxides, 50 tons per year for the ozone precursor volatile organic compounds, and 100 tons per year for PM<sub>10</sub> (40 CFR 93.153). PM<sub>2.5</sub> is a subset of PM<sub>10</sub> and, by definition, a source is considered to be major for PM<sub>2.5</sub> if it emits or has the potential to emit 100 tons per year of PM<sub>10</sub>. The Preferred Alternative would not produce additional emissions that are greater than the threshold *de minimis* values for criteria pollutants as described above. Therefore, the Preferred Alternative falls into conformity with the EPA-approved state implementation plans and a written Conformity Determination is not required. A Record of Non-Applicability (RONA) documenting this determination is provided in Appendix D.

Because Montgomery County is assigned to Zone 1 on the EPA's Map of Radon Zones, the NASD should perform initial radon monitoring to verify that radon levels do not exceed the EPA's 4 picocuries per liter action level.

Carbon dioxide would be the predominant GHG generated during reuse activities. The Preferred Alternative is expected to cause direct long-term emissions of about 461 metric tons (508 tons) of CO<sub>2</sub>e annually due to the burning of fossil fuels during vehicle use and maintaining inside building temperature. This is below the recommended screening level for including a quantitative and qualitative assessment of GHG emissions of 25,000 metric tons of CO<sub>2</sub>e emissions annually. This estimate of direct CO<sub>2</sub>e annual emissions is based on an assumption of a 180-day school year, 23 passenger vehicles at the facility per day (18 staff automobiles and 5 visitors), each car driven 20 miles per day, six school buses at the facility per day, and each school bus driven 100 miles per day.

#### **4.2.2.2 Caretaker Status Alternative**

Under the Caretaker Status Alternative, potential impacts to air quality would not be significant. The quantity of air emissions from vehicle traffic would be reduced from existing conditions. The daily vehicle traffic from five to seven workers and the periodic vehicle traffic from 35 to 40 persons during drill weekends would be eliminated. The number of maintenance workers, and thus the quantity of emissions from vehicle traffic, would be less than existing conditions. Therefore, the impacts to air quality would not be significant.

#### **4.2.2.3 No Action Alternative**

Under the No Action Alternative, the Army would continue operations at the Musselman USARC at levels similar to those that occurred prior to the BRAC Commission's recommendations for closure and no changes or impacts would occur to air quality.

### **4.2.3 SOCIOECONOMICS**

#### **4.2.3.1 Affected Environment**

This section describes the existing socioeconomic conditions for the economic ROI, Montgomery County, which would provide the necessary goods and services to future occupants or users of the Musselman USARC, including food, gasoline, and miscellaneous supplies. Socioeconomic factors include economic development, demographics, housing, quality of life, environmental justice, and protection of children. Socioeconomic factors for the ROI were compared to those for the state of Pennsylvania.

##### **4.2.3.1.1 Economic Development**

The U.S. Census Bureau (U.S. Census Bureau 2010a) reported that the total workforce within the state of Pennsylvania was 6,339,699 and the total workforce within Montgomery County was 425,828. Per capita income statistics from the 2005-2009 U.S. Census period indicate that the average per capita income of Montgomery County was significantly higher than the state's per capita income. Per capita income statistics for each area are included in Table 3. The median household income of Montgomery County was also significantly higher than that of the state (U.S. Census Bureau 2010a). Montgomery County's unemployment rate (3.3 percent) was lower than the state's employment rate (4.3 percent) during that period. Table 3 displays selected income characteristics for the ROI and Pennsylvania.

**Table 3.** Regional Income Statistics for 2005-2009.

Area	Workforce	Per Capita Income (\$)	Median Household Income (\$)	Unemployment Rate (%)
Pennsylvania	6,339,699	\$ 26,678	\$ 49,737	4.3
Montgomery County	425,828	\$ 39,511	\$ 75,728	3.3

SOURCE: U.S. Census Bureau 2010a

The top three industry sectors and top three occupations within Montgomery County and Pennsylvania are similar and are shown in Table 4.

**Table 4.** Regional Employment Statistics for 2005-2009.

Area	Top Three Industries (%)	Top Three Occupations (%)
Pennsylvania	1 - Educational services, and health care and social assistance (24.3) 2 - Manufacturing (13.2) 3 - Retail trade (11.7)	1 - Management, professional, and related occupations (34.8) 2 - Sales and office occupations (25.8) 3 - Service occupations (16.3)
Montgomery County	1 - Educational services, and health care and social assistance (24.0) 2 - Professional, scientific, and management, and administrative and waste management services (13.9) 3 - Manufacturing (12.8)	1 - Management, professional, and related occupations (47.0) 2 - Sales and office occupations (26.2) 3 - Service occupations (11.7)

SOURCE: U.S. Census Bureau 2010a

#### **4.2.3.1.2 Demographics**

Pennsylvania and Montgomery County both experienced an increase in population from 2000 to 2009. Pennsylvania's overall increase was approximately 2 percent, while Montgomery County experienced slightly larger growth at approximately 3.5 percent (U.S. Census Bureau 2010b).

According to the 2005-2009 U.S. Census estimates, Pennsylvania's percentage of individuals with a high school diploma was 86.9 percent (U.S. Census Bureau 2010a). Montgomery County had a higher percentage of high school graduates (92.2 percent). Montgomery County's percentage of individuals with Bachelor's Degrees was significantly higher than the state's. Table 5 provides selected statistics for population trends and educational attainment for persons 25 years and older for 2005-2009.

**Table 5.** Regional Population and Education.

Area	2000 Population	2005-2009 Population	Population Trend 2000-2009 (%)	% High School Graduates	% Bachelor Degree or Higher
Pennsylvania	12,281,054	12,516,596	+ 1.9	86.9	26.0
Montgomery County	750,097	776,306	+ 3.5	92.2	43.7

SOURCES: U.S. Census Bureau 2010a, U.S. Census Bureau 2010b

#### 4.2.3.1.3 Housing

Montgomery County had a higher housing occupancy rate than the state. Housing statistics within the region reveal that the median home value was significantly higher in Montgomery County than the state of Pennsylvania. Median rent in Montgomery County was also significantly higher than the state as a whole. Selected housing characteristics related to occupancy status, median house value, and median monthly rent are presented in Table 6.

**Table 6.** Regional Housing Characteristics for 2005-2009.

Area	Number of Housing Units	Occupied Houses (%)	Owner-Occupied (%)	Renter-Occupied (%)	Median Value	Median Contract Rent
Pennsylvania	5,481,676	89.3	71.5	28.5	\$ 152,300	\$ 716
Montgomery County	313,224	95.2	74.8	25.2	\$ 294,000	\$ 996

SOURCE: U.S. Census Bureau 2010a

#### 4.2.3.1.4 Quality of Life

##### Schools

Montgomery County has approximately 48,000 students attending private schools of various grades and close to 132,000 students attending public school. There are 23 high schools with nearly 41,000 students, 26 middle schools with over 35,000 students, and 49 elementary schools with over 55,000 students (Private School Review 2011, Public School Review 2011).

NASD encompasses several communities in central Montgomery County, including the Municipality of Norristown, the Township of East Norriton, and Township of West Norriton. The Musselman USARC is located in the eastern end of the Municipality of Norristown, where NASD does not have an existing elementary or secondary education facility within NASD's boundary (LRA 2010).

##### Health

Four area medical facilities include Montgomery Hospital in Norristown, Phoenixville Hospital in Phoenixville, Lansdale Hospital in Lansdale, and Pottstown Memorial Medical Center in Pottstown. Montgomery Hospital has 282 beds; Phoenixville Hospital has 153 beds; Lansdale Hospital has 125 beds; and Pottstown has 227 beds (Hospital-Data 2011).

## Recreation

The ROI has a number of opportunities for recreation, including children and adult programs, walking trails, picnic areas, softball, baseball, basketball, bocce ball, tennis, volleyball, and horseshoes for league play. Parks within a mile of the Musselman USARC include Simmons Park, McCann Park, and the John F. Kennedy Park in Plymouth Township, Pennsylvania.

### 4.2.3.1.5 Environmental Justice

Environmental justice is the fair treatment for people of all races, cultures, and incomes, regarding the development and implementation (or lack thereof) of environmental laws, regulations, and policies. EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, directs federal agencies to address environmental and human health conditions in minority and low-income communities. A memorandum from former President Clinton concerning EO 12898 stated that federal agencies would collect and analyze information concerning a project's impacts on minorities or low-income groups when required by NEPA. If such investigations find that minority or low-income groups experience a disproportionate adverse impact, then avoidance or mitigation measures are necessary. This section describes the distribution of minority and low-income populations in the ROI.

The initial step in the environmental justice analysis process is the identification of minority populations and low-income populations that might be affected by implementation of the proposed action or alternatives. For environmental justice considerations, these populations are defined as individuals or groups of individuals, which are subject to an actual or potential health, economic, or environmental threat arising from existing or proposed federal actions and policies. Low income, or the poverty threshold, is defined as the aggregate annual mean income for a family of four correlating to \$22,050 or for a family of three correlating to \$18,310 in 2009 (Department of Health and Human Services 2011).

As indicated in Table 7, according to the 2005-2009 U.S. Census, the percent of population within the ROI considered to be minority was similar to the state's minority population. Both were lower than the nation during the same period. Pennsylvania's minority population accounted for 16.2 percent of total population, while the minority population in Montgomery County was 15.7 percent. The national percentage of population considered minority during the same time was 25.5 percent (U.S. Census Bureau 2010a). Residents identifying themselves as Black, African American, or Asian comprised a majority of the minority population in the state and the ROI.

**Table 7.** Regional Minority Population and Poverty Levels for 2005-2009.

Area	Minority Population (%)	% Individuals Below Poverty Level	% Below Poverty Level (Under Age 18)	% Below Poverty Level (Over Age 65)
Pennsylvania	16.2	12.1	16.8	9.0
Montgomery County	15.7	5.5	6.1	6.0

SOURCE: U.S. Census Bureau 2010a

According to the U.S. Census Bureau (U.S. Census Bureau 2010a) estimates, 12.1 percent of individuals in the state of Pennsylvania were below poverty level compared to 5.5 percent in Montgomery County. The poverty rate within the ROI for individuals under age 18 was significantly lower than the state, and the poverty rate for those over age 65 was also lower in the ROI. Table 7 presents selected regional poverty statistics.

#### **4.2.3.1.6 Protection of Children**

On April 21, 1997, then President Clinton issued EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. This EO recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks. These risks arise because children's bodily systems are not fully developed; because they eat, drink, and breathe more in proportion to their body weight; because their size and weight can diminish protection from standard safety features; and because their behavior patterns can make them more susceptible to accidents. Based on these factors, former President Clinton directed each federal agency to make it a high priority to identify and assess environmental health risks and safety risks that might disproportionately affect children and to ensure that policies, programs, activities, and standards address these disproportionate risks to children.

It is Army policy to fully comply with EO 13045 by incorporating these concerns in decision-making processes supporting Army policies, programs, projects, and activities. In this regard, the Army ensures that it would identify, disclose, and respond to potential adverse social and environmental impacts on children within the area affected by a proposed Army action.

#### **4.2.3.2 Consequences**

Potential socioeconomic impacts are considered significant if the Proposed Action would cause:

- Substantial gains or losses in population and/or employment;
- Disequilibrium in the housing market, such as severe housing shortages or surpluses, resulting in substantial property value changes; or
- Changes in sales volume, income, employment, and population that fall outside the historical range of economic variation for the ROI.

Potential environmental justice impacts are considered significant if the Proposed Action would cause high and disproportionate adverse health and environmental effects on minority or low-income populations. Potential impacts to protection of children are considered significant if the Proposed Action would cause disproportionate environmental health risks or safety risks to children.

##### **4.2.3.2.1 Preferred Alternative: Traditional Disposal and Reuse**

Potential socioeconomic impacts from closure, disposal, and reuse would not be significant. Changes to the existing socioeconomic baseline conditions in the ROI would be insignificant as a result of closure of the facility. The existing full-time personnel and reservists assigned to the Musselman USARC would be transferred to Willow Grove Joint Reserve Base, Pennsylvania,

which is approximately 15 miles from the Musselman USARC, and within Montgomery County. There would be little or no measurable economic impact from this relocation.

The economic impacts of disposal and reuse were estimated using the Economic Impact Forecast System (EIFS) model, a computer-based economic tool that calculates multipliers to estimate the direct and indirect impacts resulting from a given action. Changes in spending and employment associated with disposal and reuse represent the direct impacts of the action. Based on the input data and calculated multipliers, the model estimates changes in sales volume, income, employment, and population in the ROI, accounting for the direct and indirect impacts of the action. For purposes of this analysis, a change is considered significant if it falls outside the historical range of ROI economic variation. To determine the historical range of economic variation, the EIFS model calculates a rational threshold value (RTV) profile for the ROI. This analytical process uses historical data for the ROI and calculates fluctuations in sales volume, income, employment, and population patterns. The historical extremes for the ROI become the thresholds of significance (i.e., the RTVs) for social and economic change. If the estimated impact of an action falls above the positive RTV or below the negative RTV, the impact is considered to be significant. For this analysis, the ROI is Montgomery County, Pennsylvania and a change in local expenditures is not anticipated to be significant. The proposed reuse includes minor renovations and maintenance to existing structures the first year to ready the facilities for use. The costs of these renovations were estimated at roughly \$500,000 by NASD. Annual maintenance costs were projected as \$265,000 for the first full year of occupancy (LRA 2010).

Based on the EIFS model, this scenario would generate 25 direct and 10 indirect jobs in the economic ROI, resulting in a 0.01 percent increase. To have a significant positive impact, an increase in employment would have to be realized above the positive RTV of 2.77 percent. The Proposed Action would not significantly impact other economic indicators estimated by the EIFS model, including sales volume, regional personal income, and population (0.01 percent, 0.0 percent, and 0.0 percent for these indicators, respectively). The positive RTVs for their respective categories are 12.57 percent, 11.64 percent, and 1.3 percent. The EIFS model output for the proposed BRAC actions at the Musselman USARC is provided in Appendix E.

Potential short-term economic benefits would be realized as a result of renovations and activity for the proposed reuse. These impacts would be in the form of additional employment, income, and business sales created but impacts would not be significant. No impacts to housing are anticipated. Development of the area as a school would provide a beneficial impact to education in the local area. An NASD evaluation indicated that the elementary school population (including pre-kindergarten and kindergarten students) was expected to significantly increase by 10 to 20 percent over the next 10 years (LRA 2010). The Property is located where no current NASD school exists and nearby students ride busses to surrounding townships. The presence of a new elementary school would provide an accessible facility near several neighborhoods and would help alleviate overcrowding of existing NASD schools (LRA 2010). No impacts to hospitals or parks are anticipated from use of the Musselman USARC as an elementary school.

No adverse potential impacts to minority or low-income populations or to children have been identified as a result of the proposed closure, disposal, and reuse activities. The Preferred Alternative would not cause high and disproportionate adverse health and environmental effects

on minority or low-income populations, because the effects of the Preferred Alternative would be minor and beneficial. The Preferred Alternative would not result in disproportionate environmental health risks or safety risks to children, because implementation of the Preferred Alternative would be protective of human health and the environment. All known hazardous materials present at the USARC have been identified and addressed (USACE Louisville 2007, 2011a, and 2011b). Any renovations would comply with federal, state, and local environmental and safety requirements. Additional information about the presence of hazardous substances on or near the Property, measures to protect populations (including children) from exposure, and the consequences that each alternative would have on air quality, water quality, soils, and other environmental conditions may be found in the appropriate sub-sections of this chapter.

#### **4.2.3.2.2 Caretaker Status Alternative**

Under the Caretaker Status Alternative, potential socioeconomic impacts would not be significant. The existing full-time personnel and reservists assigned to the Musselman USARC would be transferred to Willow Grove Joint Reserve Base, Pennsylvania, which is approximately 15 miles from the Musselman USARC, and within Montgomery County. There would be no measurable socioeconomic effects. The ROI would not experience any substantial gains or losses in population, unemployment, or housing. Under the Caretaker Status Alternative, there would be no high and disproportionate adverse health and environmental effects on minority or low-income populations and no disproportionate environmental health risks or safety risks to children, because minority and low-income populations and children would not have access to the closed USARC.

#### **4.2.3.2.3 No Action Alternative**

Under the No Action Alternative, there would be no changes to the existing socioeconomic baseline conditions. Under the No Action Alternative, children would not have access to the Property.

### **4.2.4 TRANSPORTATION**

#### **4.2.4.1 Affected Environment**

This section describes the existing transportation conditions at and surrounding the Musselman USARC. Roadways and traffic are discussed first, followed by public transportation.

##### **4.2.4.1.1 Roadways and Traffic**

The Musselman USARC is located on the south side of Sandy Hill Road in Norristown, Montgomery County, Pennsylvania. The facility is approximately 2 miles west of the intersection of Interstates 276 and 476.

Montgomery County experiences a large amount of vehicle traffic and has 39.2 miles of Turnpike and 157 miles of state highway to support that traffic (PennDOT 2009). The major highways located within the Norristown area include Interstates 76, 276, and 476; U.S. Highways 202 and 422; and State Highways 23, 363, and 320.

Sandy Hill Road does not carry a heavy amount of through-traffic. A July 2008 traffic count on Sandy Hill Road, east of the Fairfield Road intersection, showed annual average daily traffic (AADT) of 4,311 vehicles in the eastbound direction (DVRPC 2008a) and 4,560 vehicles in the

westbound direction (DVRPC 2008b). Fairfield Road, south of Sandy Hill Road, had an AADT of 7,034 vehicles in the northbound direction (DVRPC 2008c) and 6,152 vehicles in the southbound direction (DVRPC 2008d).

The 3.45-acre Musselman USARC site is accessed via Sandy Hill Road. No major streets occur within the facility's boundary. However, the site includes paved parking areas for military equipment and privately-owned vehicles. Approximately 86 percent of the site is covered by impervious surfaces such as parking areas and building footprints.

#### **4.2.4.1.2 Public Transportation**

Norristown is served by regional and local bus transit, as well as regional light rail service. Collectively, these transit services provide the public within Norristown with alternatives to single-occupant automobiles. The Musselman USARC is located approximately 1 mile east of the Norristown Transportation Center, which is operated by the Southeastern Pennsylvania Transportation Authority (SEPTA). SEPTA serves Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties. From Norristown Transportation Center, it operates high speed and regional rail lines in addition to a series of bus routes (SEPTA 2011).

The Musselman USARC does have a sidewalk on Sandy Hill Road, but this sidewalk is intermittent and does not continue down Sandy Street/East Airy Street. There is not a sidewalk on the opposite side of Sandy Hill Road. No bike paths access the Musselman USARC. The Schuylkill River Trail is located approximately 0.5 mile south of the USARC and travels along the Schuylkill River

#### **4.2.4.2 Consequences**

Potential impacts to transportation are evaluated with respect to the potential for the Proposed Action to:

- Disrupt or improve current transportation patterns and systems; and
- Change existing levels of safety.

##### **4.2.4.2.1 Preferred Alternative: Traditional Disposal and Reuse**

Under the Preferred Alternative, potential impacts to transportation would not be significant. Closing the site would eliminate the daily vehicle traffic from five to seven full-time workers and also eliminate the weekend vehicle traffic from 35 to 40 persons attending a drill weekend.

Based on the reuse plan, traffic to the area is expected to increase slightly once the school has been opened resulting in a direct long-term impact to transportation. Vehicle traffic from the proposed school would include up to six school buses to transport students to the facility on Monday through Friday at pre-determined times and approximately 14 to 18 staff vehicles, plus vehicles belonging to visitors. These vehicle numbers would be comparable, although slightly greater, than those described above for daily vehicle traffic under baseline conditions. The existing parking area on the east side of the main administration building has the capacity to handle about 15 vehicles with considerable overflow parking at the back of the main building near the OMS building. Table 8 identifies the potential impacts to traffic at the Musselman USARC. This analysis uses an existing AADT of 4,560 traveling westbound on Sandy Hill

Road just east of the Fairfield Road intersection (DVRPC 2008b) and assumes six buses and 18 staff each make two trips to and from the proposed school, for a total of four trips each and 10 visitors each make one trip to and from the school, for a total of two trips each. The proposed reuse would create 116 vehicle trips at the USARC each day, Monday through Friday, and would result in an approximate 2 percent increase in traffic volume above existing conditions on Sandy Hill Road near the USARC and an approximate 4 percent decrease in this traffic volume on the weekends. The change in daily traffic is not expected to alter the traffic flow on existing roadways or change existing levels of safety and therefore no significant impacts to transportation are expected.

**Table 8.** Potential Impacts to Traffic at the Musselman USARC.

<b>Current conditions - Active use by U.S. Army Reserve</b>									
	estimated vehicles	estimated trips <sup>a</sup>	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
full time employees	7	4	28	28	28	28	28	28	28
reservists	40	4	0	0	0	0	0	160	160
Total daily trips			28	28	28	28	28	188	188
<b>Proposed conditions - Preferred Alternative</b>									
	estimated vehicles <sup>b</sup>	estimated trips <sup>c</sup>	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
employees (14-18)	18	4	72	72	72	72	72	0	0
buses (6)	6	4	24	24	24	24	24	0	0
Visitors (10)	5	2	20	20	20	20	20	0	0
Total daily trips			116	116	116	116	116	0	0
<b>Impacts to traffic – Percent change in AADT</b>									
<b>Sandy Hill Road</b>									
AADT	4,560 <sup>d</sup>	% change	1.9	1.9	1.9	1.9	1.9	-4.1	-4.1

AADT annual average daily traffic

a Includes two roundtrip visits to facility daily (work and lunch) for full time employees and reservists (4 trips).

b maximum for estimated range used.

c Includes two roundtrip visits to facility daily (work and lunch) for full time employees and buses (4 trips) and one visit for visitors (2 trips).

d DVRPC 2008b

#### **4.2.4.2.2 Caretaker Status Alternative**

Under the Caretaker Status Alternative, potential impacts to transportation would not be significant. The daily vehicle traffic from current workers and the periodic vehicle traffic from drill weekends would be eliminated. The number of maintenance workers, and thus the amount of vehicle traffic, would be less than existing conditions. Typically for a property the size of the Musselman USARC, only one maintenance worker would be needed once every week or every other week. Services such as snowplowing would be ordered as needed.

#### **4.2.4.2.3 No Action Alternative**

Under the No Action Alternative, no changes or impacts would occur to transportation.

### **4.2.5 HAZARDOUS AND TOXIC SUBSTANCES**

#### **4.2.5.1 Affected Environment**

This section describes the conditions of hazardous and toxic substances at the Musselman USARC prior to closure. For the purpose of this analysis, the terms hazardous and toxic substances include substances that, because of their quantity, concentration, or characteristics, may present moderate danger to public health, welfare, or the environment upon being released. Hazardous materials are required to be handled, managed, treated, or stored properly by trained personnel under federal regulations that include the following: Occupational Safety and Health Administration General Industry (29 CFR 1910), Occupational Safety and Health Administration Construction Industry (29 CFR 1926), Department of Transportation Hazardous Materials (49 CFR 172), EPA Hazardous Waste Management (40 CFR 260), EPA Identification and Listing of Hazardous Waste (40 CFR 261), and EPA Standards Applicable to Generators of Hazardous Waste (40 CFR 262).

##### **4.2.5.1.1 Uses of Hazardous Materials**

Chemicals used and stored at the USARC are associated with vehicle and facility maintenance activities and with janitorial services. Certain types of chemical products used and stored at the Property would have contained Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) hazardous substances and would have been stored on a rotational basis in amounts necessary to support the unit. There is no indication that CERCLA hazardous substances were stored at the site for one year or more in excess of corresponding reportable quantities (USACE Louisville 2007).

Private contractors performed landscape maintenance and used herbicides and pesticides at the USARC. Small quantities (a few cans) of household pesticides were also used for interior building application. These uses are consistent with routine application (USACE Louisville 2007).

##### **4.2.5.1.2 Storage and Handling Areas**

Janitorial chemicals and building maintenance-related products are stored in the designated storage area within the janitorial closet located in the main building. Vehicle maintenance products and small amounts of petroleum, oil, and lubricant products are stored within designated areas within the OMS (USACE Louisville 2007).

##### **4.2.5.1.3 Hazardous Waste Disposal**

According to Army personnel and site records, hazardous substances were not released or disposed at the site. No signs of staining or noxious or foul odors were observed during a site visit prior to the Environmental Condition of Property (ECP) report (USACE Louisville 2007).

##### **4.2.5.1.4 Site Contamination and Cleanup**

The *Final Environmental Condition of Property Report for 1LT Ray S. Musselman Memorial U.S. Army Reserve Center (PA068)* categorized the Property as Type 1, indicating “an area

where no release or disposal of hazardous substances or petroleum products have occurred (including no migration of these substances from adjacent areas)” (USACE Louisville 2007). The Army completed a subsequent site investigation and an ECP Update Report in 2011. The ECP Update Report re-categorized the Property as an ECP Category Type 2, which is defined as an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred. This classification was selected based on the detection of naphthalene and toluene in the vicinity of the former underground storage tank, but at concentrations below the Pennsylvania Department of Environmental Protection (PADEP) regulatory standards (USACE Louisville 2011b).

No underground storage tanks or aboveground storage tanks are present on the Property. Historical documents mention a 10,000-gallon heating oil underground storage tank located near the OMS building; however, a recent ground-penetrating radar survey of the site concluded that there are no underground storage tanks along the OMS building (USACE Louisville 2011a). Subsurface soil samples were collected from 3 to 6 feet below ground surface and analyzed for target analytes listed on the PADEP Short List of Petroleum products for Diesel/Fuel/Fuel Oil No. 2. According to laboratory results, naphthalene and toluene were detected at estimated concentrations below PADEP regulatory standards (USACE Louisville 2011b). PADEP’s Act 2 Medium Specific Concentrations for residential scenarios were used for comparison. These are the most protective to human health.

A wash rack is located near the OMS building and is no longer in use. No evidence exists, based on visual observation and interviews, that the piping has ever historically failed or that any releases have occurred. While there is no closure documentation for the wash rack, any releases that might have occurred would be expected to be de *minimis* quantities (USACE Louisville 2007; USACE Louisville 2011b). No oil water separator exists on the Property (USACE Louisville 2007; USACE Louisville 2011b).

A historical landfill was identified at 409 Riverview Road (currently single-family residences), directly east of the Property, just east of Fairfield Road. The landfill, Permit Number X87092100312, is listed as “inactive.” The location of the landfill is in a residential neighborhood and could not be identified on the historical aerial photographs or topographic maps reviewed, or during the August 4, 2006, reconnaissance survey. The ECP Report did not identify any additional environmental issues with this site (USACE Louisville 2007).

#### **4.2.5.1.5 Special Hazards**

**Asbestos.** A 1990 asbestos survey identified asbestos-containing materials (ACM) within the OMS and main buildings (USACE Louisville 2007). The survey identified ACM in pipe and duct insulation in both buildings and in the building perimeter heat system tunnel. The survey recommended abandoning the heat system tunnel in place. The 2007 Final ECP Report states that conflicting information exists concerning the presence of ACM in floor and acoustical tiles. The 1990 ACM survey did not detect ACM in any floor or acoustical tiles, but a 1992 contract document directed the removal of ACM floor tiles from the main building. The 2007 Final ECP Report did not determine if the ACM floor tiles have been removed.

**Lead-based paint.** Lead-based paint (LBP) is potentially present in the buildings. A LBP survey was not conducted on the Property, but all buildings were constructed before 1981

(USACE Louisville 2007). Therefore, the main building and OMS have the potential to contain LBP. With the exception of the boiler room and coal room in the main building, the interior painted surfaces were in relatively good condition at the time of the 2006 site reconnaissance (USACE Louisville 2007). The exterior of the buildings are constructed with a brick veneer.

**Radioactive materials.** Radioactive materials have been present in meters stored in locked storage cages in the main building (USACE Louisville 2007). The meters were used to monitor nuclear, biological, and chemical hazards and they contain small quantities of radioactive material in sealed containers that are not regulated.

**Polychlorinated biphenyls.** Environmental compliance assessments performed in 1994 and 2001 indicate that polychlorinated biphenyls (PCBs) were disposed of during the 1994 renovation of the main building (USACE Louisville 2007). The facility has one pad-mounted transformer unit and the 1994 environmental compliance assessment noted that the local electric company confirmed that the transformer is PCB free (USACE Louisville 2007). The 2007 Final ECP Report could not identify any other electrical or hydraulic lifts that could potentially contain PCB oils.

**Munitions and explosives of concern.** No munitions and explosives of concern have been present on the Property. A 1994 renovation of the main building removed the indoor rifle range and converted the space into offices. A lead sampling study in 2002 collected wipe samples from the former firing range and found that concentrations of lead were well below the limit of 200 micrograms per square foot (USACE Louisville 2007).

**Medical waste.** No medical waste was identified during the 2007 ECP Report. The ECP Report indicated that a 1994 assessment identified medical waste in the main building that was probably used for physical examinations during drill weekends. Army personnel stated that medical staff typically properly disposed of such waste at the completion of physical examination activities (USACE Louisville 2007).

#### **4.2.5.2 Consequences**

Potential impacts to hazardous materials management are considered significant if the Proposed Action would:

- Result in noncompliance with applicable federal and state regulations; or
- Increase the amounts of generated or procured hazardous materials beyond current permitted capacities or management capabilities.

##### **4.2.5.2.1 Preferred Alternative: Traditional Disposal and Reuse**

Under the Preferred Alternative, potential impacts from hazardous and toxic substances would not be significant. All hazardous substance storage operations have been terminated on the Property. No adverse health impact is expected from petroleum constituents (naphthalene and toluene) that may remain in the subsurface soil; these were detected at estimated values below PADEP regulatory standards for residential exposure scenarios (USACE Louisville 2011b).

Prior to transferring the Property, the Army will reinspect all buildings containing ACM to determine the condition of the ACM and provide the transferee with a copy of the reinspection report. Any remaining ACM would not present a threat to human health or the environment, because the Army will require the transferee to agree to undertake any and all asbestos abatement or remediation that may be required under applicable laws and regulations and to use the Property in compliance with all applicable laws relating to asbestos.

LBP would not present an unacceptable risk to human health and the environment, because the Grantee would covenant and agree that it would not permit the occupancy or use of any buildings or structures on the Property as Residential Property, as defined under 24 *Code of Federal Regulations* Part 35, without first complying with this section and all applicable federal, state, and local laws and regulations pertaining to LBP and/or LBP hazards, including the abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential Lead-Based Paint Hazard Reduction Act of 1992).

Meters containing small quantities of radioactive materials would be removed from the Property. The ECP report did not identify any PCBs, munitions and explosives of concern, or medical waste. Radioactive materials, PCBs, munitions and explosives of concern, and medical waste would not pose a threat to human health or the environment since these hazards would not be present at the Property. Prior to transferring the Property, the Army would conduct a radiological Historic Site Assessment to identify areas where Nuclear Regulatory Commission-licensed or radium-containing materials were present and would take all actions required by the Nuclear Regulatory Commission to release these areas for unrestricted use.

Disposal and reuse of the Property by NASD for an elementary school would limit hazardous materials stored and used at the Property to common janitorial cleaning supplies, resulting in a direct long-term beneficial impact.

#### **4.2.5.2.2 Caretaker Status Alternative**

Under the Caretaker Status Alternative, potential impacts to hazardous and toxic substances would not be significant. No hazardous and toxic substances related to vehicle maintenance would be stored on site. The quantity of hazardous and toxic substances related to facility maintenance activities would be comparable to existing conditions. No significant impacts would occur.

#### **4.2.5.2.3 No Action Alternative**

Under the No Action Alternative, the Musselman USARC would continue functioning under the existing baseline conditions. No changes or impacts would occur to hazardous and toxic substances.

### **4.3 Cumulative Effects**

CEQ regulations stipulate that the cumulative effects analysis within an EA consider the potential environmental impacts resulting from the “incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such actions” (40 CFR 1508.7). Cumulative impacts can result from

individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (federal, state, and local) or individuals.

The scope of the cumulative effects analysis involves evaluating impacts to environmental resources by the geographic extent of the effects and the time frame in which the effects are expected to occur. Past, present, and reasonably foreseeable actions are identified first, followed by the cumulative effects that could result from these actions when combined with the Proposed Action.

#### **4.3.1 PAST, PRESENT, AND REASONABLY FORESEEABLE ACTIONS**

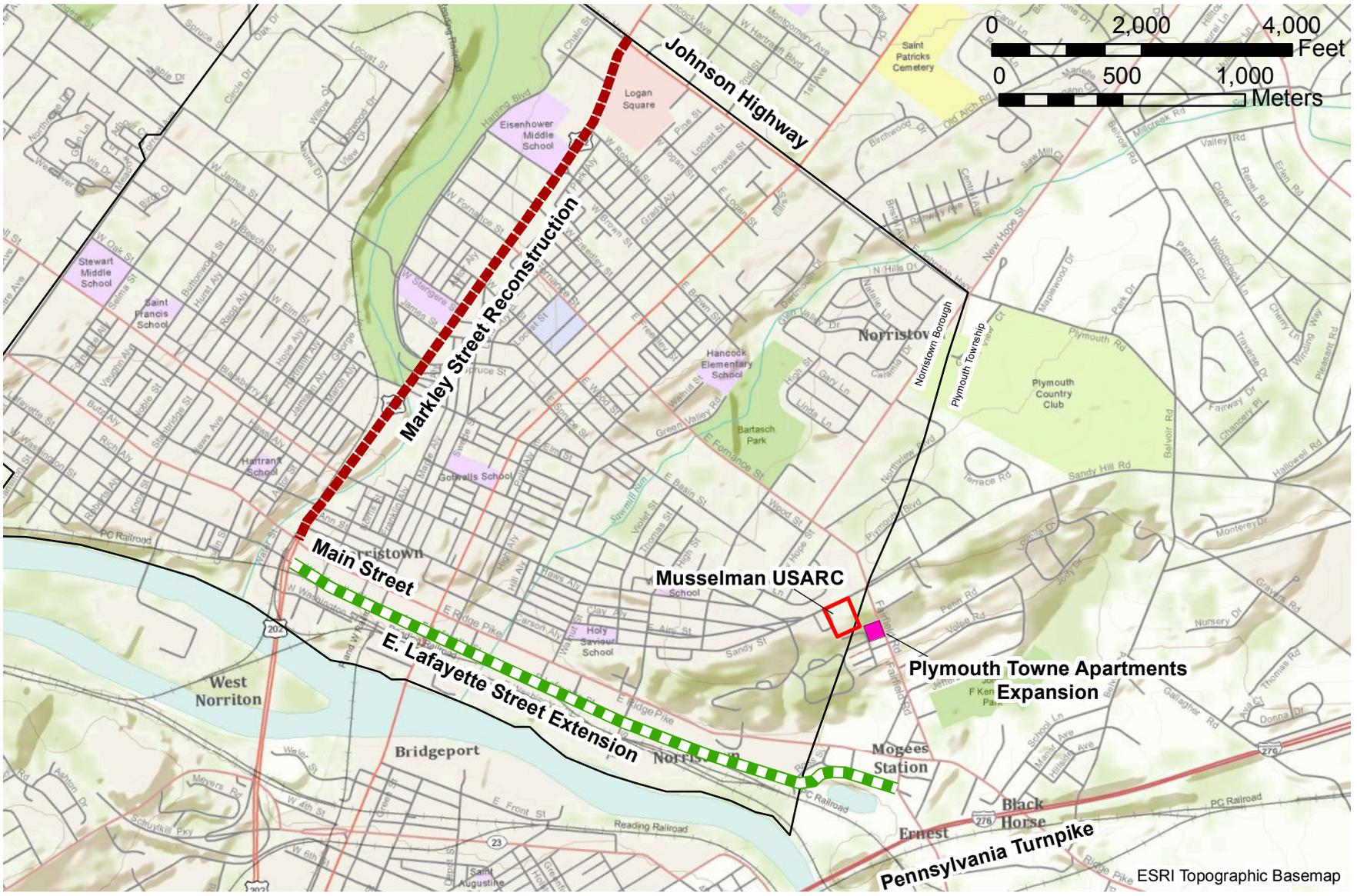
The geographic area analyzed for cumulative effects of past, present, and foreseeable future actions includes the Norristown municipality and Plymouth Township. Two reasonably foreseeable future actions in the Norristown municipality were identified and include the following: 1) Extension of Lafayette Street to the Pennsylvania Turnpike; and 2) Markley Street (US 202) reconstruction project from Johnson Highway to Main Street.

To improve highway access to downtown Norristown and its riverfront, Montgomery County is extending Lafayette Street in Norristown to the Pennsylvania Turnpike (Montgomery County 2011). Construction is segregated into several phases and the most immediate future phases include the extension of Lafayette Street from Ford Street (approximately 1 mile from the USARC), its current terminus, to Conshohocken Road (approximately 0.6 mile from the USARC) beginning in 2012. A signalized intersection would be created at the new terminus (Montgomery County 2011). Construction for phase 2 is likely to begin in 2013 and includes realigning Conshohocken Road along the widened Diamond Avenue, providing a new connection road between Ridge Pike and the Lafayette Street extension, and realignment of the Diamond Avenue and Fairfield Road intersection, approximately 0.5 mile from the USARC (Montgomery County 2011). Improvements to the Ridge Pike road are also expected. Construction for all phases is expected to last 4 to 5 years (Bagley 2011).

Beginning in early 2012, Pennsylvania Department of Transportation will reconstruct Markley Street (US 202) in Norristown from the Johnson Highway to Main Street. The closest point of this project to the Musselman USARC is approximately 1.3 miles. The project is expected to last 4 years (Bagley 2011). Improvements to the area include:

- Reconstructing and widening Markley Street in key areas;
- Minor widening of the road in areas on both Main Street and Johnson Highway;
- Improving pedestrian access along Markley Street with the construction of a new sidewalk on the west side of the street between Main Street and Marshall Street; and
- Replacing some traffic signals along Markley Street (PennDOT 2009).

One foreseeable project was identified in Plymouth Township. The Plymouth Towne Apartments has a plan to construct 70 more apartments on its site, which is approximately 100 feet east and southeast of the Musselman USARC, on Fairfield Road (Weiss 2011). No fixed start date has been identified. Figure 4 identifies the locations of the reasonably foreseeable projects.



USARC United States Army Reserve Center



Prepared For:  
U.S. Army Corps of Engineers, Mobile District

Figure 4  
Locations of Reasonably Foreseeable Actions  
for Cumulative Impact Analysis

### **4.3.2 CUMULATIVE EFFECTS SUMMARY**

Environmental effects for all resources potentially affected by the Proposed Action or alternatives when combined with the past, present, and reasonably foreseeable projects in the area are discussed below.

#### **4.3.2.1 Preferred Alternative: Traditional Disposal and Reuse**

The conversion of land resources from use as a USARC to reuse by NASD for an elementary school would not cause adverse impacts to land use, aesthetics and visual resources, noise, air quality, geology and soils, water resources, biological resources, cultural resources, socioeconomics, utilities, or hazardous and toxic substances. A slight direct long-term increase in weekday traffic would occur, but this increase would not be significant when compared to existing traffic.

Reasonably foreseeable construction projects could cause short-term impacts to air quality, noise, socioeconomics, transportation, and hazardous and toxic substances. The construction projects would increase particulate matter, vehicle emissions, and wind-borne dust. These emissions would not result in significant cumulative impacts to air quality because the projects are temporary and no significant impacts to air quality would occur from the Preferred Alternative.

Because the area is economically viable with an adequate workforce, and there is no demolition or significant construction/remodeling anticipated with implementation of the Preferred Alternative, the personnel necessary to accommodate the road reconstruction projects as well as the apartment construction are readily available. Cumulative impacts to socioeconomics would be beneficial.

Traffic would increase slightly as a result of implementation of the Preferred Alternative but would not be significant. When combined with the road reconstruction projects, short-term effects would occur as transportation is routed through different areas of the municipality to avoid the reconstruction projects. Cumulative impacts to transportation would not be significant since the road projects are temporary and the Preferred Alternative site is spatially segregated from the projects. In the long term, traffic would likely increase on Sandy Street with the addition of the 70 apartments which could combine with the traffic from the Preferred Alternative. However, it is likely the access to the apartments would be from Fairfield Road.

Hazardous waste generation would increase with the construction and repaving projects and may cause short-term impacts when considered with the Preferred Alternative and the small area of the municipality. However, since the projects are not likely to overlap for extensive periods of time, cumulative impacts would not be significant.

#### **4.3.2.2 Caretaker Status Alternative**

Under this alternative, a decreased military presence at the site would cause a decrease in traffic, and therefore slight decreases in impacts to air quality, noise, utilities, and transportation over existing conditions. The impacts of the Caretaker Status Alternative when combined with impacts of the identified reasonably foreseeable projects would not cause significant changes to the environment. No cumulative impacts would occur.

#### **4.3.2.3 No Action Alternative**

Under the No Action Alternative, no impacts or changes to the existing conditions at the Musselman USARC would occur. Therefore, no cumulative impacts would occur from past, present, or reasonably foreseeable actions.

#### **4.4 Mitigation Summary**

Mitigation measures are actions required for the specific purpose of reducing the significant environmental impacts of implementing a proposed or alternative action. An EA may specify mitigation measures that, if implemented, would prevent significant impacts that would otherwise require an environmental impact statement. No mitigation measures are required for the Proposed Action discussed in this EA because resulting impacts would not meet the significance criteria described for each resource in Chapter 4; that is, the impacts would not be significant.

## **5.0 FINDINGS AND CONCLUSIONS**

The purpose of the Proposed Action is to implement the Army's proposal to dispose of the Property following closure of the Musselman USARC as directed by the BRAC Commission. Traditional disposal followed by property reuse by the NASD is the Army's Preferred Alternative. Direct, indirect, and cumulative impacts of the Preferred Alternative, the Caretaker Status Alternative, and the No Action Alternative have been considered. The evaluation performed within this EA concludes that there would be *no significant impact* to the human environment as a result of the implementation of any of the alternatives. Therefore, the issuance of a FNSI is warranted, and preparation of an environmental impact statement is not required.

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## **6.0 LIST OF PREPARERS**

Ms. Katie Roland, NEPA Support Team Project Manager, USACE Louisville  
Ms. Amanda Murphy, NEPA and Cultural Resources Specialist, 99<sup>th</sup> RSC DPW Contractor  
Ms. Julie Morgan, Archaeologist, USACE Savannah  
Mr. David Minvielle, U.S. Army Environmental Law Division  
Dr. Wendy Arjo, Wildlife Biologist, AGEISS Inc.  
Ms. Tonya Bartels, Project Manager, AGEISS Inc.  
Ms. Cyndi Bell, Environmental Scientist, AGEISS Inc.  
Mr. Aaron Klug, Environmental Scientist, AGEISS Inc.  
Ms. Andrea Linder, Environmental Scientist, AGEISS Inc.  
Ms. Melissa Russ, Geologist, AGEISS Inc.  
Mr. Leroy Shaser, Environmental Scientist, AGEISS Inc.

## 7.0 DISTRIBUTION LIST

The following agencies and/or persons were notified when the Final EA and Draft FNSI were available for review:

Raymond Bednarchik  
Pennsylvania Fish and Boat Commission  
Southeast Regional Office  
Brubaker Valley Rd and Lakeview Dr.  
P.O. Box 9  
Elm, PA 17521

Mr. George Blanchard  
Governor  
Absentee-Shawnee Tribe of Indians of  
Oklahoma  
2025 South Gordon Cooper Drive  
Shawnee, OK 74801

Rebecca Bowen  
Environmental Review Manager  
Pennsylvania Department of Conservation and  
Natural Resources  
Bureau of Forestry, Ecological Services Section  
400 Market Street, P.O. Box 8552  
Harrisburg, PA 17105-8552

Emilee Boyer  
Environmental Review Specialist  
Pennsylvania Department of Conservation and  
Natural Resources  
Bureau of Forestry, Ecological Services Section  
400 Market Street, P.O. Box 8552  
Harrisburg, PA 17105-8552

Olivia Braun  
Pennsylvania Game Commission  
Environmental Planner  
Division of Environmental Planning and Habitat  
Protection  
201 Elmerton Ave  
Harrisburg, PA 17110

Carole Copeyon  
Endangered Species Program  
United States Fish and Wildlife Service  
Pennsylvania Field Office  
315 South Allen St., Ste 322  
State College, PA 16801-4850

Ms. Tamara Francis  
Cultural Preservation Director  
The Delaware Nation  
P.O. Box 825  
Anadarko, OK 73005

Ms. Barbara Franco  
State Historic Preservation Officer  
Pennsylvania Historical and Museum  
Commission  
Bureau for Historic Preservation  
300 North Street  
Harrisburg, PA 17120-0093

Mr. Ray Halbritter  
Representative  
Oneida Indian Nation  
2037 Dream Catcher Plaza  
Oneida, NY 13421

Mr. Clint Halstow  
Chief  
Cayuga Nation of Indians  
Post Office Box 11  
Versailles, NY 14168

Doug Killough  
Pennsylvania Game Commission  
Southeast Region  
448 Synder Rd  
Reading, PA 19605

Mr. Irving Powless, Jr.  
Chief  
Onondaga Indian Nation  
RR#1, Box 319-B  
Nedrow, NY 13120

Mr. Arnold Printup  
Tribal Historic Preservation Officer  
Akwesasne Mohawk Nation  
412 State Route 37  
Hogansburg, NY 13655

Anne Marie Rohricht  
Norristown Area School District  
Chief Financial Officer  
401 N. Whitehall Rd.  
Norristown, PA 19403

Mr. Emerson Webster  
Chief  
Tonawanda Band of Seneca  
7027 Meadville Road  
Basom, NY 14013

The final EA and draft FNSI were available for review at the following library during the public comment period:

Montgomery County - Norristown Public Library  
1001 Powell Street  
Norristown, PA 19401

## 8.0 REFERENCES

- Bagley, L. (Assistant Director Montgomery County Planning Commission). 2011, July 27. Personal Communication with W. Arjo (AGEISS Inc.)
- Department of Health and Human Services. 2011. 2009 Federal Poverty Guidelines. Available at <http://aspe.hhs.gov/poverty/09poverty.shtml>. Accessed February 4, 2011.
- DoD (U.S. Department of Defense). 2005. *2005 Defense Base Closure and Realignment Commission Report, Volume 2*.
- DVRPC (Delaware Valley Regional Planning Commission). 2008a. DVRPC website. "DVRPC – Travel Monitoring". Available at <http://www.dvrpc.org/asp/trafficCount/default.aspx?recnum=48088>. Accessed October 27, 2011.
- DVRPC (Delaware Valley Regional Planning Commission). 2008b. DVRPC website. "DVRPC – Travel Monitoring". Available at <http://www.dvrpc.org/asp/trafficCount/default.aspx?recnum=48089>. Accessed October 27, 2011.
- DVRPC (Delaware Valley Regional Planning Commission). 2008c. DVRPC website. "DVRPC – Travel Monitoring". Available at <http://www.dvrpc.org/asp/trafficCount/default.aspx?recnum=48102>. Accessed October 27, 2011.
- DVRPC (Delaware Valley Regional Planning Commission). 2008d. DVRPC website. "DVRPC – Travel Monitoring". Available at <http://www.dvrpc.org/asp/trafficCount/default.aspx?recnum=48103>. Accessed October 27, 2011.
- EPA (U.S. Environmental Protection Agency). 1971, December 31. "Noise from Construction Equipment and Operations, Building Equipment and Home Appliances." NTID300.1.
- EPA (U.S. Environmental Protection Agency). 2011. EPA Map of Radon Zones. Retrieved from <http://www.epa.gov/radon/states/pennsylvania.htm>. Accessed April 28, 2011.
- FEMA (Federal Emergency Management Agency). 2011. FEMA Flood Insurance Rate Map, Flood Plain Panel Number (Community Panel 42091C0352F). FEMA Map Viewer Mapping Information Platform. Available at <https://hazards.fema.gov/wps/portal/mapviewer>. Accessed April 25, 2011.
- Hospital-Data. 2011. Hospital Data for Hospitals in the ROI. Available at [www.hospital-data.com](http://www.hospital-data.com). Accessed June 24, 2011.
- IDecide. 2011. "Norristown, PA Weather." Available at <http://www.idecide.com/weather/pa/norristown.htm>. Accessed June 5, 2011.

- LRA (Local Redevelopment Authority). 2010, March. *Redevelopment Plan for 1LT Ray S. Musselman Memorial U.S. Army Reserve Center (USARC), 1020 Sandy Street, Norristown, Pennsylvania.*
- Montgomery County. 2010. Lafayette Street Extension Project- Public Meeting. Available at [http://planning.montcopa.org/planning/cwp/fileserver\\_Path\\_PLANNING/Admin%20-%20Lafayette%20Street%20Corridor%20Project/Lafayette%20Street%20Corridor%20Project%20Meeting%20Minutes%20and%20Summaries/Lafayette Street Extension Project\\_Public Meeting\\_Summary\\_11\\_17\\_10.pdf.assetguid,32bd3fdb-e27c-44c6-a428dcd020fdf39a.pdf](http://planning.montcopa.org/planning/cwp/fileserver_Path_PLANNING/Admin%20-%20Lafayette%20Street%20Corridor%20Project/Lafayette%20Street%20Corridor%20Project%20Meeting%20Minutes%20and%20Summaries/Lafayette%20Street%20Corridor%20Project_Public_Meeting_Summary_11_17_10.pdf.assetguid,32bd3fdb-e27c-44c6-a428dcd020fdf39a.pdf). Accessed July 27, 2011.
- Montgomery County. 2011. Planning Commission Projects. Available at <http://planning.montcopa.org/planning/cwp/view,a,3,q,40405,planningNav,%7C.asp>. Accessed July 27, 2011.
- NASD (Norristown Area School District). 2011, January 24. "FW: Musselman Questions (UNCLASSIFIED)." Email sent from J. Holland (Montgomery County Planning Commission) to M. Garrett (U.S. Army Reserve 99<sup>th</sup> Regional Support Command). Attachment to email: NASD Responses for LRA for Musselman Redevelopment Jan 2011.pdf.
- Norristown. 2010. Norristown website. Available at <http://norristown.org/planning-municipal-development>. Accessed October 9, 2011.
- PAWC (Pennsylvania American Water Company). 2011. Frequently Asked Questions about Pennsylvania American Water. Available at <http://www.amwater.com/paaw/about-us/page9704.html>. Accessed June 23, 2011.
- PennDOT (Pennsylvania Department of Transportation). 2009. PennDOT website. "2009 Mileage and Travel, National Highway System". Available at [ftp://ftp.dot.state.pa.us/public/pdf/BPR\\_PDF\\_FILES/Documents/Traffic/Highway\\_Statistics/Annual\\_Report/2010/12%20-%20Mileage%20and%20Travel%20-%20National%20Highway%20System.pdf](ftp://ftp.dot.state.pa.us/public/pdf/BPR_PDF_FILES/Documents/Traffic/Highway_Statistics/Annual_Report/2010/12%20-%20Mileage%20and%20Travel%20-%20National%20Highway%20System.pdf). Accessed May 3, 2011.
- Private School Review. 2011. Montgomery County private schools. Available at [http://www.privateschoolreview.com/county\\_private\\_schools/stateid/PA/county/42091](http://www.privateschoolreview.com/county_private_schools/stateid/PA/county/42091). Accessed June 24, 2011.
- Public School Review. 2011. Montgomery County public schools. Available at [http://www.publicschoolreview.com/county\\_schools/stateid/PA/county/42091](http://www.publicschoolreview.com/county_schools/stateid/PA/county/42091). Accessed June 24, 2011.
- SEPTA (Southeastern Pennsylvania Transportation Authority). 2011. SEPTA website. "Norristown Transportation Center". Available at <http://www.septa.org/maps/station/ntc.html>. Accessed May 4, 2011.

- USACE Louisville (United States Army Corps of Engineers-Louisville). 2007, February. *Final Environmental Condition of Property Report, 1LT Ray S. Musselman Memorial U.S. Army Reserve Center (PA068), 1020 Sandy Hill Road, Norristown, PA 19401*. CH2M HILL.
- USACE Louisville (United States Army Corps of Engineers-Louisville). 2011a, April. *Final Phase II Environmental Condition of Property in Support of Base Realignment and Closure for 1LT Ray Musselman Memorial U.S. Army Reserve Center (PA068), Norristown, Montgomery County, Pennsylvania*. Bhate Associates.
- USACE Louisville (United States Army Corps of Engineers-Louisville). 2011b, September. *Environmental Condition of Property Update Report, 1LT Ray S. Musselman Memorial U.S. Army Reserve Center (PA068), 1020 Sandy Hill Road, Norristown, PA 19401*. XCEL Engineering.
- USDA NRCS (U.S. Department of Agriculture Natural Resource Conservation Service). 2011. Soil Survey of Montgomery County, Pennsylvania. Available at <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed January 31, 2011.
- USFWS (U.S. Fish and Wildlife Service). 2011. National Wetlands Inventory. Available at <http://www.fws.gov/wetlands/Data/Mapper.html>. Accessed January 31, 2011.
- USGS (U.S. Geological Survey). 2011. Earthquake Hazard Program, Pennsylvania. Available at <http://earthquake.usgs.gov/earthquakes/states/pennsylvania/history.php>. Accessed June 15, 2011.
- U.S. Census Bureau. 2010a. 2005-2009 census statistics for Montgomery County and Pennsylvania. Available at [www.census.gov](http://www.census.gov). Accessed January 25, 2011.
- U.S. Census Bureau. 2010b. 2000 census statistics for Montgomery County and Pennsylvania. Available at [www.census.gov](http://www.census.gov). Accessed January 25, 2011.
- Weiss, K. (Township Manager, Plymouth Township). 2011, August 4. Personal Communication with W. Arjo (AGEISS Inc.).
- YellowUSA. 2011. Available at [http://norristown-pa.yellowusa.com/Rubbish\\_and\\_Garbage\\_Removal.html](http://norristown-pa.yellowusa.com/Rubbish_and_Garbage_Removal.html). Accessed June 23, 2011.

## 9.0 PERSONS CONSULTED

Raymond Bednarchik  
 Pennsylvania Fish and Boat Commission  
 Southeast Regional Office  
 Brubaker Valley Rd and Lakeview Dr.  
 P.O. Box 9  
 Elm, PA 17521

Mr. George Blanchard  
 Governor  
 Absentee-Shawnee Tribe of Indians of  
 Oklahoma  
 2025 South Gordon Cooper Drive  
 Shawnee, OK 74801

Rebecca Bowen  
 Environmental Review Manager  
 Pennsylvania Department of Conservation and  
 Natural Resources  
 Bureau of Forestry, Ecological Services Section  
 400 Market Street, P.O. Box 8552  
 Harrisburg, PA 17105-8552

Emilee Boyer  
 Environmental Review Specialist  
 Pennsylvania Department of Conservation and  
 Natural Resources  
 Bureau of Forestry, Ecological Services Section  
 400 Market Street, P.O. Box 8552  
 Harrisburg, PA 17105-8552

Olivia Braun  
 Pennsylvania Game Commission  
 Environmental Planner  
 Division of Environmental Planning and Habitat  
 Protection  
 201 Elmerton Ave  
 Harrisburg, PA 17110

Carole Copeyon  
 Endangered Species Program  
 United States Fish and Wildlife Service  
 Pennsylvania Field Office  
 315 South Allen St., Ste 322  
 State College, PA 16801-4850

Ms. Tamara Francis  
 Cultural Preservation Director  
 The Delaware Nation  
 P.O. Box 825  
 Anadarko, OK 73005

Ms. Barbara Franco  
 State Historic Preservation Officer  
 Pennsylvania Historical and Museum  
 Commission  
 Bureau for Historic Preservation  
 300 North Street  
 Harrisburg, PA 17120-0093

Mr. Ray Halbritter  
 Representative  
 Oneida Indian Nation  
 2037 Dream Catcher Plaza  
 Oneida, NY 13421

Mr. Clint Halstown  
 Chief  
 Cayuga Nation of Indians  
 Post Office Box 11  
 Versailles, NY 14168

Doug Killough  
 Pennsylvania Game Commission  
 Southeast Region  
 448 Synder Rd  
 Reading, PA 19605

Mr. Irving Powless, Jr.  
 Chief  
 Onondaga Indian Nation  
 RR#1, Box 319-B  
 Nedrow, NY 13120

Mr. Arnold Printup  
 Tribal Historic Preservation Officer  
 Akwesasne Mohawk Nation  
 412 State Route 37  
 Hogansburg, NY 13655

Anne Marie Rohricht  
Norristown Area School District  
Chief Financial Officer  
401 N. Whitehall Rd.  
Norristown, PA 19403

Mr. Emerson Webster  
Chief  
Tonawanda Band of Seneca  
7027 Meadville Road  
Basom, NY 14013

Karen B. Weiss  
Township Manager  
Plymouth Township  
700 Belvoir Road  
Plymouth Meeting, PA 19462

Historical Society of Montgomery County  
1654 DeKalb St.  
Norristown, PA 19401

## **APPENDIX A. REDEVELOPMENT PLAN**

This appendix contains the *Redevelopment Plan for ILT Ray S. Musselman Memorial U.S. Army Reserve Center (USARC), 1020 Sandy Street, Norristown, Pennsylvania*. This appendix also contains the U.S. Department of Education's approval of the NASD's application to acquire the Property dated February 4, 2010.



**REDEVELOPMENT PLAN**  
*for*  
**1LT RAY S. MUSSELMAN MEMORIAL**  
**U.S. ARMY RESERVE CENTER (USARC)**  
**1020 Sandy Street**  
**Norristown, Pennsylvania**



**MARCH 2010**

Submitted by Montgomery County Planning Commission, serving as a member of the Local Redevelopment Authority (LRA) for the 2005 Base Closure and Realignment Commission (BRAC) Program.



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### **ATTACHMENTS**

1	<b>PUBLIC PARTICIPATION</b>
2	<b>MUSSELMAN USARC CHRONOLOGY</b>
3	<b>MARKET ANALYSIS</b>
4	<b>SITE PHOTOGRAPHS</b>
5	<b>PUBLIC HEARING TRANSCRIPT</b>

## **1.0 INTRODUCTION**

The First Lieutenant (1LT) Ray S. Musselman Memorial U.S. Army Reserve Center (Musselman USARC) was declared surplus Federal property by the U.S. Department of Defense (DOD) during the 2005 Base Closure and Realignment Commission (BRAC) program. Two statutes govern the disposal of base closure property: the Federal Property and Administrative Services Act of 1949; and the BRAC 1990 statute, which added the option of an economic development conveyance under the 1993 Pryor Amendments. These statutes provide a way to transfer excess federal property to another DOD component or federal agency, and ways to dispose of surplus federal property to non-federal recipients.

Under Federal BRAC regulations, the Musselman USARC must close on or before September 2011. Prior to closure, a facility redevelopment plan must be developed. DOD designated Montgomery County, working with the Musselman Memorial USARC Local Redevelopment Authority (LRA), to build consensus around a plan that balances community needs and serves as a guide for environmental analysis and property disposition by the DOD.

### **1.1 LOCAL REDEVELOPMENT AUTHORITY**

The LRA consists of representatives from the Municipality of Norristown, Plymouth Township, Montgomery County, Montgomery County Planning Commission (MCPC), Norristown Area School District (NASD), and Continuum of Care (CoC) Homeless Program. The role of the LRA is to manage the public process during redevelopment plan preparation; to serve as a single point of contact for the DOD and the community; and to deliver a redevelopment plan that balances the needs of the homeless with community economic development and U.S. Department of Housing and Urban Development (HUD) and DOD requirements.

The specific LRA responsibilities include:

- Public outreach
- Solicitation of Notices of Interest (NOIs) from interested parties, including homeless service providers.
- Consideration of NOIs in the development of reuse plans. One NOI was submitted for review by the LRA.
- Preparation of the redevelopment plan for approval by DOD, HUD, and other Federal agencies (e.g., U.S. Department of Education) that may sponsor public benefit conveyances.

## 1.2 REDEVELOPMENT PLAN PROCESS AND GOALS

The BRAC process for redeveloping surplus Federal property follows seven major steps:

- Step 1: Approval of BRAC recommendation for closure or realignment
- Step 2: Federal screening for potential federal reuse
- Step 3: DOD recognition of the LRA
- Step 4: LRA outreach actions
- Step 5: Completion of redevelopment plan and homeless assistance submission
- Step 6: HUD review
- Step 7: Military disposal of buildings and property

The Musselman USARC redevelopment plan is consistent with Step 5 of this process.

The LRA, with the Montgomery County Planning Commission (MCPC) as the designated agent, applied an inclusive community planning process to formulate shared goals and objectives in support of the Musselman USARC redevelopment plan. Community meetings were held to review the one NOI submission, which culminated in a presentation of the draft redevelopment plan at a public meeting of the affected communities on February 11, 2010. The final redevelopment plan will be approved by the LRA and submitted to DOD and HUD for review not later than March 2010.

The LRA established several goals for planning the redevelopment of the Musselman USARC, including the reuse should be:

- Environmentally sound
- Realistic, feasible, and fiscally positive
- Socially responsible and fit within the community context
- Compatible with municipal and neighborhood plans
- Supported by the broad community

The redevelopment plan provides a framework for building consensus around the preferred redevelopment of the Musselman USARC as described in this plan. The plan includes information on existing conditions, a description of the community context, an analysis of the NOI submission, and the preferred redevelopment for this property.

## **2.0 EXISTING CONDITIONS**

### **2.1 SITE LOCATION**

The Musselman USARC is a 3.45-acre parcel located at 1020 Sandy Street (Figures 1 and 2). It is bounded by Sandy Street (also known as Sandy Hill Road) to the north, commercial development to the north and west, and residential developments to the south and east. The property currently consists of administrative office space for USAR service members and a small maintenance shop.

Below are the elected officials and their political jurisdictions that affect the Musselman USARC property:

- 6<sup>th</sup> U.S. Congressional District, Jim Gerlach
- 17<sup>th</sup> District Pennsylvania Senate, Daylin Leach
- 61<sup>st</sup> District Pennsylvania House of Representatives, Kate Harper
- 70<sup>th</sup> District Pennsylvania House of Representatives, Matthew Bradford
- 4<sup>th</sup> City Council District (Norristown Municipality), Gary Simpson
- 1<sup>st</sup> Township Council District (Plymouth Township), Dean Eisenberger

The Norristown Municipal Council also includes three at-large council members: William 'Bill' Procyson, Marlon Millner, and Cathy Lawrence. The Plymouth Township Council includes Maria Weidinger as its sole at-large council member.

### **2.2 SITE CHARACTERISTICS**

The Musselman USARC contains two permanent structures (a Main Building and an Organizational Maintenance Shop or OMS), and three parking lots (Figure 3). Both structures are on concrete foundations, with concrete block walls with a brick veneer. Most of the property is covered by impervious surface material, including asphalt parking areas, driveways, concrete walkways, and the building footprints. The remaining surface area is grassed, with trees planted along the southern and eastern portions of the property. Two military equipment parking (MEP) areas and one privately-owned vehicle (POV) parking area also are contained within the property. One of MEP areas and the POV area are enclosed with chain-link security fencing topped with barbed wire. Most of the property is covered by impervious surface material, including asphalt parking areas, driveways, concrete walkways, and the building footprints. The remaining surface area is grassed, with trees planted along the southern and eastern portions of the property.

The approximate sizes of the property features are as follows:

- Main Building: 35,496 square feet (sf)
- OMS: 3,850 sf
- Pavement: 4,636 square yards (sy)
- Parking: 2,772 sy
- Access roads: 585 sy
- Sidewalks: 585 sy
- Fence line: 1,561 linear feet (lf)

Musselman USARC is on a broad hill that slopes south toward the Schuylkill River. Storm water flows to drains located in each of the two MEP areas. One drain is located between the main building and the organizational maintenance shop (OMS); the second drain is located in the south-central portion of the southwestern MEP area. No surface water features are near the property.

Attachment 2 provides recent photographs of the property and its structures.

### **2.2.1 Main Building**

The main building is an irregularly-shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor. The building's interior consists of office space, classrooms, kitchen area, storage, computer server room, former indoor firing range, and a drill hall. Based on the August 2006 site reconnaissance (USACE, 2007), the property contains a grease trap associated with the kitchen. An arms vault is located on the first floor and is used to store rifles and pistols. Ammunition is not stored in the arms vault.

During a 1994 renovation, the firing range was removed and converted into offices. Samples collected from the area in 2002 indicated that the area was safe for reoccupation. Locked storage cages are located east of the drill hall on the first floor. Non-hazardous military equipment and monitors are stored in these cages. The specific caged area where these monitors are stored was denoted with a placard labeled "Radioactive".

A boiler room is located on the southern portion of the main building. The boiler room is lower in elevation than the first floor and houses the building water heater, natural gas heating units, and bypass feeder. An electrical sub-panel also is located in the boiler room. There were cut pipes in the south and west walls.

Another room south of the boiler room contains a steel coal chute and was used to store coal for a previously decommissioned coal-fired heating system. The room was later converted to a bar-lounge area. During the January 2010 site visit, the lighting did not work, and paint, concrete, and plaster were peeling from the walls and ceiling, exposing the reinforcing steel bars in the concrete.

The second floor covers the northern half of the building and consists of offices and classrooms.

### **2.2.2 OMS Building**

The one-story OMS is used mostly for storage, but has two vehicle-maintenance bays and several small offices. The maintenance bays are not used for heavy maintenance since there is no appropriate drainage system to handle wastewaters, such as floor drains or wash racks. Typical OMS tasks include tire and oil changes, minor repairs, and preventative maintenance for wheeled vehicles.

The OMS and former wash rack area are located south of the main building. The wash rack was located outside, on the west side of the OMS building, and consisted of a concrete pad flush to the surrounding pavement. A grate was located in the center of the wash rack and is drained to the sanitary sewer. An oil water separator (OWS) was indicated to be present in a 1999 facility assessment; however, a November 2000 inspection did not identify an OWS associated with the wash rack (USACE, 2007). The interior of the OMS consists of two vehicle maintenance bays with rows of tool chests and caged storage areas. On the north side of the OMS are two offices, a restroom, electrical closet, and a communications storage room. Two flammable storage cabinets are located in the OMS and are locked.

No floor drains or trench drains were identified within the OMS building; however, a large patched section of concrete was identified in the western-most bay. This was identified as a former vehicle maintenance pit. The condition of the floor and walls of the former vehicle maintenance pit could not be assessed during site reconnaissance. In addition, the floor between the patched concrete and west wall contained an open 10-inch-diameter pipe angled down and to the east, toward where the former maintenance pit would have been. Musselman USARC is listed as a Resource Conservation and Recovery Act (RCRA) small quantity generator (USACE, 2007). Faint oil-like stains were noted on the pavement in the MEP area. These stains did not extend off the paved areas and are typical of staining found in parking lots.

### **2.2.3 Utilities**

The facility is serviced by public and local electric and gas companies. Water distribution, sanitary sewer, and storm sewer are maintained through local utilities. The infrastructure includes:

- Electric power distribution: 616 lf
- Gas pipeline: 90 lf
- Sanitary sewer: 596 lf
- Water distribution: 472 lf
- Storm sewer: 1,108 lf

The following information was obtained regarding utilities at the Musselman USARC:

**Water Service:** Pennsylvania American provides potable water service.

**Sanitary Sewer System:** Norristown Sewer Authority provides sanitary sewer service. The primary source of wastewater is non-process wastewater (bathrooms, sinks, etc.) and vehicle washing runoff.

**Gas and Electric:** Philadelphia Electric Company (PECO) provides natural gas and electric services.

Based on available information, there are no water supply wells located currently or historically at the property. There are no water supply wells within 0.25 mile of the property (USACE, 2007). No historical reports were found documenting when Musselman USARC was connected to the local sewer system, or if a septic system existed or was removed.

## 2.3 SITE HISTORY

For the past 50 years, the Musselman USARC has primarily been used for the Army's logistical, educational, and administrative purposes. Traditionally, the facility has been manned by a small, full-time staff, with peak occupancy during unit drills, special events, unit deployments, and extended training or exercises.

The U.S. Government purchased the parcel that was to become Musselman USARC in 1955. The main building was constructed in late 1958, and the OMS was reportedly built in early 1959 or sometime later. Prior to Federal government acquisition, the property apparently was undeveloped. Based on a 1942 aerial photograph, the property and surrounding land were open fields or were used for agricultural purposes. A house and barn were located on the lot directly west of the property.

A review of aerial photographs taken prior to the late 1950s did not reveal the presence of activity at the property. The Musselman USARC first appeared in a 1958 aerial photograph. In this image, the main building was present; however, the OMS building was not. The current location of the POV lot, on the northeast side of the property, appeared to be a different color than the MEP lot south of the main

building. This indicated that the POV lot was not paved. In addition, residential neighborhoods appeared to the north and east. West of the property, the house and barn noted in the 1942 aerial photograph were no longer present, and a commercial building was in its place.

In the 1965 through 1992 aerial photographs, both the main and OMS buildings were present on the property. The surrounding properties appeared unchanged with the exception of more commercial buildings west of the Property. In 1973, a residential neighborhood appears directly south of the property, and several vehicles appear in the MEP lot.

Since 2007, the current occupying units of the Musselman USARC are the U.S. Army's 465<sup>th</sup> Transportation Company and a platoon-sized element of the 444th Human Resources Company. These units are scheduled to vacate the facility on or before September 2011, and will move to a new USARC in Bristol, Pennsylvania. Prior to 2006, the Musselman USARC was occupied by Army reserve units (358<sup>th</sup> Civil Affairs Brigade and 416<sup>th</sup> Civil Affairs Battalion), which were relocated to California in 2007.

Musselman USARC has been refurbished over the past decades of use. Known improvements include a facility renovation including ceiling, lights, floor tiles, hot water heater, and electrical work (1975); paving and sidewalk improvements (1986); door replacements (1990); upgrades to heating and cooling systems (1993); removal of the indoor firing range (1994); roof replacement or repair (1995); and window replacement (1997).

## **2.4 ENVIRONMENTAL CONDITIONS**

DOD has classified the Musselman USARC as a "Type 1" property. Type 1 properties are "an area or parcel or real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties)."

Soil types at the Musselman USARC are from the Penn Series according to the U.S. Natural Resources I Conservation Service.

The U.S. Army prepared an Environmental Condition of Property (ECP) Report for the Musselman USARC in 2007 (USACE, 2007). The ECP Report documented the history of the property and any resulting environmental conditions. Previous environmental reports and areas of potential environmental concern were reviewed; the results are provided in the following subsections.

#### 2.4.1 Previous Environmental Reports

A number of environmental documents were compiled in the ECP Report. They included the following:

- A 1990 letter directed the facility to remove any existing tanks in accordance with Pennsylvania Department of Environmental Protection (PADEP) regulations.
- A 1992 letter directed subcontractors to remove asbestos-containing floor tiles from the main building.
- A 1994 draft Environmental Compliance Assessment documented hazardous waste inspection activities.
- A 1995 radon compliance report summarized the results of earlier radon surveys at the property.
- A 1995 Cultural Resource Management Plan Report documented the survey of historical information, setting and landscape, cultural resources, security, architectural information, and structure descriptions for potential eligibility to the National Register of Historic Places (NRHP). Musselman USARC was determined to be ineligible for listing on the NRHP.
- A 1995 Inventory of Significant Biological Resources found no evidence of threatened or endangered species and concluded that the property did not have the habitat to support any such species.
- A 2000 Engineering and Environmental Facility Assessment documented an environmental compliance assessment which found that the property had very few environmental problems and generated only a small amount of waste oil. The report also stated that no lead survey/abatement records could be found regarding the conversion of the firing range to a classroom and that the suspected OWS at the facility had not been maintained on a routine basis.
- A 2000 Cross-Connection Control Survey found backflow prevention deficiencies and recommended corrective actions. These deficiencies did not indicate potential environmental risk.
- A 2001 OWS Survey Report confirmed that an OWS did not exist on the property and that the suspected OWS was most likely the sewage pump station.
- *Geohydrology of Southeastern Pennsylvania* (2002) was published. The report includes the Gettysburg-Newark Lowland Section of the Piedmont Physiographic Province, which underlies the property.
- The 2002 Hydrogeological Investigation Report at Site 5, Naval Air Station/Joint Reserve Base (NASJRB) Willow Grove, Pennsylvania provided detailed information about the geology and hydrogeology of the Stockton Aquifer, which also underlies the property.
- The 2003 Range Cleanup Report documented the cleanup of the former firing range at the property.

- The 2005 Programmatic Natural Resource Management Plan concluded that the property did not contain any key natural resources, including wetlands, surface water, floodplains, or the potential for rare species.

After publication of the 2007 ECP report, a geophysical survey was conducted in December 2009 to determine the presence or absence of an underground storage tank (UST) at the property. The survey revealed that a former fuel oil UST was no longer present.

Based on the results of the ECP report and subsequent investigations, the overall health of the Musselman USARC is excellent with respect to potential environmental problems. As such, the property should not be encumbered by any restrictions or constraints with regard to redevelopment uses.

#### **2.4.2 Hazardous Substance/Waste and Petroleum Storage, Disposal, and Releases**

Chemicals formerly used and stored at the Musselman USARC were associated with vehicle and facility maintenance activities and janitorial services. Facility maintenance and janitorial products were stored in the designated storage area within the janitorial closet in the main building. Vehicle maintenance products were stored within designated areas of the OMS building. In addition, three wet-cell batteries were stored on the pavement outside the OMS building.

Certain products used and stored at the facility may have contained Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (commonly referred to as Superfund) hazardous substances and would have been stored in quantities sufficient to support the unit. The ECP report found no indication that CERCLA hazardous substances were stored, released, or disposed at the property in quantities that would trigger the CERCLA Section 120(h)(1) notification requirements for property transferred by Federal agencies. Any hazardous waste generated at the OMS has been transported and disposed at NASJRB Willow Grove.

A fuel oil UST (10,000-gallon capacity) was once located next to the OMS building. The potential for a UST was identified in 1999 when a vent pipe was observed on the Property. There is no available information indicating the UST was removed; however, the vent pipe was not observed during the 2006 site reconnaissance. There is no available information to determine if there has been a release from the UST. In December 2009, the Army conducted a geophysical survey using ground penetrating radar (GPR) to determine if the UST was still present. The results did not reveal the presence of this UST.

There were no signs of staining or noxious or foul odors noted during the November 2006 and January 2010 site visits.

### **2.4.3 Adjacent Properties**

An adjacent property, Monty's Service Center, is located on the north side of Sandy Hill Road and has reported releases of petroleum substances from three leaking underground storage tanks (LUSTs). Two of three tanks have received administrative closeout (ACO) status, while the third is listed as active. The active LUST release has resulted in petroleum, oil, and lubricant (POL)-impacted groundwater and PADEP has approved additional investigations, which include installation of monitoring wells on the property to assess environmental impacts to adjacent properties and establish the groundwater flow direction. The status of this investigation could not be readily determined as part of the Musselman USARC redevelopment plan; however, it did not appear that wells have been installed at the property.

Although the Monty's Service Center property has been identified as posing potential environmental impacts to groundwater beneath the property, available documentation has not confirmed that groundwater has been impacted. In addition, the available data have not confirmed the property is downgradient of the POL release.

## **2.5 ZONING AND MARKET ANALYSIS**

As discussed in Section 2.1, Musselman USARC is primarily located in the Municipality of Norristown, Pennsylvania, with a small portion of the property located in Plymouth Township, Pennsylvania. In Norristown, the property is zoned as a Commercial Retail district (C-R) with a Unified Development Ordinance (UDO) 2 overlay. The overlay permits institutional and educational facilities and accessory complementary services. The Plymouth Township parcel is zoned residential.

The assessed value of the property according to Montgomery County records is \$1,350,400. As Federal government property, the site is exempt from property taxes. As part of the redevelopment planning process, a market analysis of the property using simple metrics was performed by a licensed appraisal company (Rowan Associates, Inc.). The results of the market analysis are included as Attachment 3.

Several factors were considered to estimate the current market value of Musselman USARC. These factors included the location of the property, the local/regional market, and possible re-use of the USARC. The market value of the property was estimated as \$2,555,000.

### **3.0 COMMUNITY DESCRIPTION**

The Musselman USARC is immediately surrounded by mixed land use consisting of residential neighborhoods (single family, apartment, and townhouse development) and commercial properties (e.g., convenience store, restaurants, bank, and Family Dollar Store). The adjacent properties are fully developed and stable.

Land use south of the Musselman USARC consists of a small wooded area and single-family residences (Figure 6). A mall is located west of the property and is mostly unoccupied. Businesses in the mall consist of a pharmacy, one retail store, and one restaurant. East of the property is a wooded lot, followed by Fairfield Road. More single-family residences are located on the east side of this road. A historical landfill was identified at 409 Riverview Road (currently single-family residences), directly east of the property, just east of Fairfield Road. Directly north of the property is Sandy Hill Road, a two-lane road. North of Sandy Hill Road is a small convenience store, former gas station, and a neighborhood consisting of single-family homes.

#### **3.1 LAND USE AND ZONING**

As discussed in Section 2.5, Musselman USARC is primarily zoned as a Commercial Retail district (C-R), with a corner of the property zoned as Residential (D-Residential). The surrounding neighborhoods are primarily residential, with some light industry to the south and east.

#### **3.2 TRANSPORTATION**

Musselman USARC is located approximately one mile from Norristown Transportation Center (NTC), which is a major transit node served by the Southeastern Pennsylvania Transportation Authority (SEPTA). The NTC has a 500-space parking garage, two rail lines (the Norristown High Speed Line and the R6 Regional Rail Line), eight bus routes (Routes 90, 91, 93, 96, 97, 98, 99, and 131), and a common carrier bus station. However, the closest bus stop, serviced by Route 97, is an approximately 8-minute walk between the Musselman USARC and the nearest bus stop at the intersection of East Main Street and Fairfield Road based on SEPTA trip planning estimates.

Musselman USARC is located approximately 3,000 feet from the Pennsylvania Turnpike (U.S. 276); however, there are no convenient exits to the location from the highway. The closest major artery is Route 202, slightly more than a mile away; however, the roads leading to Route 202 are small, with

numerous traffic lights. The distance from the USARC to the Plymouth Meeting interchange of Route 476 (referred to as the Blue Route) is roughly 3.1 miles.

### **3.3 DEMOGRAPHICS**

The Norristown Municipality's population has remained at similar levels (approximately 31,000) from 2000 to the 2010 estimate, while Plymouth Township's population is estimated to have increased slightly (3.4 percent). Montgomery County as a whole has gained population (up 3.6 percent) over the same timeframe.

The Delaware Valley Regional Planning Commission (DVRPC) predicted that Norristown Municipality would gain 500 jobs from 2000 to 2010 and that Plymouth Township would gain 1400 jobs over the same period; it is unknown what impact the current economic climate has had on these predictions. However, Norristown's status as the County seat generates a consistent job base in the county court system and various government services, which may buffer the effects of an economic downturn. Data from the most recent census in 2000 indicated that approximately 28 percent of the labor force worked in sales and office occupations; 24 percent in management and professional occupations; 23 percent in the service industry; 16 percent in production and transportation; and 10 percent in construction, extraction, and maintenance. The percentage of workers in management was considerably lower in Norristown Municipality than Montgomery County, with a higher percentage of workers in service, production, and construction.

According to the 2000 Census, household incomes in the Municipality of Norristown and Plymouth Township were lower than the county median. The median household income of Norristown residents in 1999 was approximately \$36,000, which was 41 percent lower than Montgomery County (\$61,000). The median household income of Plymouth Township residents in 1999 was approximately \$54,000, which was 12 percent lower than Montgomery County (\$61,000). In Norristown Municipality, 13.5 percent of families lived below the poverty line, while only 2.8 percent of Montgomery County residents lived below the poverty line.

Municipality of Norristown and Plymouth Township residents generally have lower levels of education than residents of the entire county, although Plymouth Township has education levels closer to those of Montgomery County. In Norristown, 28 percent of residents do not have a high school diploma, compared to 14 percent of Plymouth Township residents and 11 percent of Montgomery County residents. However, the Norristown Area High School dropout rate has decreased from 2.1 percent in the 2002-2003 school year to 1.6 percent in the 2006 to 2007 school year. Thirteen percent of Norristown

Municipality residents and 33 percent of Plymouth Township residents have at least a bachelor's degree compared to 40 percent of Montgomery County residents.

The Norristown Economic Revitalization Strategy Update (Norristown, 2009) and the Montgomery County Planning Commission (MCPC, 2010) provide further details regarding the demographics of the area.

### **3.4 INFRASTRUCTURE**

Much of the Norristown/Plymouth Township infrastructure was installed prior to 1950, and most of it is antiquated and continues to deteriorate. Because of this, several infrastructure improvements were listed as high priorities in the Norristown Consolidated Action Plan (Norristown, 2008): water/sewer system; roadways; sidewalks; solid waste disposal; and flood drains.

Norristown Municipality is also not fully compliant with Municipal Separate Storm Sewer System (MS4) regulations, which mandate that storm water collected through ditches, curbs, gutters, or other means do not connect with a wastewater collection system. The Sewer Separation Project is designed to bring the municipality in compliance with the regulation as part of a larger effort to improve deteriorating water and sewer infrastructure and to alleviate flooding.

Other Norristown infrastructure improvement projects include the systematic inspection (and replacement as necessary) of residential sewer lines using video cameras as part of the due diligence prior to property sale; and sinkhole repairs.

### **3.5 HOUSING MARKET**

Norristown has minimal space for new residential housing construction unless significant brownfield redevelopment projects are undertaken, particularly along the Schuylkill River. In 2008, the municipality estimated that 80 percent of very low-income households have problems finding affordable housing and that 50 percent of the substandard units potentially suitable for rehabilitation are occupied by low-income households. The municipality has a slightly larger percentage of rental units than owner-occupied housing units (52 and 48 percent, respectively). The housing stock in Norristown is also significantly older than that of Montgomery County as a whole, with 58% percent of Norristown Municipality homes built before 1950, compared to only 29% of Montgomery County homes.

The goals for the municipality according to the Norristown Consolidated Action Plan (Norristown, 2008) are as follows:

- Increase the number of homeowners through a First-Time Homebuyers Program.
- Stabilize homeownership through an owner-occupied Housing Rehabilitation Program.
- Partner with local non-profits to increase owner-occupied housing.
- Minimize conversion of single family units into rental units through zoning processes.
- Use public outreach and advocacy to implement programs to minimize panic selling and block busting.
- Work to improve overcrowding through concentrated code enforcement.

The Norristown housing market is described in further detail in the Norristown Consolidated Action Plan (Norristown, 2008) and Norristown Economic Revitalization Strategy Update (Norristown, 2009).

Both Plymouth Township and Norristown Municipality have seen low growth in residential construction, with the number of housing units in the Municipality of Norristown and Plymouth Township increasing 3.2 percent and 5.2 percent, respectively from 2000 to 2008. The growth recorded by both communities was significantly lower than the Montgomery County average of 7.9 percent (MCP, 2010). A significant portion of the residential growth in Norristown experienced in the past 8 years resulted from the construction of the Regatta Apartments located near the Musselman USARC property.

### **3.6 PARKS AND RECREATION**

The 2005 Norristown Open Space Plan analyzed the availability of Norristown's recreational public open space and compared it to the recommended ratio established by the National Recreation and Park Association (NRPA). The Open Space Plan divided recreational public open spaces into two main categories: community-level spaces and neighborhood-level spaces.

Community-level parks are typically large (serving more than one neighborhood), centrally located, and have a range of facilities/amenities and parking. Neighborhood-level open spaces are typically smaller areas that serve a particular area of the community (typically one neighborhood) or a concentrated or limited population or specialized group such as elderly or tots; and provide for quiet, informal recreation as well as facilities for short term, frequent and active use.

Using NRPA's recommended ratio for open space per 1,000 people, the plan suggested that Norristown Municipality should have between 156 to 250 acres of community-level parks and 39 to 78 acres of neighborhood-level parks. The plan showed that in 2000, Norristown had 122 acres of community-level parks and 151 acres of neighborhood-level parks. Two locations, Elmwood Park and Riverfront Park,

comprise the 122 acres of community-level parks. This would indicate a deficit of 34 acres in this category; however, the plan recognized the scarcity of potential open space and recommended, instead, increasing accessibility of these parks through open space linkages.

The closest parks to the Musselman USARC are Simmons Park and McCann Park in Norristown, and the John F. Kennedy Park in Plymouth Township. A golf course (the Plymouth Country Club) is also located nearby.

### **3.7 SCHOOLS**

The Musselman USARC is within the boundaries of two municipalities; therefore, the parcel is served by the Norristown Area School District (NASD) and the Colonial School District.

#### **3.7.1 Norristown Municipality Schools**

The NASD serves students from Norristown, West Norriton, and East Norriton with one high school, three middle schools, and six elementary schools: Norristown Area High School, East Norriton Middle School, Eisenhower Middle School, Stewart Middle School, Cole Manor Elementary School, Gotwals Elementary School, Hancock Elementary School, Marshall Street Elementary School, Paul V. Fly Elementary School, and Whitehall Elementary School.

The Pennsylvania System of School Assessment (PSSA) is an assessment used by the Pennsylvania Department of Education to determine the degree to which students demonstrate proficiency in reading, writing, and math. PSSA test scores from 2005 to 2007 show that Norristown Area High and Eisenhower Middle School are under-performing in comparison to other public schools in the state. The test results mirror the majority sentiment in the community that investments must be made in the NASD to strengthen the schools servicing the municipality.

In addition to the NASD public system, a number of private schools are located in Norristown, including Calvary Baptist Children's Learning, Kennedy-Kendrick Catholic High; St. Paul Elementary School, and St. Francis of Assisi School. Another institution offering postsecondary education in the area is Montgomery County Community College in Blue Bell. The Norristown and Colonial School Districts are members of the Central Montco Technical High School located in Plymouth Meeting. The Montgomery County Intermediate Unit is located in West Norriton Township.

### **3.7.2 Plymouth Township Schools**

The Colonial School District serves students from Plymouth and Whitmarsh Townships and the Borough of Conshohocken, with two high schools, one middle school, one intermediate school, and four elementary schools: Plymouth Whitmarsh High School, Central Montco Technical High School, Colonial Middle School, Colonial Elementary, Conshohocken Elementary, Plymouth Elementary, Ridge Park Elementary, and Whitmarsh Elementary.

Private schools in Plymouth Township include St. Paul's Roman Catholic High School, St. Cosmos & Damian School, Epiphany of Our Lord School, Penn Christian Academy, St. Matthew's School, St. Titus School, and Plymouth Meeting Friends School.

## **4.0 COMMUNITY OUTREACH**

### **4.1 COMMUNITY DETAILS**

The Musselman USARC is surrounded by a mix of commercial and residential areas, and the immediate area is generally well-developed. Sandy Hill Road contains a number of businesses, with a restaurant and a convenience store across the street. The Musselman USARC does have a sidewalk on Sandy Hill Road, but this sidewalk is intermittent and does not continue down Sandy Street/East Airy Street. The closest major commercial road is East Main Street, approximately 1,500 feet south of the Musselman USARC. The main access to East Main Street is via Fairfield Road to the east and High Street to the west, as the closest road that connects both streets (Kelley Drive) is a winding residential road.

The area immediately east of the Musselman USARC and across Fairfield Road is primarily residential, with detached single-family houses. The John F. Kennedy Park is located approximately 1,500 feet to the southeast. Most of the area to the immediate northwest, across Sandy Hill Road, also contains single-family houses, with apartment complexes beyond. The area south of the Musselman USARC (between Sandy Hill Road and East Main Street) contains townhouses.

The Musselman USARC is currently being used approximately 24 days per month. Its current use for primarily administrative and maintenance functions does not represent a significant impact on traffic or other community resources. It is isolated from public transit and major highways, as discussed in Section 3.2, making it a less attractive site for non-local businesses considering moving to the area.

## 4.2 COMMUNITY OUTREACH

A listing of the surplus property was published by the Department of the Army in the Federal Register on April 21, 2008. As listed by the Army, the property consisted of about 3.45 acres of land and 39,000 square feet of buildings. The Federal Register notice formally recognized the Musselman USARC LRA, and identified Mr. Steven Nelson (Director of Policy for Montgomery County) as the LRA authorizing official. The LRA was charged with building consensus around a facility redevelopment plan that balances Norristown Municipality and community needs and serves as a guide for environmental analysis and property disposition by DOD.

The LRA conducted substantial public outreach (Attachment 1). During the planning phase, the LRA worked with the immediately impacted communities through the Norristown Community Council and Plymouth Township Council. Two joint meetings were held to inform the public of the BRAC process and gauge community sentiment. Members of Montgomery County government and the LRA attended and participated in both meetings.

On May 20, 2008, the *Times Herald* (a Norristown Municipality newspaper) published an announcement (legal notice) of the availability of surplus Federal property (i.e., the Musselman USARC) to State and local eligible parties, including homeless service providers. The announcement stated that the Musselman LRA was seeking notices of interest (NOIs) for surplus property at the installation. The NOIs for homeless assistance could be submitted by any State or local government agency or private non-profit organization that provides, or proposes to provide, services to homeless persons and/or families residing in Montgomery County. The announcement noted that a Public Outreach Workshop would be held on July 8, 2008. Attendance at the workshop was not required to submit an NOI, but was highly encouraged.

The newspaper announcement summarized the information that should be included in the NOIs from homeless service providers and other entities. The announcement stated that entities interested in obtaining the Musselman USARC through a public benefit conveyance (PBC) other than a homeless assistance conveyance, were invited to contact appropriate Federal agencies to find out more about each agency's PBC program. The Federal agencies referenced included the U.S. National Park Service (for parks and recreation); the U.S. Department of Education (for education), the U.S. Department of Health and Human Services (for public health); the U.S. Department of Justice (for corrections and law enforcement); the U.S. Department of Housing and Urban Development (for self-help housing); the regional Federal Aviation Administration (for public airports); the U.S. Department of Transportation (for port facilities); the Federal Emergency Management Agency (for emergency management); and the U.S. Army (for historic monuments and wildlife conservation).

The legal notice stipulated that the LRA should receive NOI submissions by September 10, 2008.

On July 8, 2008, the BRAC Public Outreach Workshop was held at the Montgomery County Human Services Center in Norristown, Pennsylvania. The agenda included a discussion of the outreach and facility redevelopment planning process, an overview of the BRAC process, an exchange of information regarding the Musselman USARC, a questions and answers period, and a tour of the property. A total of 7 people attended, including representatives from Norristown Municipality, Montgomery County Housing Department, U.S. Army Reserve higher headquarters (99<sup>th</sup> Regional Readiness Command or RRC) for the Musselman USARC, Department of Defense Office of Economic Adjustment (DOD-OEA), and the Pennsylvania Business Development Corporation (PBDC). Mr. Garry Gontz of DOD-OEA facilitated the BRAC Public Outreach Workshop.

On July 30, 2008, a Public Outreach meeting was held at the Montgomery County Human Services Center. The agenda was similar to the BRAC Public Outreach Workshop held earlier in the month. Mr. Gontz of DOD-OEA led the meeting. In attendance were representatives from the Montgomery County Department of Public Safety; the County Department of Housing and Community Development; Norristown Municipality; Norristown Area School District; Continuum of Care; Montgomery County Detectives; Montgomery County Office of Mental Health (OMH); Montgomery County Coordinated Homeless Outreach Center (CHOC); Montgomery County Community Housing Services (CHS); and Fair Housing Rights Center of Southeastern Pennsylvania. With the exception of the Norristown Area School District, none of the other representatives expressed significant interest in redeveloping the USARC property.

A follow-up meeting was held with the community groups in August 2008. At this meeting, members of the planning commission summarized the status of redevelopment planning and answered questions from area residents. Norristown Municipality subsequently sent a letter to Montgomery County stating that the current zoning requirements for the Musselman USARC would not be changed.

On August 13, 2008, the LRA held their first meeting to discuss the purpose of the LRA, the timetable for redevelopment planning, and other business. MCPC provided a review of the BRAC process to date. Attendees included representatives from the MCPC, NASD, Montgomery County Continuum of Care, and Norristown Municipality.

On August 19, 2008, a tour of the Musselman USARC was conducted. In attendance were staff members from the Montgomery County Office of Behavioral Health and Resources for Human Development (RHD); Montgomery County CHOC; MCPC; the Army (99<sup>th</sup> RRC); Montgomery County OMH; Montgomery County CHS; Montgomery County's District Attorney Office; and Valley Youth House

(VYH). The CHOC serves homeless individuals that reside throughout Montgomery County regardless of race, gender, national origin, religious affiliation, or sexual orientation. CHS provides resources, crisis intervention, and long-term housing for the homeless and near homeless, and assists victims of domestic violence and single displaced men. VYH provides prevention/intervention services, counseling, life skills and behavioral health services to abused, neglected, and homeless youth and their families. Again, none of these agencies indicated potential interest in redeveloping the property.

LRA meetings were also held on December 17, 2009, January 15, 2010, February 5, 2010, and March 12, 2010 at the Montgomery County offices. Local municipal, Township, Federal, and County representatives attended the LRA meetings. The LRA served to ensure that the BRAC process moved forward fairly and with the support of local political representatives and government agencies.

On February 1, 2010, the *Times Herald* published a notice announcing a public hearing to discuss the draft redevelopment plan. The notice indicated that copies of the redevelopment plan were available for public review at the Montgomery County Planning Commission (MCPC) Office, at the Montgomery County Norristown Municipal Library, and at the Norristown Municipal Building. The plan was available for review at these locations from February 1 to February 12, 2010. The LRA also mailed announcements of the public hearing to nearby residents near the Musselman USARC.

Due to a snowstorm, the public hearing was delayed one week, and a second notice was published by the *Times Herald* on February 15, 2010. Approximately 30 people attended the hearing. A transcript of the public hearing (meeting) was recorded by a stenographer, and is provided as Attachment 5.

The hearing was held on February 18, 2010 at the Musselman USARC property. During the hearing, LRA representatives discussed the BRAC process, reviewed the preferred redevelopment plan for the property, and answered questions from the community. Approximately 30 people attended the hearing.

## **5.0 NOI SUBMISSIONS**

The MCPC/LRA sent out instructions for completing NOIs on May 20, 2008. Parties interested in obtaining the Musselman USARC under federal BRAC provisions for a homeless assistance conveyance or public benefit conveyance were requested to submit an NOI. Only the Norristown Area School District (NASD) submitted an NOI.

On October 30, 2006, NASD submitted an application for the acquisition of the Musselman USARC to the U.S. Department of Education. The District expressed interest in acquiring the property once it was

identified as surplus Federal property as part of the BRAC 2005 legislation. The application was prepared well before the request was announced for NOI submissions through the May 2008 legal notice.

The LRA performed a detailed analysis of the NOI originally submitted by NASD, as well as the NASD revised application that was submitted to the U.S. Department of Education in January 2010. The analysis included: (1) review of the proposed use in terms of spatial needs and likely configurations for the property; (2) potential conceptual designs of the proposed use; and (3) cost estimates to implement the conceptual design of the proposed use. The review considered:

- Strength of the NOI
- Its compatibility with property (including environmental and community impacts)
- Feasibility (including eligibility for public benefit conveyance)
- Compatibility with municipal/township and neighborhood plans
- Broad community support

## **5.1 NOI APPLICATION**

In its October 2006 application, NASD indicated that they would use the property to support their secondary education reform movement, which was intended to shift the existing high school to Small Learning Communities (SLCs). The two Musselman USARC buildings would provide the District with more than 39,000 square feet in space.

NASD encompasses several communities in central Montgomery County, including the Municipality of Norristown, the Township of East Norriton, and the Township of West Norriton. The Musselman USARC is situated in the eastern end of Norristown Municipality, where NASD does not have an existing elementary or secondary education facility within the District's boundary.

On April 11, 2007, the U.S. Department of Education approved the NASD application to acquire the property for creating an SLC school for Grades 9 - 12 and for the high school Junior Reserve Officers Training Corps (JROTC) Program. The Department of Education also requested assignment of the property from the U.S. Army to NASD at a 100% public benefit allowance discount. The Department noted that the property was not scheduled to close until 2011.

On April 28, 2007, the U.S. Department of Education notified the LRA point of contact (Mr. Steven Nelson) that the Department had approved an educational PBC for NASD to acquire the property.

Subsequent to the April 2007 notification, the NASD reevaluated its facility needs in response to new academic initiatives, guidance from the new School District Superintendent, and a Feasibility Study which performed a more detailed evaluation of current and planned educational programs and space needs. The detailed evaluation examined projections for student enrollment, which indicated that the elementary school population (including pre-kindergarten and kindergarten students) was expected to significantly increase by 10 to 20 percent over the next 10 years.

In response to the Feasibility Study findings, NASD submitted a revised application to the U.S. Department of Education in January 2010. While the application called for an educational public benefit conveyance with respect to the Musselman USARC, the property would not be planned for secondary educational purposes or as a Small Learning Community. Rather, the USARC would be used as a kindergarten center, with up to 10 full-day classes.

## **5.2 NOI DESCRIPTION**

The original NOI submitted planned to use the Musselman USARC as part of the conversion of the high school to an SLC system. Each SLC would house between 300-350 students and 15 teachers, who would be assigned to each thematic community, with their individual identity (e.g., Career, Business and Finance, Engineering and Technology, Health Sciences, Law and Criminal Justice, Performing Arts, and Visual Arts). As part of the NASD application, one SLC would be located at the Musselman USARC.

The main building at the property would be used for classroom instruction, Monday through Friday during normal school hours. There would be limited evening classes, and evening and weekend extracurricular activities. Since major renovation would not be required, NASD estimated that the property would be compliant and available for student occupancy in 6-12 months. No existing buildings at the Musselman USARC would be demolished; however, some renovations would be made inside the main building, specifically for modifying classrooms and office administrative space.

The smaller garage at the property would be used to house the Norristown Area High School (NAHS) JROTC Program, which is an active program. The garage would be used primarily for storage.

As part of the January 2010 revised application submitted by NASD, the USARC would be used as a kindergarten center, with up to 10 full-day classes. Between 300 and 350 children would attend the school along with a small number of teachers and support staff estimated between 14 and 18 people. The main building and garage at the USARC would be used in a manner similar to the SLC concept; however, the JROTC Program would not be housed in this facility.

The January 2010 application estimated that the USARC structures could be converted to a kindergarten center within 1 year after acquiring the property. Major structural renovations would not be required. Existing administrative offices and classrooms would be established in a manner generally consistent with the current layout of the main building (Figures 4 and 5). Minor renovations and facility improvements would be made to:

- Establish up to 12 classrooms, 1 library, and several smaller offices.
- Furnish the center.
- Repaint walls and ceilings.
- Provide or update flooring and carpeting.
- Convert the existing drill floor to a combination gymnasium/cafeteria.
- Update the information technology (IT) capabilities of the main building with respect to computers, telephones, and other IT needs.
- Upgrade or modify other areas to accommodate children, teachers, and support staff (e.g., restrooms, faculty areas).

The costs of these renovations and improvements were estimated as roughly \$500,000 by NASD. Annual maintenance costs, including all utilities and up to two full-time custodians, were projected as \$265,000 for the first full year of occupancy. The primary cost components would include custodial services, maintenance and repairs, and maintenance contracts. The most significant utility cost would be related to the use of natural gas to heat the main building. Current projected maintenance costs, as estimated by the Army, are approximately \$120,000 for Fiscal Year 2010.

### **5.3 NOI ANALYSIS**

The proposed land use, a school, would be appropriate to the property's surroundings, which is currently zoned as a Commercial-Retail district. The Musselman USARC is included in Norristown Municipality's overlay zoning district that permits institutional and educational facilities and accessory complimentary services. School uses are generally appropriate and compatible in relation to a residential community.

The potential effects of the NASD proposal to use the USARC as a kindergarten center (or for other elementary school programs) are expected to be negligible. Environmental impacts (e.g., wildlife, water, air quality, noise, stormwater runoff, sewage, generation of wastes and debris) should be minimal since the property will retain its basic structure and physical attributes. No new building construction is planned

at the property although interior spaces will be altered and modified to accommodate elementary school programs.

The impacts on adjacent land use are expected to be minimal. With respect to traffic impacts, up to six school busses would be used to transport elementary students to and from the USARC facility on a Monday-Friday basis at pre-determined times. The approximate number of staff vehicles that would be parked at the property may range from 14 to 18, in addition to vehicles belonging to visitors. The existing POV parking area on the eastern side of the main building has the capacity to handle about 15 vehicles with considerable overflow parking at the back of the USARC property near the garage building.

The change in daily traffic at, and near, the property is expected to be low. The existing roadways should experience the same traffic flow. The nearest major intersection (Sandy Street/Sandy Hill Road and Fairfield Road/East Fornance Street) near the northeast corner of the property is controlled by a traffic light. There appears to be no requirement to improve vehicular access to the property if it is used as an elementary school.

Based on the NOI analysis, nearby communities would suffer minor negative economic impacts from the loss of the Musselman USARC and the small number of full-time military employees that support the local economy. The property is located in the eastern end of the Norristown Municipality where no current NASD school exists. Nearby students are currently bussed to elementary schools in surrounding townships (i.e., East Norriton and West Norriton) several miles away. The presence of a new elementary school at the USARC property would provide an accessible facility near several neighborhoods for students, parents, and guardians, and would help alleviate the overcrowding of existing NASD schools.

The NASD proposal generated only a few concerns based on review by community:

- Traffic generation during peak operating hours
- Concerns about the behavior of secondary students in the community before and after school hours

As previously discussed, changes in daily traffic near the USARC property are expected to be low. The NASD proposal includes provisions for full-time custodial staff. The concerns regarding secondary student behavior are no longer valid since the property would be used for elementary students, including children of kindergarten and pre-kindergarten ages.

## 6.0 RECOMMENDATIONS

### 6.1 LRA RECOMMENDATION

The LRA recommends the conveyance of the Musselman USARC to the Norristown Area School District for use as a new elementary school. This is the preferred redevelopment plan for the following reasons:

**Feasibility:** The NASD proposal is physically and financially feasible, and meets the LRA goals for planning the redevelopment of the property.

**Notice of Interest (NOI):** While only one NOI was received in response to the LRA request for NOIs, the original NASD application (October 2006) submitted to the U.S. Department of Education was a complete and detailed description of the District's proposed reuse of the property. The revised application (January 2010) was also thorough and supported by an independent Feasibility Study regarding NASD facilities and student population projections.

**Impacts on Adjacent Land Use, Environment, Local Economy, and Traffic:** The NASD proposal for redevelopment of the property is similar to those USARC activities for which the community and nearby neighborhoods are already accustomed. These activities have included educational, administrative, and logistical support functions on behalf of service members. The USARC has typically been manned by a small, full-time staff of up to 12 people, with reservists assembling on weekends or weeknights for training, exercises, and planning sessions. The USARC historically has handled up to 200-250 people and their equipment (including vehicles), based on the types of military units that have occupied the property. Impacts on land use, the environment, the local economy, and traffic patterns are expected to be minimal.

**Community Support:** The immediately adjacent communities to the USARC facility have not yet expressed their preference for the property to be used by the NASD. The community preference may be relevant to the need for local support of a zoning change or variance to enable redevelopment of the property, if required.

### 6.2 OTHER RECOMMENDATIONS

The USARC property has an excessive amount of paved areas, which are currently being used for parking military vehicles, other military equipment, and civilian vehicles. The LRA has suggested that these paved areas, if not essential to the redevelopment plan, should have provisions for new landscape enhancements (e.g., green buffers) consistent with the operational requirements of the user. These

enhancements could include the planting of trees along the western property boundary, and small islands of shrubs and other vegetation to break up the appearance of the parking lots. The paved areas could be improved with better lighting.

The former coal room located along the south side of the main building at the USARC, which is in a state of disrepair, should be equipped to limit access (i.e., locked door). Prior to transfer of the property, the new user should request that DOD demolish the interior of this room to eliminate any potential hazards.

The NASD proposal did not provide a specific use for the large storage area adjacent to the gym/cafeteria. This area is currently windowless, but could be converted into additional classrooms or a multi-purpose area.

## **7.0 RESPONSE TO PUBLIC COMMENTS**

The LRA met the citizen participation requirements with respect to redevelopment planning for the Musselman Memorial USARC as follows:

- Made the draft redevelopment plan available for public review and comment at three locations during the period from February 1 to February 12, 2010.
- Conducted one public hearing on the draft redevelopment plan on February 18, 2010 at the Musselman USARC.
- Summarized public comments received during the development of the plan.
- Documented the citizen participation process that the LRA followed.

At the February 18, 2010 public hearing, two comments were noted. The President of the Norristown Municipal Council stated that the Council was strongly in favor of the preferred re-use plan with the caveat that the property be maintained as an elementary school program, and not for secondary education. One citizen urged the LRA to consider the property for use as a law enforcement headquarters where local, county, and state police members (as well as homeland security specialists) could be stationed. This citizen provided a detailed explanation as to why the property was well suited for this purpose. A transcript of the meeting is provided as Attachment 5. No other public comments were received for the redevelopment plan.

With respect to the comment regarding the use of the Musselman USARC property as a law enforcement headquarters, the LRA sent out instructions for completing NOIs on March 20, 2008, and requested that

the NOIs should be submitted by September 10, 2008. Several public outreach workshops and meetings were held in July and August 2008 to solicit community involvement. One meeting was attended by a representative from the Montgomery County Detectives. Despite the efforts of the LRA, however, law enforcement agencies did not express interest in redeveloping or acquiring the property.

Section 5.3 summarizes two additional comments regarding the original NASD proposal. The concern about the behavior of secondary students is no longer valid.

As discussed in Section 5.3, changes in daily traffic near the property are expected to be low. The average daily traffic count for Sandy Street was less than 7,000 vehicles in 2009.

Following the February 18, 2010 public hearing, Norristown Municipality contacted the LRA and noted that they were not in favor of school buses being stored or parked overnight at the Musselman USARC property. NASD indicated that their proposal does not include this type of plan; busses will continue to be parked at the NASD Administration Building on North Whitehall Road.

## **8.0 REFERENCES**

Montgomery County Planning Commission, 2010. <http://planning.montcopa.org/planning>.

Municipality of Norristown, 2008. Community Development Consolidated Action Plan 2005 – 2009.

Municipality of Norristown, 2009. Norristown Economic Revitalization Strategy Update. June.

USACE (U.S. Army Corps of Engineers), 2007. Final Environmental Condition of Property Report, 1LT Ray S. Musselman Memorial U.S. Army Reserve Center. February.

## **FIGURES**

**ATTACHMENT 1**  
**PUBLIC PARTICIPATION**

**ATTACHMENT 1**  
**PUBLIC PARTICIPATION**

<b>YEAR</b>	<b>DATE*</b>	<b>DESCRIPTION</b>
2005	--	Property declared as surplus by DOD during BRAC 2005 legislation
2007	September 12	Montgomery County Board of Commissioners pass a resolution to establish a Local Redevelopment Authority for the Musselman USARC property
2008	February 19	Montgomery County requests DOD to recognize the LRA
2008	April 21	Federal Register notice recognizing the Musselman Memorial U.S. Army Reserve Center Local Redevelopment Authority
2008	May 20	Legal notice published announcing availability of surplus Federal property, which requested Notices of Interest (NOIs) from eligible parties
2008	July 8	BRAC Public Outreach Workshop held
2008	July 30	Public Outreach Meeting held
2008	August	Follow-up meeting held with community groups
2008	August 13	First LRA meeting held
2008	August 19	Tour of Musselman USARC conducted
2008	September 10	Deadline for NOI submissions
2009	June 7	Original DOD deadline for submitting the redevelopment plan and homeless assistance submission
2009	October 20	DOD extends deadline for the LRA to submit a redevelopment plan and homeless assistance submission to March 31, 2010
2009	December 17	Second LRA meeting held
2010	January 15	Third LRA meeting held
2010	February 1	Notice published announcing public hearing to discuss the Musselman USARC draft redevelopment plan; start of public review period for draft plan
2010	February 5	Fourth LRA meeting held
2010	February 12	End of public review period for draft redevelopment plan
2010	February 15	Notice published announcing new date for public hearing
2010	February 18	Public hearing held
2010	March 12	Fifth LRA meeting held

**ATTACHMENT 2**  
**MUSSELMAN USARC CHRONOLOGY**

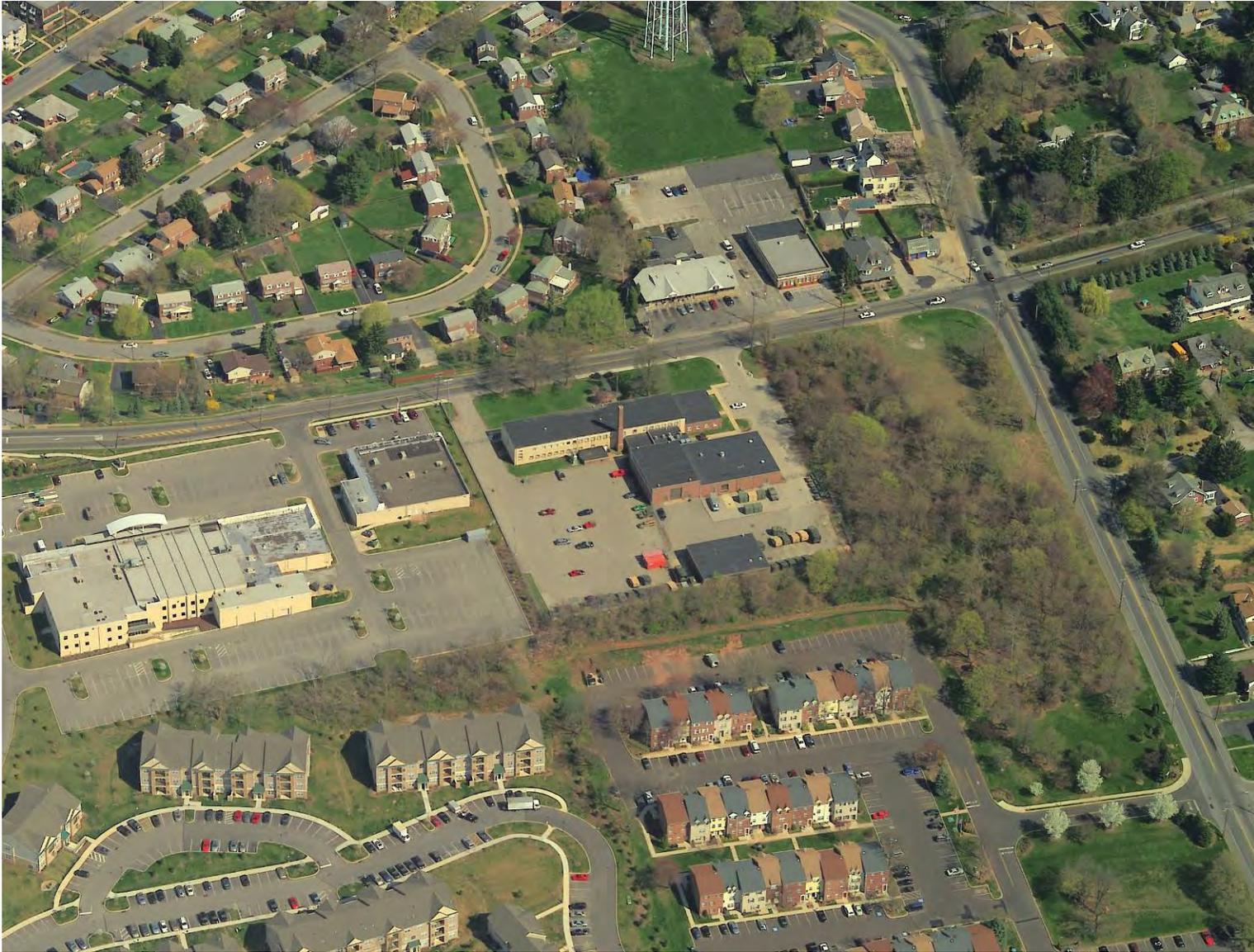
**ATTACHMENT 2**  
**MUSSELMAN USARC CHRONOLOGY**

<b>YEAR</b>	<b>DATE*</b>	<b>DESCRIPTION</b>
1955	--	Land purchased by US Government
1958	--	Main building constructed
1959	--	OMS constructed
1975	--	Facility renovation including ceiling, lights, floor tiles, hot water heater, electrical systems
1986	--	Paving and sidewalks upgraded
1990	August 2	Facility directed to remove any USTs in accordance with state regulations
1990	--	Facility doors replaced
1992	April 24	Subcontractors directed to remove any asbestos-containing floor tiles
1993	--	HVAC system upgraded
1995	--	Roof replaced
1995	April 2-6	Transformer survey report completed
1995	--	Radon Compliance Report completed
1995	July	Cultural Resource Management Plan Report completed
1995	August 1	Programmatic Natural Resource Management Plan
1995	--	Inventory of Significant Biological Resources completed
1997	--	Facility windows replaced
1998	June 29	Air emission source inventory complete
2000	February 1	Engineering and Environmental Facility Assessment completed
2000	September 22	Cross-Connection Control Survey completed
2001	January 24	OWS Survey Report confirmed that an OWS did not exist at the property
2003	July	Range Cleanup Report completed; former range area was safe for use
2005	May 13	BRAC list (round 5) published; included Musselman USARC
2006	October 30	NOI submitted by NASD
2006	--	465 <sup>th</sup> Transportation Company and 444 <sup>th</sup> Human Resources Company move in
2007	February	Environmental Condition of Property report prepared
2007	September 12	Montgomery County Board of Commissioners passed a resolution to establish an LRA
2007	April 11	U.S. Department of Education approved NASD application
2008	March	Secretary of Defense approved LRA
2008	April 28	U.S. Department of Education notified LRA of NOI approval
2008	May 20	Legal notice of availability of Musselman USARC as surplus government property
2008	July 8	BRAC Public outreach workshop regarding Musselman USARC
2008	July 30	Public outreach workshop regarding Musselman USARC
2008	August 13	First LRA meeting
2008	August 19	LRA tour of Musselman USARC facility
2009	December 17	Second LRA meeting
2010	January 6	Revised NOI submitted by NASD
2010	January 15	Third LRA meeting
2010	February 1	Legal notice of public hearing on redevelopment plan
2010	February 5	Fourth LRA meeting
2010	February 15	Notice published announcing new date for public hearing
2010	February 18	Public hearing on redevelopment plan
2010	March 12	Fifth LRA meeting
2010	March	Redevelopment plan and homeless assistance submission finalized for review

\*Date listed if available

**ATTACHMENT 3**  
**MARKET ANALYSIS**

**ATTACHMENT 4**  
**SITE PHOTOGRAPHS**



*Musselman USARC property (in center of photograph) looking toward the north.*



*Musselman USARC property (in center of photograph) looking toward the south.*



*Musselman USARC front entrance*



*Musselman USARC Exterior Drill Floor*



*Rear of Musselman USARC Main Building*



*Musselman USARC Drill Floor Interior and Kitchen Area*



*Musselman USARC Parking Area*



*Musselman USARC Garage*



*Musselman USARC Main Lobby*



*Typical Hallway at Musselman USARC*



*Typical Classroom at Musselman USARC*



*Musselman USARC Entrance Sign*

**ATTACHMENT 5**  
**PUBLIC HEARING TRANSCRIPT**

MONTGOMERY COUNTY

PUBLIC MEETING

REDEVELOPMENT PLANNING UPDATE

1LT Ray S. Musselman Memorial

U.S. Army Reserve Center (USARC)

- - -

Thursday, February 18, 2010

Norristown, Pennsylvania

- - -

Public Meeting taken pursuant to notice, at 1020 Sandy Hill Road, on the above date, beginning at approximately 7:00 p.m., before Jennifer Miller, Professional Shorthand Reporter and Notary Public.

- - -

## APPEARANCES:

NEIL TEAMERSON, Tetra Tech NUS, INC.

MONA GARRETT, Base Transition Coordinator

ANNE MARIE ROHRICHT, PRSBA

STEVEN L. NELSON, AICP

JEAN HOLLAND, Montgomery County Planning  
Commission

(Index at end of transcript.)

1 MONTGOMERY COUNTY

2 MR. NELSON: Good evening,  
3 Ladies and Gentlemen, if I can have your  
4 attention.

5 Thank you all for coming out  
6 tonight. My name is Steve Nelson. I'm  
7 with Montgomery County. And I am the  
8 chair of the Local Reuse Authority, and  
9 we are the ones who are holding the  
10 public meeting tonight.

11 So we have a presentation for  
12 you, which should take 15 or 20 minutes  
13 or so, and then we will get to the  
14 comment period.

15 And the purpose of tonight's  
16 meeting is to take your comments on this  
17 proposed reuse plan, which you will hear  
18 about in a few moments.

19 Tonight's meeting is intended  
20 to provide the opportunity to give input  
21 on this.

22 We have a court reporter here  
23 tonight, who's taking notes for our  
24 records. And your comments -- if you  
25 have questions, they will be answered.

## 1 MONTGOMERY COUNTY

2 If you have comments, they will be  
3 recorded as part of the official record.  
4 And I'll get into a bit more about what  
5 the process is.

6 But tonight is intended for  
7 your comments on the plan. If there's  
8 some questions, we may be able to answer  
9 them.

10 But this isn't intended to be a  
11 question-and-answer period, but rather an  
12 opportunity for the public to present its  
13 comments in essence to the Local Reuse  
14 Authority, and also to the federal  
15 government departments that are going to  
16 be reviewing this reuse plan.

17 So it's all about, of course,  
18 the Lieutenant Ray S. Musselman, U.S.  
19 Army Reserve Center.

20 I should mention as way of  
21 introduction the other members of the LRA  
22 that are here tonight. Ann Marie  
23 Rohricht from the School District is  
24 here. Ken Hughes from Montgomery County  
25 Planning Commission is here. Kathy

1 MONTGOMERY COUNTY

2 Phiifer from the County of Department of  
3 Housing and Community Development, and  
4 Jim Saring representing Plymouth  
5 Township.

6 MR. DIMINO: I want to  
7 represent the Borough of Norristown.

8 MR. NELSON: Well, thank you.  
9 I was introducing the members of the LRA.

10 MR. DIMINO: Oh, okay.

11 MR. NELSON: And Bill Presion  
12 (ph) is the other member of the LRA.  
13 He's representing Norristown, and he's  
14 also a Norristown counsel person.

15 I should also mention we have  
16 some help from Mona Garrett, who is a  
17 liaison to the Army; Jean Holland, the  
18 County Planning Commission staff person;  
19 and Neil Teamerson is from Tetra Tech,  
20 who is the consultant that has been hired  
21 to help us with this process.

22 So I'll go through these items.  
23 Obviously, the reuse plan is probably of  
24 the most interest to you folks. And then  
25 we'll get to the public comments.

1 MONTGOMERY COUNTY

2 The redevelopment plan you're  
3 going to hear tonight has been prepared  
4 under the direction of the LRA by our  
5 consultant, and we are following the  
6 federal process.

7 As many of you I'm sure already  
8 know, this Army Reserve Center was placed  
9 on the closure plan that was adopted by  
10 congress in 2005, I believe, so-called  
11 BRAC process, B-R-A-C.

12 Everything that we have done  
13 this hearing, this meeting tonight,  
14 everything going forward up until the  
15 transfer of the land, is all done under  
16 the federal regulations.

17 So the federal regulations  
18 require us to balance the needs of the  
19 homeless with other needs. The plan  
20 itself is then used for the disposition  
21 of the property. And I'll get into that  
22 in just a moment.

23 And the plan itself is  
24 submitted to the Department of Defense  
25 and to the Housing and Urban Development

## 1 MONTGOMERY COUNTY

2 Department, the federal government, with  
3 a homeless assistance submission. And,  
4 again, this is required under the federal  
5 law.

6 The plan itself, like all  
7 plans, should be representing what the  
8 community feels is important. This has  
9 been done through the various  
10 representatives.

11 We've had Norristown  
12 representatives, as I mentioned.  
13 Plymouth has representatives because this  
14 property lies in both municipalities.  
15 And the redevelopment plan is then used  
16 by the Army, which determines then what  
17 the future use of the land will be.

18 The planning process itself, we  
19 looked at goals and objectives; we looked  
20 at the conditions here on this  
21 approximately two-acre site.

22 This meeting tonight is part of  
23 our public outreach. We also did  
24 intensive public outreach about a year  
25 and a half ago.

1 MONTGOMERY COUNTY

2 We had a tour of this by  
3 various groups that were interested in  
4 potentially reusing it. In this case,  
5 special studies were not required.

6 And we are now going to be  
7 ready to present to you and then to the  
8 federal government this final preferred  
9 reuse plan.

10 So there are many different  
11 ways that the Army can dispose of this  
12 property, can transfer this property.

13 DOD is Department of Defense.  
14 It can be given to DOD or another federal  
15 agency.

16 There can be what's called an  
17 economic development conveyance for  
18 developing purposes. There can be an  
19 actual sale to a public entity. There  
20 could be a public bid process.

21 And then lastly, there's called  
22 what's a public benefit conveyance. And  
23 the purpose there is for the service  
24 branch, in this case the Army, to convey  
25 the property for any one of these

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2 purposes, which are all for public  
3 benefit.

4 And what you will hear about  
5 tonight in more detail is a public  
6 benefit conveyance for educational  
7 purposes.

8 Once the meeting tonight is  
9 completed, we will then move forward and  
10 take your comments, incorporate them in  
11 the final plan with a homeless submission  
12 package, and that is sent off to the  
13 Housing and Urban Development and to the  
14 Army.

15 I should mention that as part  
16 of the outreach process, we contacted  
17 homeless service providers in the area,  
18 and they were given the opportunity to  
19 submit any interest for this property.

20 We did not receive any interest  
21 from the homeless providers. So that the  
22 homeless submission package recognizes  
23 that; but in case anyone is interested or  
24 sees homeless and wonders about how that  
25 fits in here, that's part of the federal

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process.

But, again, the refuse plan as you see does not involve providing any services or any services for the homeless.

The next step then is HUD has to accept it, and then it comes back really to Norristown and the small piece of property that's in Plymouth.

So the reuse plan you see tonight is a plan; it's not a development project. It doesn't convey approval of anything, because that is Norristown counsels' sole responsibility.

So what you're going to see tonight is really the first step in the redevelopment of this building. But the redevelopment of the building, the reuse of the building, and the property has to conform to local zoning, to local subdivision ordinances, and then is approved by municipal counsel.

So next slide, this is the timetable. I mentioned some of these

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2 things already.

3 November is when they announced  
4 the closure of this base and many others.  
5 The LRA was recognized. We've gone  
6 through workshops and tours.

7 The draft plan was made  
8 available and advertised. We are  
9 now really in this February time period  
10 for the public comments.

11 That will be -- the final plan  
12 will be available in March. And then  
13 November 2011 is the federal deadline for  
14 when this facility must be vacated  
15 entirely.

16 Okay. So the next speaker will  
17 be Anne from the School District. Were  
18 you going to cover this?

19 MR. TEAMERSON: Very briefly,  
20 I'm Neil Teamerson.

21 As Steve said, it's about a  
22 three-and-a-half-acre property. We're in  
23 the main building. Nearly more than  
24 35,000 square feet, primarily classroom  
25 type of environment, administrative space

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2 for a small, full-time staff for the  
3 military during Monday through Friday.

4 And then one weekend a month it  
5 gets a bit crowded there. It's been like  
6 that for the last 50 years, actually.

7 Most of the land, as Steve  
8 indicated, is within Norristown  
9 municipality. The small corner back here  
10 is in Plymouth Township property.

11 Environmental conditions are  
12 acceptable here. The Army did a what's  
13 called an environmental conditions  
14 property report back in July of 2007.

15 It looked at everything you  
16 could look at with respect to the  
17 environmental health and condition of  
18 this property: asbestos, lead-based  
19 paint, Radon, indoor air quality,  
20 underground storage tanks, all those type  
21 of things; water, infrastructure, sewers,  
22 and that type of thing.

23 So the Army did a little  
24 investigation in December to answer  
25 unresolved questions about a possible

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2 buried underground storage tank for fuel  
3 oil. I think that's pretty much been  
4 rectified. And the property does have a  
5 good, clean bill of health.

6 Just a little bit -- you're not  
7 familiar with it. This might be hard to  
8 see after the formal part of this.  
9 There's actually some posters over here  
10 that looks better.

11 This is looking to the north.  
12 Or actually, this is Sandy Hill or Sandy  
13 Street. You can see that we're currently  
14 in the classroom right here.

15 Most of you tried to find a  
16 place to park on that side of the  
17 building. A lot of parking primarily for  
18 the military vehicles, wheeled vehicles  
19 that are here.

20 There is a small organizational  
21 maintenance shop, two vehicle bays where  
22 they do basically light vehicle work:  
23 change tires, oil, not major repairs on  
24 the military equipment.

25 The unit that is currently

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2 here, one is a transportation company,  
3 one is currently a human resources  
4 company.

5 In the past, historically this  
6 has been the home of the Civil Affairs  
7 Brigade, the 358, as well as the 416  
8 Civil Affairs Battalion.

9 And those units were relocated  
10 two and a half years ago to California.  
11 This is one of the reasons this property  
12 has been declared as excess or surplus  
13 federal property.

14 And just a view in the other  
15 direction, you can kind of -- it looks a  
16 little bit different without the snow,  
17 right?

18 MR: NELSON: Anne.

19 MS. ROHRICHT: Thank you. I'm  
20 Anne Rohricht. I work for the Norristown  
21 Area School District.

22 The Norristown Area School  
23 District back in 2006 had submitted an  
24 application for the property. We're  
25 interested in reusing the property for an

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2 elementary site.

3 We're going to talk a little  
4 bit about the needs that we have and our  
5 proposal in the next few slides.6 Before we begin, I do just want  
7 to take a minute to recognize the people  
8 from our district that are here tonight.9 We have several school board  
10 members. Briefly, we have Janise Pearce,  
11 our president; Dr. Mauthe; Mrs. Pearl  
12 Smith; Mike Howell.13 In the back, I think I saw  
14 Susan Morrison-Bellamy, Karen Shanoski,  
15 and Pam Assenmacher.16 We also have Bob Malkowski, our  
17 director of operations, who helped with  
18 the plan. He can answer questions about  
19 the floor plans when we get to them.20 And someone from our  
21 solicitor's office, Barbara Kirk, is in  
22 the room, as well.23 So the School District is well  
24 represented tonight. For those of you  
25 that want to have individual discussions,

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2 we hope to be able to answer any  
3 questions that you have.

4 As shared, Norristown Area  
5 School District is interested in using  
6 Musselman as an elementary site. Our  
7 immediate need is for a kindergarten  
8 center.

9 We would also hope in the  
10 future to expand it to include some  
11 pre-kindergarten classes, certainly as  
12 funding allows, but most immediately we  
13 need space for our full-day kindergarten  
14 program.

15 We're currently experiencing  
16 overcrowding, which according to a  
17 feasibility study that we performed is  
18 going to continue, and is going to worsen  
19 greatly over the next ten-year period.

20 Again, you know, talking about  
21 our full-day kindergarten program, how  
22 important it is to the Norristown Area  
23 School District, it was implemented in  
24 2003.

25 And our physical space

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2 constraints are now becoming detrimental  
3 to the program.

4 We have some class sizes in our  
5 full-day kindergarten program with 25  
6 students, which according to everyone in  
7 education is certainly not ideal or  
8 educationally sound.

9 Again, continuation of our  
10 full-day kindergarten program is crucial  
11 to the continuation and successes of the  
12 Norristown Area School District.

13 Here we're talking about some  
14 of the specific numbers that we felt we  
15 needed to share with you.

16 This talks about elementary  
17 enrollment projection and the trends that  
18 are going to occur in the Norristown Area  
19 School District.

20 In 2007, 2008, our K-to-four  
21 enrollment was about 2600 students. In  
22 2009 to 2010 school year, for right now  
23 our K to four has jumped to nearly 2800  
24 students.

25 Our feasibility study and

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2 suggestion trends indicate that by the  
3 year 2018, 19, we will be between 3017  
4 and 3600 elementary students alone.

5 Our current facilities has the  
6 ability to hold 2600 students. So, as  
7 you can see, we're already overcrowded.

8 We're already are five classes  
9 rooms short, which, again, is causing us  
10 to deal with large class sizes and  
11 inadequate learning spaces.

12 The ten-year projection  
13 indicates that we will be 20-plus  
14 classrooms short if we don't address the  
15 needs and expand our facilities.

16 Just another way to look at it,  
17 our current enrollment in grade K to four  
18 is between 500 and 550 students per  
19 grade. The ten-year projection takes  
20 that up to 600 to 700 students per grade.

21 Additionally, those projections  
22 are only K to four. The Norristown Area  
23 School District currently has only one  
24 pre-K classroom.

25 And we hope to have space that

1 MONTGOMERY COUNTY

2 we can expand that program, because we  
3 think it's vitally important to our  
4 elementary education program.

5 Certainly, addressing capacity  
6 issues and discussing construction or  
7 renovation is controversial and can be  
8 extremely costly.

9 You know, people in our  
10 community and our district already know  
11 we are having these conversations. We  
12 started to have some public discussions  
13 of capacity issues at our January school  
14 board meeting.

15 We've already heard many  
16 parents and many staff certainly want  
17 their school renovated. Making decisions  
18 about which building to renovate is  
19 certainly controversial.

20 We've already heard from  
21 taxpayers. Their first concern is how is  
22 it going to impact their tax bill,  
23 because certainly construction is very  
24 costly, and, you know, certainly a  
25 concern to many people.

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2 Currently, there are a couple  
3 of ways we can address our elementary  
4 issues. The traditional way would be to  
5 do construction renovation projects.  
6 Again, that's the costly way.

7 The nontraditional way is what  
8 brings us here tonight. And really what  
9 sparked our interests in the first place  
10 is the cost-effective way to deal with  
11 student capacity issues in our district,  
12 and certainly the way we refer, and we  
13 hope to solicit your support tonight.

14 We've done an extensive look at  
15 Musselman and submitted some extensive  
16 plans about how we would renovate  
17 Musselman and how we would use it.

18 In our opinion, Musselman can  
19 be quickly and economically converted to  
20 classroom space. As shared, it is  
21 already classroom space. Both the first  
22 and second floor of this building are  
23 already typical classrooms.

24 We would look to move eight to  
25 ten kindergarten classrooms very quickly

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1  
2 to the site, if we were granted it.

3 The site can be designed for as  
4 many as 12 to 15 classrooms, depending on  
5 where we would put wall dividers.

6 We would look to move 300 to  
7 350 elementary students to the site, 45  
8 to 18 teachers, and all indications are  
9 that we would have a minimal traffic  
10 impact to the neighborhood.

11 It does not need a significant  
12 level of investment or construction for  
13 renovation. As shared, most of it is  
14 already existing space. We estimate that  
15 it would cost about \$500,000 roughly to  
16 have the facility ready for our needs.

17 Just a quick look at what we  
18 see would be needed. We'd like to do  
19 some preventive maintenance, very  
20 customary, very ordinary to the roof and  
21 mechanical systems.

22 The drill room is where we  
23 would see a cafeteria and the  
24 multipurpose room being suited. And  
25 there is some floor work that needs to be

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done.

As shared, we would need to do relocation and addition of classroom walls. Many of the spaces are like this. They're very large classrooms. Probably too large for a full-day kindergarten program.

We would like to do some painting, carpeting, window treatments on the second floor. The bathrooms would need to be renovated. Most of people are adult bathrooms.

We would need to make sure that they were suited for elementary students. We would like to upgrade some technology, and then we would look to outfit it with furniture and fixtures.

The next two slides are just a quick look at our proposed floor plan. I know they're difficult to see, but they are in your handouts.

On the first floor, I think there are eight classrooms. There's also traditional office space that you would

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2 find in an elementary school, a main  
3 office. I think there's a nurse's  
4 office.

5 Here's the drill room where we  
6 would see the multipurpose room and the  
7 cafeteria. There is already a kitchen on  
8 site with very new kitchen equipment.  
9 It's very suitable for an elementary  
10 cafeteria.

11 Second floor, I think there are  
12 seven classrooms that could be designed.  
13 We would look to have library space on  
14 the second floor, as well.

15 MR. NELSON: Thank you, Anne.

16 Now, we would like to hear any  
17 comments that any members of the public  
18 have about the plan.

19 When you do make your comments,  
20 if you would, come forward to the table  
21 here and give your name so that Jen here  
22 can get it down, and also so she can hear  
23 you so you're not sitting in the back of  
24 the room.

25 Bill Caldwell.

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2 MR. CALDWELL: Good afternoon,  
3 Mr. Chair, and Members of the LRA. Thank  
4 you for hearing us tonight. My name is  
5 Bill Caldwell. I am president of  
6 municipal counsel. I think we are all  
7 comfortable here.

8 You know, first of all, I want  
9 to thank the School District for working  
10 with us and working with you all to put  
11 this plan together. And I really wanted  
12 to voice for counsel our support for the  
13 use of this building as a school.

14 I think that a \$500,000 price  
15 tag for brand new classrooms is  
16 remarkable. And we are very, very  
17 sensitive to the impact on our tax -- on  
18 all of our tax bills.

19 We all live in the municipality  
20 in the School District. That's an  
21 important consideration for us, as well  
22 as for everyone in the district. So, you  
23 know, we are -- my purpose here tonight  
24 is really to let you know that we are in  
25 support of this building being used as an

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2 elementary school, and we would hope that  
3 that will work very well.

4 The only caveat to that is, as  
5 we've been insisting all along, that this  
6 property be maintained as an elementary  
7 school. I think we've been -- you know,  
8 through the discussions, we've been very  
9 clear and adamant about that.

10 And that is our big concern.  
11 And that needs also to be, you know,  
12 stated publicly on the record. We would  
13 appreciate and we would hope for some  
14 form of acknowledgement of that in the  
15 plans as they come before land  
16 development or development before  
17 counsel. And that's really what we're  
18 going to be looking for.

19 So given that piece of it, I  
20 don't see anything that will oppose this  
21 coming from municipal counsel. So thank  
22 you for your time. We appreciate the  
23 effort that all of you have put into  
24 this.

25 Definitely our education is --

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2 certainly pre-K and kindergarten  
3 education is going to be vital to the  
4 citizens in Norristown, and not only the  
5 citizens now, but those that are coming  
6 up in the future. Thank you very much.

7 MR. NELSON: Thank you,  
8 Mr. Caldwell.

9 No one else noted that they  
10 wanted to speak, but I wanted to give the  
11 opportunity to anyone here who did wish  
12 to speak.

13 Yes, sir.

14 MR. DIMINO: I would like to  
15 speak.

16 MR. NELSON: If you would come  
17 forward and either have a seat or stand.  
18 Give us your name.

19 MR. DIMINO: I just heard the  
20 discussion from the president of town  
21 counsel. And I have to object to that  
22 very dearly as a former resident of  
23 Norristown.

24 My name is Gus Dimino. I  
25 served 12 years in the Borough counsel.

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2 I also was a good friend of Lieutenant  
3 Ray Musselman. We played on the same  
4 ball team together in Rittenhouse and  
5 Norristown High School.

6 I was born and educated in  
7 Norristown. I lived here for over 50  
8 years until I was recalled in 1974 to  
9 return to the Army for a ten-year stay at  
10 the age of 54 years.

11 During my term in town counsel,  
12 I was the building chairman for the  
13 construction of the present  
14 administration building on Airy Street.  
15 I also was the chairman of the Sawmill  
16 Run project on Fornance Street.

17 When we decided to build the  
18 administration building on Airy Street,  
19 this building was built to accommodate  
20 only 45 police officers at that time.

21 As chairman of the Sawmill Run  
22 flood control project on Fornance  
23 Street -- I was a member of the Army  
24 Reserve from here -- that we provided a  
25 44-acre playground at that site for over

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1  
2 22 weekends by volunteers from the Army  
3 Reserve, and provided all of the  
4 playground equipment free to the Borough  
5 of Norristown, using this center to store  
6 our equipment, construction equipment,  
7 here over the weekends.

8           You have to bear with me. In  
9 1970, there was a large riot in the  
10 Borough of Norristown. Using this  
11 reserve center as the headquarters for  
12 the county, local and state police as  
13 over a few hundred police officers were  
14 stationed here during that time.

15           And as a supply officer in the  
16 reserves myself, as a chief warrant  
17 officer, I had to go down to South Jersey  
18 to my unit, and acquired a hundred  
19 bullet-proof vests for the police of  
20 Norristown. That's how serious it was at  
21 that time.

22           Also, I must say that part of  
23 my military career, I served in Germany  
24 and Belgium as a first sergeant of a  
25 360th military police company with over

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2 260 MPs that we were patrolling the  
3 war-torn streets of the large cities.

4 Now, the Norristown Police  
5 Department has 70 male and female  
6 personnel with 20 squad cars. The  
7 condition of the police locker room is  
8 undesirable. It has without showers  
9 facilities. Restroom accommodations are  
10 very poor, and only has a powder room for  
11 the female officers.

12 There is at the reserve center  
13 here available for many police cars,  
14 personnel and visitors that would come to  
15 the police department.

16 There is a security area behind  
17 this building for safety of the police  
18 cars and emergency equipment when not in  
19 use. There's plenty of locker room  
20 storage for the police equipment and  
21 clothing.

22 There's a large hall on the  
23 first floor for police training. There  
24 is a security bulk right outside the  
25 hallway here that will store ammunition,

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1 rifles, and equipment, and protective  
2 vests in the event of serious  
3 disturbance.  
4

5 There is available room here  
6 and many offices for the purposes of the  
7 detectives. Right now the detectives are  
8 in a little room with four personnel in a  
9 small room using one desk. That's not  
10 the way to treat the military -- the  
11 police department.

12 There is also plenty of space  
13 to renovate rooms for detainee purposes.  
14 In other words, we can set up eight or  
15 ten rooms for jail for -- to keep people  
16 overnight.

17 There's space available to  
18 accommodate a Homeland Security unit in  
19 this building. There's space available  
20 for the growing sheriff's department of  
21 Montgomery County, if that is necessary.

22 There's a three-bay garage  
23 behind this building for minor repairs,  
24 for tire changing, and cleaning of the  
25 patrol cars.

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2 Now, the highlight of the whole  
3 and wonderful building being available to  
4 Norristown is for over 50 years, the  
5 federal government and the United States  
6 Army paid no taxes to the Borough of  
7 Norristown to the amount of approximately  
8 two and -- two and a half million  
9 dollars. This is why this center  
10 rightfully should go to the Norristown --  
11 no other group can claim that right.

12 There are such operating costs,  
13 expenses as sewage, custodian services,  
14 ground and repair maintenance, snow  
15 removal, maintenance contracts that all  
16 can be handled by the Borough employees.

17 The result of all the above  
18 would greatly reduce the overall  
19 operating expenses to about \$50,000 a  
20 year.

21 Now, Mr. Caldwell didn't  
22 understand that when I talked to him the  
23 other day. But if you summarize all of  
24 these items that the Borough could do --  
25 there's over 190,000 or so -- it would

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2 come down to between 50 and 60,000 that  
3 the Borough would have to put out.

4 And I don't know why we  
5 couldn't do that. It is my belief that  
6 with all the accommodations, that the  
7 board of -- the counsel of Norristown  
8 deserves this building above all other  
9 organizations for free.

10 And to improve the community  
11 relations and require the finest police  
12 personnel available in this area, no  
13 other group has rightfully this claim.

14 It is also possible with all of  
15 the political assistance from the  
16 congressional, state, county and local  
17 representatives that all of this could be  
18 done financially.

19 I want to thank you all for the  
20 courtesy tonight to help the growth of  
21 our fine police department and the good  
22 people of Norristown.

23 I would be willing to answer  
24 any questions that the group here has.

25 MR. NELSON: Thank you,

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Mr. Dimino.

MR. DIMINO: Thank you.

MR. NELSON: Are there any other public comments? Anyone else wish to speak to this?

Seeing no one, then I thank you very much for coming out tonight. The LRA will be taking these comments into consideration, and will be publishing the final plan that will be available for review soon, very soon.

- - -

(Whereupon, the hearing was concluded at 7:04 p.m.)

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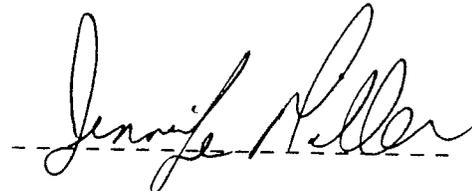
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## C E R T I F I C A T I O N

I, Jennifer Miller, a Court Reporter and Notary Public for the Commonwealth of Pennsylvania, do hereby certify the foregoing to be a true and accurate transcript of my original stenographic notes taken at the time and place hereinbefore set forth.



Jennifer Miller  
Court Reporter  
Notary Public

Dated: February 18, 2010

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<b>represented</b> 15:24	<b>seat</b> 26:17	<b>sparked</b> 20:9	15:7	35:21
<b>representing</b> 5:4,13	<b>second</b> 20:22 22:11	<b>speak</b> 26:10,12,15	<b>taken</b> 1:10 35:9	<b>transfer</b> 6:15 8:12
7:7	23:11,14	33:6	<b>takes</b> 18:19	<b>Transition</b> 2:4
<b>reproduction</b> 35:22	<b>security</b> 29:16,24	<b>speaker</b> 11:16	<b>talk</b> 15:3	<b>transportation</b> 14:2
<b>require</b> 6:18 32:11	30:18	<b>special</b> 8:5	<b>talked</b> 31:22	<b>treat</b> 30:10
<b>required</b> 7:4 8:5	<b>see</b> 10:4,11,16 13:8	<b>specific</b> 17:14	<b>talking</b> 16:20 17:13	<b>treatments</b> 22:10
<b>reserve</b> 1:5 4:19 6:8	13:13 18:7 21:18	<b>squad</b> 29:6	<b>talks</b> 17:16	<b>trends</b> 17:17 18:2
27:24 28:3,11	21:23 22:21 23:6	<b>square</b> 11:24	<b>tank</b> 13:2	<b>tried</b> 13:15
29:12	25:20	<b>staff</b> 5:18 12:2	<b>tanks</b> 12:20	<b>true</b> 35:7
<b>reserves</b> 28:16	<b>Seeing</b> 33:7	19:16	<b>tax</b> 19:22 24:17,18	<b>two</b> 13:21 14:10
<b>resident</b> 26:22	<b>sees</b> 9:24	<b>stand</b> 26:17	<b>taxes</b> 31:6	22:19 31:8,8
<b>resources</b> 14:3	<b>sensitive</b> 24:17	<b>started</b> 19:12	<b>taxpayers</b> 19:21	<b>two-acre</b> 7:21
<b>respect</b> 12:16	<b>sent</b> 9:12	<b>state</b> 28:12 32:16	<b>teachers</b> 21:8	<b>type</b> 11:25 12:20,22
<b>responsibility</b> 10:15	<b>sergeant</b> 28:24	<b>stated</b> 25:12	<b>team</b> 27:4	<b>typical</b> 20:23
<b>Restroom</b> 29:9	<b>serious</b> 28:20 30:3	<b>States</b> 31:5	<b>Teamerson</b> 2:3 5:19	
<b>result</b> 31:17	<b>served</b> 26:25 28:23	<b>stationed</b> 28:14	11:19,20 34:4	<b>U</b>
<b>return</b> 27:9	<b>service</b> 8:23 9:17	<b>stay</b> 27:9	<b>Tech</b> 2:3 5:19	<b>underground</b> 12:20
<b>reuse</b> 3:8,17 4:13,16	<b>services</b> 10:5,5	<b>stenographic</b> 35:8	<b>technology</b> 22:16	13:2

<p><b>understand</b> 31:22  <b>undesirable</b> 29:8  <b>unit</b> 13:25 28:18              30:18  <b>United</b> 31:5  <b>units</b> 14:9  <b>unresolved</b> 12:25  <b>UPDATE</b> 1:3  <b>upgrade</b> 22:16  <b>Urban</b> 6:25 9:13  <b>USARC</b> 1:5  <b>use</b> 7:17 20:17              24:13 29:19  <b>U.S</b> 1:5 4:18</p> <hr/> <p style="text-align: center;"><b>V</b></p> <hr/> <p><b>vacated</b> 11:14  <b>various</b> 7:9 8:3  <b>vehicle</b> 13:21,22  <b>vehicles</b> 13:18,18  <b>vests</b> 28:19 30:3  <b>view</b> 14:14  <b>visitors</b> 29:14  <b>vital</b> 26:3  <b>vitality</b> 19:3  <b>voice</b> 24:12  <b>volunteers</b> 28:2</p> <hr/> <p style="text-align: center;"><b>W</b></p> <hr/> <p><b>wall</b> 21:5  <b>walls</b> 22:5  <b>want</b> 5:6 15:6,25              19:16 24:8 32:19  <b>wanted</b> 24:11 26:10              26:10  <b>warrant</b> 28:16  <b>war-torn</b> 29:3  <b>water</b> 12:21  <b>way</b> 4:20 18:16 20:4              20:6,7,10,12              30:10  <b>ways</b> 8:11 20:3  <b>weekend</b> 12:4  <b>weekends</b> 28:2,7  <b>we'll</b> 5:25  <b>we're</b> 11:22 13:13              14:24 15:3 16:15              17:13 18:7,8              25:17  <b>we've</b> 7:11 11:5              19:15,20 20:14              25:5,7,8  <b>wheeled</b> 13:18  <b>WILLIAM</b> 34:6  <b>willing</b> 32:23  <b>window</b> 22:10  <b>wish</b> 26:11 33:5  <b>wonderful</b> 31:3  <b>wonders</b> 9:24</p>	<p><b>words</b> 30:14  <b>work</b> 13:22 14:20              21:25 25:3  <b>working</b> 24:9,10  <b>workshops</b> 11:6  <b>worsen</b> 16:18</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p><b>X</b> 34:2</p> <hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>year</b> 7:24 17:22              18:3 31:20  <b>years</b> 12:6 14:10              26:25 27:8,10              31:4</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p><b>zoning</b> 10:21</p> <hr/> <p style="text-align: center;"><b>S</b></p> <hr/> <p><b>\$50,000</b> 31:19  <b>\$500,000</b> 21:15              24:14</p> <hr/> <p style="text-align: center;"><b>I</b></p> <hr/> <p><b>ILT</b> 1:4  <b>1020</b> 1:11  <b>11</b> 34:4  <b>12</b> 21:4 26:25  <b>14</b> 34:5  <b>15</b> 3:12 21:4  <b>18</b> 1:7 21:8 35:16  <b>19</b> 18:3  <b>190,000</b> 31:25  <b>1970</b> 28:9  <b>1974</b> 27:8</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p><b>20</b> 3:12 29:6  <b>20-plus</b> 18:13  <b>2003</b> 16:24  <b>2005</b> 6:10  <b>2006</b> 14:23  <b>2007</b> 12:14 17:20  <b>2008</b> 17:20  <b>2009</b> 17:22  <b>2010</b> 1:7 17:22              35:16  <b>2011</b> 11:13  <b>2018</b> 18:3  <b>22</b> 28:2  <b>23</b> 34:6  <b>25</b> 17:5  <b>26</b> 34:7  <b>260</b> 29:2  <b>2600</b> 17:21 18:6  <b>2800</b> 17:23</p>	<p style="text-align: center;"><b>3</b></p> <hr/> <p><b>3</b> 34:3  <b>300</b> 21:6  <b>3017</b> 18:3  <b>35,000</b> 11:24  <b>350</b> 21:7  <b>358</b> 14:7  <b>360th</b> 28:25  <b>3600</b> 18:4</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p><b>416</b> 14:7  <b>44-acre</b> 27:25  <b>45</b> 21:7 27:20</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p><b>50</b> 12:6 27:7 31:4              32:2  <b>500</b> 18:18  <b>54</b> 27:10  <b>550</b> 18:18</p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p><b>60,000</b> 32:2  <b>600</b> 18:20</p> <hr/> <p style="text-align: center;"><b>7</b></p> <hr/> <p><b>7:00</b> 1:12  <b>7:04</b> 33:15  <b>70</b> 29:5  <b>700</b> 18:20</p>
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Lean Kollan



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF MANAGEMENT

February 4, 2010



Anne Marie Rohricht  
Chief Financial Officer  
Norristown Area School District  
401 North Whitehall Road  
Norristown, Pennsylvania 19403

Dear Ms. Rohricht:

This will acknowledge receipt of the Norristown Area School District's revised application dated January 6, 2010 and supplementary information dated January 29, 2010 for the acquisition of the 1LT Ray S. Musselman Memorial U. S. Army Reserve Center property in Norristown, Pennsylvania. The revised application supersedes and replaces the school district's October 30, 2006 application to acquire the Reserve Center property for creation of a Small Learning Community school for grades 9-12. The U. S. Department of Education approved the October 30, 2006 application on April 11, 2007.

As a result of the significant amount of time that has elapsed since the 2006 application was approved and continuing district-wide educational reforms and comprehensive space studies, the school district has determined that the need for space for early childhood education programs is presently more compelling than its previously proposed high school program use. The Norristown Area School District revised and resubmitted its educational Public Benefit Conveyance application to address the school district's 2010 space and programming priorities. I am pleased to advise you that the U. S. Department of Education has approved the Norristown Area School District's January 6, 2010 revised application to acquire the Reserve Center property for kindergarten programs and, in the future, possible expansion of the school district's pre-kindergarten programs.

On April 11, 2007 the U. S. Department of Education requested assignment of the Reserve Center property from the Army for conveyance to the Norristown Area School District at 100% Public Benefit Allowance discount. Since the revised January 6, 2010 application is eligible for a 100% Public Benefit Allowance discount and is essentially revising only the educational program of use, we intend to let the 2007 assignment request to the Army stand since the approved applicant and Public Benefit Allowance discount remain unchanged.

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202-4500  
www.ed.gov

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

When the U. S. Department of Education initially approved the Norristown Area School District's application on April 11, 2007 there was no recognized Local Redevelopment Authority working with the military on the disposal of the Musselman Memorial U. S. Army Reserve Center and we informed the Army's Base Transition Coordinator of the approval of the school district's Public Benefit Conveyance application. Since that time a Local Redevelopment Authority has been recognized by the Department of Defense. By copy of this letter, the U. S. Department of Education is advising the Musselman Memorial Army Reserve Center Local Redevelopment Authority of its approval of the school district's revised January 6, 2010 application.

Depending on the length of time it takes the Army to vacate the premises and proceed with the disposal of the Musselman Army Reserve Center, the U. S. Department of Education may require the Norristown Area School District to update its proposed program and plan of use to ensure that your needs and financial resources have not changed during the intervening period since approval of the revised application. Regardless of whether there are amendments necessary to the January 6, 2010 application, we will require an updated resolution from the school board authorizing acquisition of this property close to the time of transfer.

I will keep you informed as we learn more from the Army about its plans for relocation and federal transfer of the Musselman Memorial Reserve Center. Please contact me at (202) 401-3587 or [Mary.Hughes@ed.gov](mailto:Mary.Hughes@ed.gov) if you have any questions at this time.

Sincerely,



Mary E. Hughes  
Federal Real Property Assistance Program

cc: Steven Nelson, Director of Policy, Montgomery County ✓  
Musselman Memorial Army Reserve Center Local Redevelopment Authority

## **APPENDIX B. CONSULTATION**

This appendix contains the following consultation and coordination documents:

- Letter sent to the U.S. Fish and Wildlife Service, Pennsylvania Field Office
- Letter sent to the Pennsylvania Department of Conservation and Natural Resources
- Letter sent to the Pennsylvania Fish and Boat Commission
- Letter sent to the Pennsylvania Game Commission
- Determination letter sent to the State Historic Preservation Officer, Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation
- Letter sent to the Historical Society of Montgomery County
- Letter sent to the Absentee-Shawnee Tribe of Indians of Oklahoma (NOTE: Identical letters were sent to Akwesasne Mohawk Nation, Cayuga Nation of Indians, The Delaware Nation, Oneida Indian Nation, Onondaga Indian Nation, and Tonawanda Band of Seneca.)
- Letter response from the U.S. Fish and Wildlife Service, Pennsylvania Field Office
- Letter response from the Pennsylvania Department of Conservation and Natural Resources
- Record of Conversation with the Pennsylvania Fish and Boat Commission
- Record of Conversation with the Pennsylvania Game Commission
- Concurrence letter from the State Historic Preservation Officer, Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation
- Email response from the Historical Society of Montgomery County
- Email correspondence with the Oneida Indian Nation
- Letter from the Norristown Fire Department
- Letter from the Norristown Police Department

NOTE: The Army sent identical enclosures with each of the biological consultation letters. These enclosures are included in this appendix only with the letter sent to the U.S. Fish and Wildlife Service.





DEPARTMENT OF THE ARMY  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

MAR 18 2011

Ms. Carole Copeyon  
Endangered Species Program  
United States Fish and Wildlife Service  
Pennsylvania Field Office  
315 South Allen St., Ste 322  
State College, PA 16801-4850

Ms. Copeyon,

The U.S. Army Reserve 99<sup>th</sup> Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (Musselman USARC) located in Norristown, Pennsylvania. The EA is being prepared in accordance with the Council on Environmental Quality (CEQ) regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651. NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your Agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action. Your participation in this process is greatly appreciated.

The purpose and need of the proposed action is to meet the requirements of the Defense Base Closure and Realignment Act. The Musselman USARC is a 3.45-acre parcel located in Norristown, Pennsylvania (Attachment 1). Since 2007, the current occupying units of the Musselman USARC are the U.S. Army's 465<sup>th</sup> Transportation Company and a platoon-sized element of the 444<sup>th</sup> Human Resources Company.

The Musselman USARC contains two permanent structures (a main administration building and an Organizational Maintenance Shop [OMS]) and three parking lots. Most of the property is covered by impervious surface material, including asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining surface area is grassed, with trees planted along the southern and eastern portions of the property. The OMS is used mostly for storage, but has four vehicle-maintenance bays and several small offices. The maintenance bays are not used for heavy maintenance since there is no appropriate drainage system to handle wastewaters, such as floor drains or wash racks. Typical OMS tasks include tire and oil changes, minor repairs, and preventative maintenance for wheeled vehicles.

Three alternatives are being analyzed in the EA: 1) No Action Alternative; 2) Caretaker Status; and 3) Disposal and Reuse (the Army's Preferred Alternative). The Local Redevelopment Authority (LRA), consisting of representatives from the Municipality of Norristown, Plymouth Township, Montgomery County, Montgomery County Planning Commission, Norristown Area School District, and Continuum of Care Homeless Program, recommended that the property be used as an elementary school/kindergarten center. No demolition on the site is planned; however, some facility improvements are planned.

The Army is not aware of any resident protected species at the Musselman USARC site. The U.S. Fish and Wildlife Service (USFWS) Northeast Regional website was accessed to determine if any Federally-listed species occur in the vicinity of the project location ([http://www.fws.gov/northeast/endangered/endangered\\_species\\_listing.html](http://www.fws.gov/northeast/endangered/endangered_species_listing.html)). The endangered Indian bat (*Myotis sodalis*) and threatened bog turtle

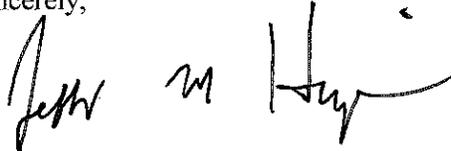
(*Clemmys muhlenbergii*) both potentially occur in Montgomery County. The small whorled pogonia (*Isotria medeoloides*) historically occurred in Montgomery County, but is currently not listed as potentially occurring in the county. The bald eagle (*Haliaeetus leucocephalus*) and the Arctic Peregrine falcon (*Falco peregrines tundrius*) are in recovery in the county. No known Indiana bat hibernacula or summer roosting areas are located within the USARC site or in Montgomery County.

Although no formal delineation of wetlands has been performed on the Musselman USARC site, no jurisdictional wetlands on the property are recorded in the USFWS National Wetlands Inventory (NWI). Attachment 2 is a map from the NWI website showing the paucity of wetlands in the area. Without wetlands in the area, bog turtles are unlikely to occur on the project site.

In addition, the Pennsylvania Natural Diversity Inventory (PNDI) Project Planning Environmental Review tool on the Pennsylvania Natural Heritage Program's website was accessed to screen for potential impacts to species of special concern. No known impacts to threatened and endangered species and resources within the project area were identified (Attachment 3).

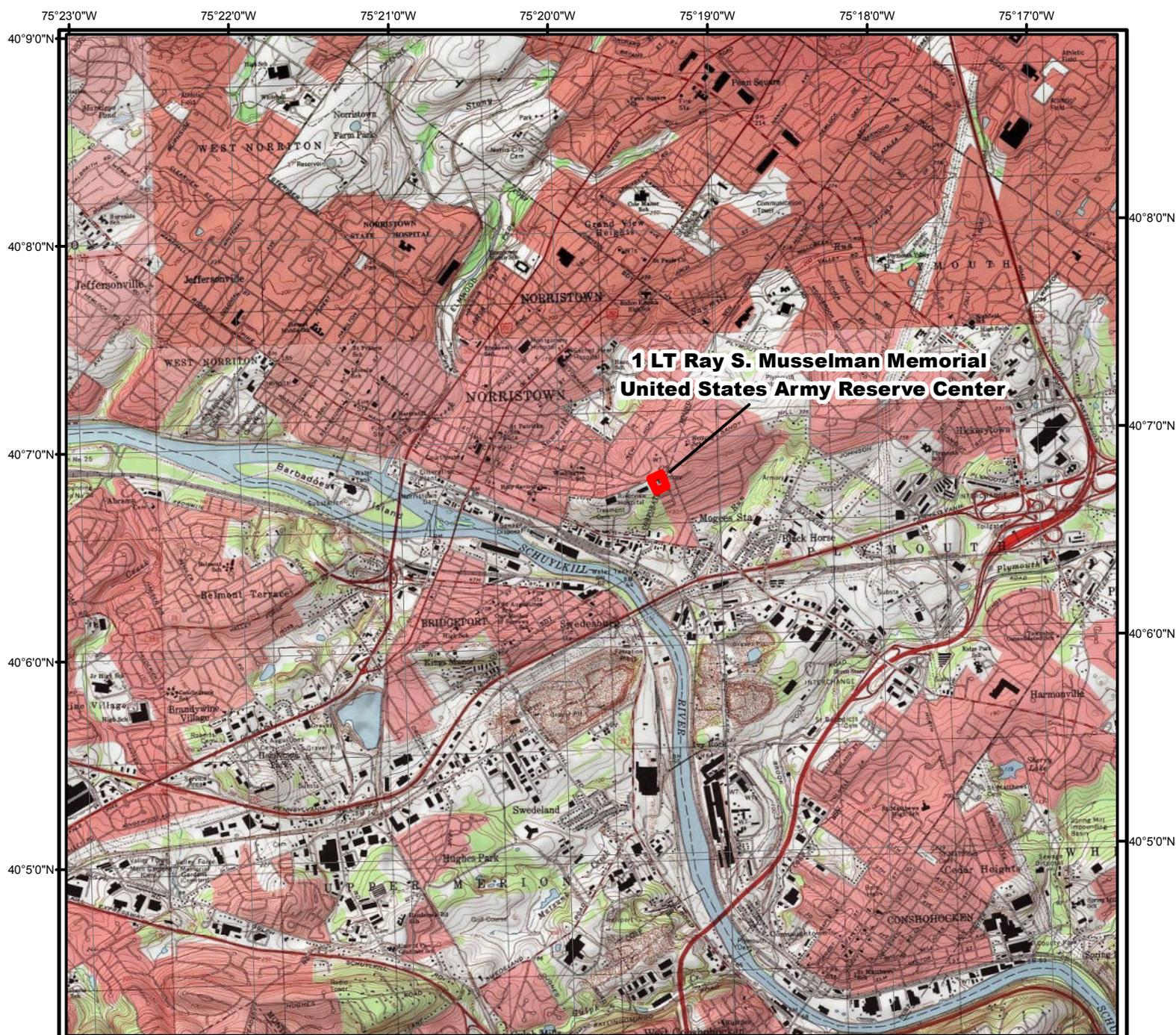
Comments on the proposed action and its alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99<sup>th</sup> RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix NJ 08640 or by email at [amanda.w.murphy@usar.army.mil](mailto:amanda.w.murphy@usar.army.mil). If you have any questions, please contact Ms. Murphy at 609-521-8047.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff M. Hrzc", written in a cursive style.

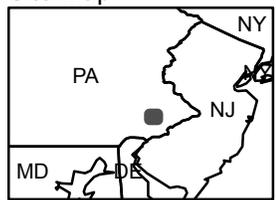
Jeffrey M. Hrzc  
Chief, Environmental Division

*Enclosures:* Attachment 1 – Musselman Site Location  
Attachment 2 – Musselman Wetland Inventory  
Attachment 3 – PNDI Project Environmental Review Receipt



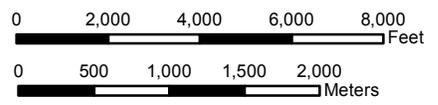
**1 LT Ray S. Musselman Memorial  
United States Army Reserve Center**

Site Map



**Legend**

 Musselman USARC Boundary



USARC United States Army Reserve Center

Prepared For:  
U.S. Army Corps of Engineers, Mobile District

Attachment 1  
Musselman Site Location





# U.S. Fish and Wildlife Service National Wetlands Inventory

Musselman USARC

Jan 31, 2011



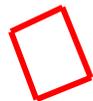
### Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

USARC United States Army Reserve Center



Approximate Site Boundary

Prepared For:

U.S. Army Corps of Engineers, Mobile District

Attachment 2

Musselman Wetland Inventory



## 1. PROJECT INFORMATION

Project Name: **Musselman USARC**

Date of review: **1/31/2011 1:18:55 PM**

Project Category: **Military and Law Enforcement Activities, Other**

Project Area: **3.5 acres**

County: **Montgomery** Township/Municipality: **Plymouth, Norristown**

Quadrangle Name: **NORRISTOWN** ~ ZIP Code: **19401, 19462**

Decimal Degrees: **40.113395 N, -75.323896 W**

Degrees Minutes Seconds: **40° 6' 48.2" N, -75° 19' 26" W**



## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

Note that regardless of PNDI search results, projects requiring a Chapter 105 DEP individual permit or GP 5, 6, 7, 8, 9 or 11 in certain counties (Adams, Berks, Bucks, Carbon, Chester, Cumberland, Delaware, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton, Schuylkill and York) must comply with the bog turtle habitat screening requirements of the PASPGP.

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for one year** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

**RESPONSE:** No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

**RESPONSE:** No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

**RESPONSE:** No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

**RESPONSE:** No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

### 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. For cases where a "Potential Impact" to threatened and endangered species has been identified before the application has been submitted to DEP, the application should not be submitted until the impact has been resolved. For cases where "Potential Impact" to special

concern species and resources has been identified before the application has been submitted, the application should be submitted to DEP along with the PNDI receipt, a completed PNDI form and a USGS 7.5 minute quadrangle map with the project boundaries delineated on the map. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. DEP and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <http://www.naturalheritage.state.pa.us>.



### 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a **preliminary** screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

### 6. AGENCY CONTACT INFORMATION

#### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552, Harrisburg, PA.  
17105-8552  
Fax:(717) 772-0271

#### U.S. Fish and Wildlife Service

Endangered Species Section  
315 South Allen Street, Suite 322, State College, PA.  
16801-4851  
NO Faxes Please.

#### PA Fish and Boat Commission

Division of Environmental Services  
450 Robinson Lane, Bellefonte, PA. 16823-7437  
NO Faxes Please

#### PA Game Commission

Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA. 17110-9797  
Fax:(717) 787-6957

### 7. PROJECT CONTACT INFORMATION

Name: Amanda Murphy  
Company/Business Name: 99th RSC DPW  
Address: Environmental Division, 5231 South Scott Plaza  
City, State, Zip: Fort Dix NJ 08640  
Phone:( 609 ) 521-8047 Fax:(      )       
Email: amanda.w.murphy@usar.army.mil

### 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

\_\_\_\_\_  
applicant/project proponent signature

\_\_\_\_\_  
date



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

MAR 18 2011

Ms. Emilee Boyer  
Environmental Review Specialist  
Pennsylvania Department of Conservation and Natural Resources  
Bureau of Forestry, Ecological Services Section  
400 Market Street, P.O. Box 8552  
Harrisburg, PA 17105-8552

Ms. Boyer,

The U.S. Army Reserve 99<sup>th</sup> Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (Musselman USARC) located in Norristown, Pennsylvania. The EA is being prepared in accordance with the Council on Environmental Quality (CEQ) regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651. NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your Agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action. Your participation in this process is greatly appreciated.

The purpose and need of the proposed action is to meet the requirements of the Defense Base Closure and Realignment Act. The Musselman USARC is a 3.45-acre parcel located in Norristown, Pennsylvania (Attachment 1). Since 2007, the current occupying units of the Musselman USARC are the U.S. Army's 465<sup>th</sup> Transportation Company and a platoon-sized element of the 444<sup>th</sup> Human Resources Company.

The Musselman USARC contains two permanent structures (a main administration building and an Organizational Maintenance Shop [OMS]) and three parking lots. Most of the property is covered by impervious surface material, including asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining surface area is grassed, with trees planted along the southern and eastern portions of the property. The OMS is used mostly for storage, but has four vehicle-maintenance bays and several small offices. The maintenance bays are not used for heavy maintenance since there is no appropriate drainage system to handle wastewaters, such as floor drains or wash racks. Typical OMS tasks include tire and oil changes, minor repairs, and preventative maintenance for wheeled vehicles.

Three alternatives are being analyzed in the EA: 1) No Action Alternative; 2) Caretaker Status ; and 3) Disposal and Reuse (the Army's Preferred Alternative). The Local Redevelopment Authority (LRA), consisting of representatives from the Municipality of Norristown, Plymouth Township, Montgomery County, Montgomery County Planning Commission, Norristown Area School District, and Continuum of Care Homeless Program, recommended that the property be used as an elementary school/kindergarten center. No demolition on the site is planned; however, some facility improvements are planned.

The Army is not aware of any resident protected species at the Musselman USARC site. The U.S. Fish and Wildlife Service (USFWS) Northeast Regional website was accessed to determine if any Federally-listed species occur in the vicinity of the project location (<http://www.fws.gov/northeast/angered/>

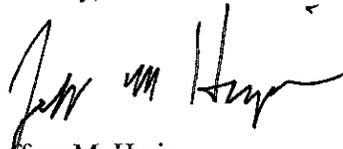
[endangered species listing.html](#)). The endangered Indian bat (*Myotis sodalis*) and threatened bog turtle (*Clemmys muhlenbergii*) both potentially occur in Montgomery County. The small whorled pogonia (*Isotria medeoloides*) historically occurred in Montgomery County, but is currently not listed as potentially occurring in the county. The bald eagle (*Haliaeetus leucocephalus*) and the Arctic Peregrine falcon (*Falco peregrines tundrius*) are in recovery in the county. No known Indiana bat hibernacula or summer roosting areas are located within the USARC site or in Montgomery County.

Although no formal delineation of wetlands has been performed on the Musselman USARC site, no jurisdictional wetlands on the property are recorded in the USFWS National Wetlands Inventory (NWI). Attachment 2 is a map from the NWI website showing the paucity of wetlands in the area. Without wetlands in the area, bog turtles are unlikely to occur on the project site.

In addition, the Pennsylvania Natural Diversity Inventory (PNDI) Project Planning Environmental Review tool on the Pennsylvania Natural Heritage Program's website was accessed to screen for potential impacts to species of special concern. No known impacts to threatened and endangered species and resources within the project area were identified (Attachment 3).

Comments on the proposed action and its alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99<sup>th</sup> RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix NJ 08640 or by email at [amanda.w.murphy@usar.army.mil](mailto:amanda.w.murphy@usar.army.mil). If you have any questions, please contact Ms. Murphy at 609-521-8047.

Sincerely,



Jeffrey M. Hrzic  
Chief, Environmental Division

*Enclosures:* Attachment 1 – Musselman Site Location  
Attachment 2 – Musselman Wetland Inventory  
Attachment 3 – PNDI Project Environmental Review Receipt



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

MAR 18 2011

Mr. Raymond Bednarchik  
Pennsylvania Fish and Boat Commission  
Southeast Regional Office  
Brubaker Valley Rd and Lakeview Dr.  
P.O. Box 9  
Elm, PA 17521

Mr. Bednarchik,

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Sincerely,



Jeffrey M. Hrzic  
Chief, Environmental Division

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DEPARTMENT OF THE ARMY  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

MAR 18 2011

Mr. Doug Killough  
Pennsylvania Game Commission  
Southeast Region  
448 Synder Rd  
Reading, PA 19605

Mr. Killough,

The U.S. Army Reserve 99<sup>th</sup> Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (Musselman USARC) located in Norristown, Pennsylvania. The EA is being prepared in accordance with the Council on Environmental Quality (CEQ) regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651. NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your Agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action. Your participation in this process is greatly appreciated.

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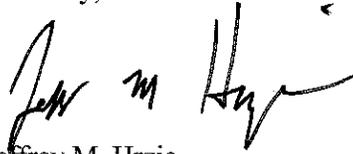
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Sincerely,



Jeffrey M. Hrzic  
Chief, Environmental Division

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DEPARTMENT OF THE ARMY  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

Ms. Barbara Franco  
State Historic Preservation Officer  
Pennsylvania Historical and Museum Commission  
Bureau for Historic Preservation  
300 North Street  
Harrisburg, PA 17120-0093

Ms. Franco,

The Defense Base Realignment and Closure (BRAC) Commission has recommended closure of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (Musselman USARC) located in Norristown, Pennsylvania. To implement this recommendation, the U.S. Army Reserve 99<sup>th</sup> Regional Support Command (RSC) is proposing to dispose of the USARC to a non-Federal entity. The Army's proposed transfer of property out of Federal ownership is an undertaking that could have an effect on historic resources. The purpose of this letter is to provide you with our recently completed Cultural Resources Assessment, seek your concurrence on the Army's determination of no effect, and complete consultation pursuant to Section 106 of the National Historic Preservation Act of 1996, as amended.

The Musselman USARC is located on a 3.45-acre parcel on the southeast side of Norristown, Montgomery County, Pennsylvania and contains two permanent structures and three parking lots (Attachment 1). Attachments 2, 3, and 4 provide an aerial photograph of the Area of Potential Effect (APE) which is consistent with the legal boundary of the USARC, an aerial photograph of the structures at the site, and photographs of the structures, respectively.

Construction of the 35,496-square-foot administration building and the 3,850-square-foot four-bay Organizational Maintenance Shop (OMS) building was completed in 1959 and significantly renovated in 1994. Two military equipment parking (MEP) areas and a privately owned vehicle (POV) parking area are also contained within the property. Most of the property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining land is grassed with trees along the eastern and southern portions of the property. The U.S. Army Reserve 465th Transportation Company and a platoon-sized element of the 444th Human Resources Company are assigned to the Musselman USARC.

The Local Redevelopment Authority recommended the USARC be transferred to the local school district for reuse as an elementary school/kindergarten center. Major structural renovations are not proposed. Administrative offices and classrooms would be established in a manner generally consistent with the current layout of the main building. Minor renovations and facility improvements would be made to establish up to twelve classrooms, one library, and several smaller offices; furnish the center; repaint walls and ceilings; update flooring and carpeting; convert the existing drill floor to a combination gymnasium/cafeteria; update the information technology capabilities of the main building with respect to computers, telephones, and other IT needs; and upgrade the restrooms. The OMS would be used for storage.

*Archaeological Resources.* The U.S. Army Reserve 99<sup>th</sup> RSC Integrated Cultural Resources Management Plan 2009 – 2014, dated September 2009, summarized that no previous archaeological surveys have been performed. A recent literature review completed as part of the enclosed Cultural Resources Assessment

confirmed substantial ground disturbance through the construction of buildings and parking lots. Because of the extent and pattern of these disturbances, the potential for identifying intact cultural deposits within the APE is low. The Army has determined that there would be no effect on archeological resources as a result of the proposed action.

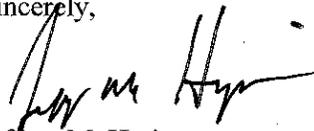
*Historic Architecture.* The 99<sup>th</sup> RSC performed the Cultural Resources Assessment in January 2011 to determine eligibility of the Musselman USARC for listing in the National Register of Historic Places (NRHP). The Cultural Resources Assessment finds that the Musselman is not eligible for the NRHP, therefore the Army has determined that there would be no effect to historic properties as a result of the proposed action.

*Identification of Interested Parties.* On March 24, 2011, the Army informed the Historical Society of Montgomery County (HSMC) of the proposed action, and requested they respond within 30 days if they had any information about the site or if they wished to participate in consultation. The Army did not receive any response from the HSMC on these matters. The Army also initiated consultation on March 24, 2011 and March 31, 2011 with 7 Federally-Recognized Tribes. To date, the Army has only received a response from the Oneida Indian Nation in which they requested a copy of the Cultural Resources Assessment. A copy of the completed Cultural Resources Assessment was sent to the Oneida Indian Nation on May 17, 2011.

*Notification to the Public.* An Environmental Assessment (EA), that is being prepared for the proposed action in accordance with the National Environmental Policy Act of 1969 (NEPA), will provide the public an opportunity to comment on the effect to cultural resources. Public notices will appear in local newspapers, and a copy of the Final EA will be available online and at local libraries in summer/fall 2011.

The Army requests concurrence with the determination of **no effect** within 30 calendar days from the date on this letter. Correspondence regarding this matter should be directed to: Amanda Murphy, 99<sup>th</sup> RSC DPW Environmental, 5231 South Scott Plaza, Fort Dix NJ 08640 or by email at [amanda.w.murphy@usar.army.mil](mailto:amanda.w.murphy@usar.army.mil). If you have any questions, please contact Ms. Murphy at 609-521-8047. We look forward to working cooperatively with you to make this important project successful for all parties involved.

Sincerely,

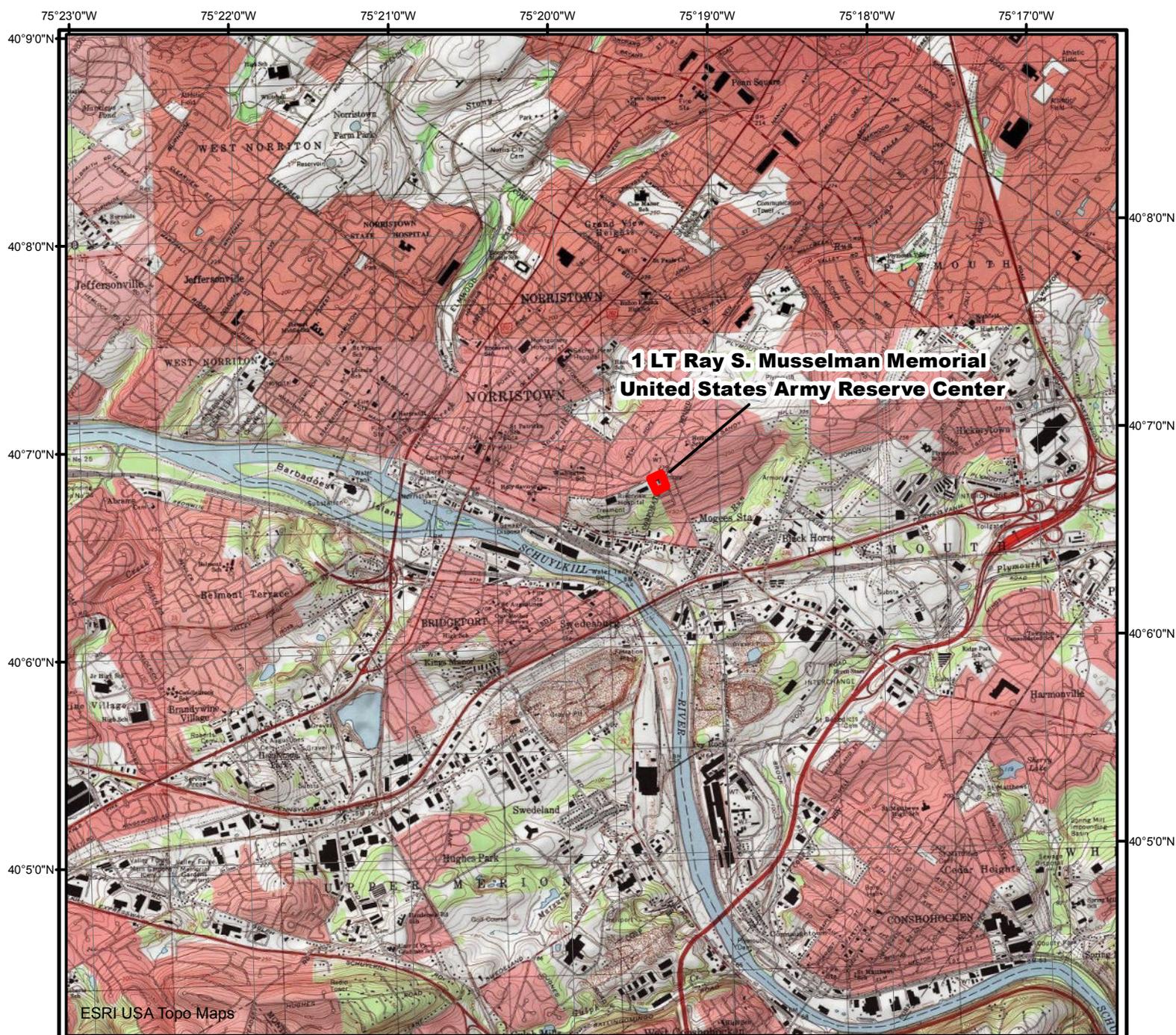


Jeffrey M. Hrzic  
Chief, Environmental Division

- Attachment 1 – Musselman USARC Location Map
- Attachment 2 – Musselman USARC Aerial Photograph - Area of Potential Effect
- Attachment 3 – Musselman USARC Aerial Photograph - Structures
- Attachment 4 – Musselman USARC – Photos of Structures

Enclosures: Request to Initiate Consultation Form

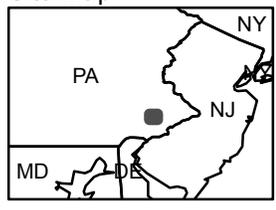
*Cultural Resources Assessment for Base Realignment and Closure Actions at the Musselman U.S. Army Reserve Center (PA 068), Norristown, Pennsylvania.* Brockington and Associates, Inc. April 2011.



**1 LT Ray S. Musselman Memorial  
United States Army Reserve Center**

ESRI USA Topo Maps

**Site Map**



**Legend**

 Musselman USARC Boundary

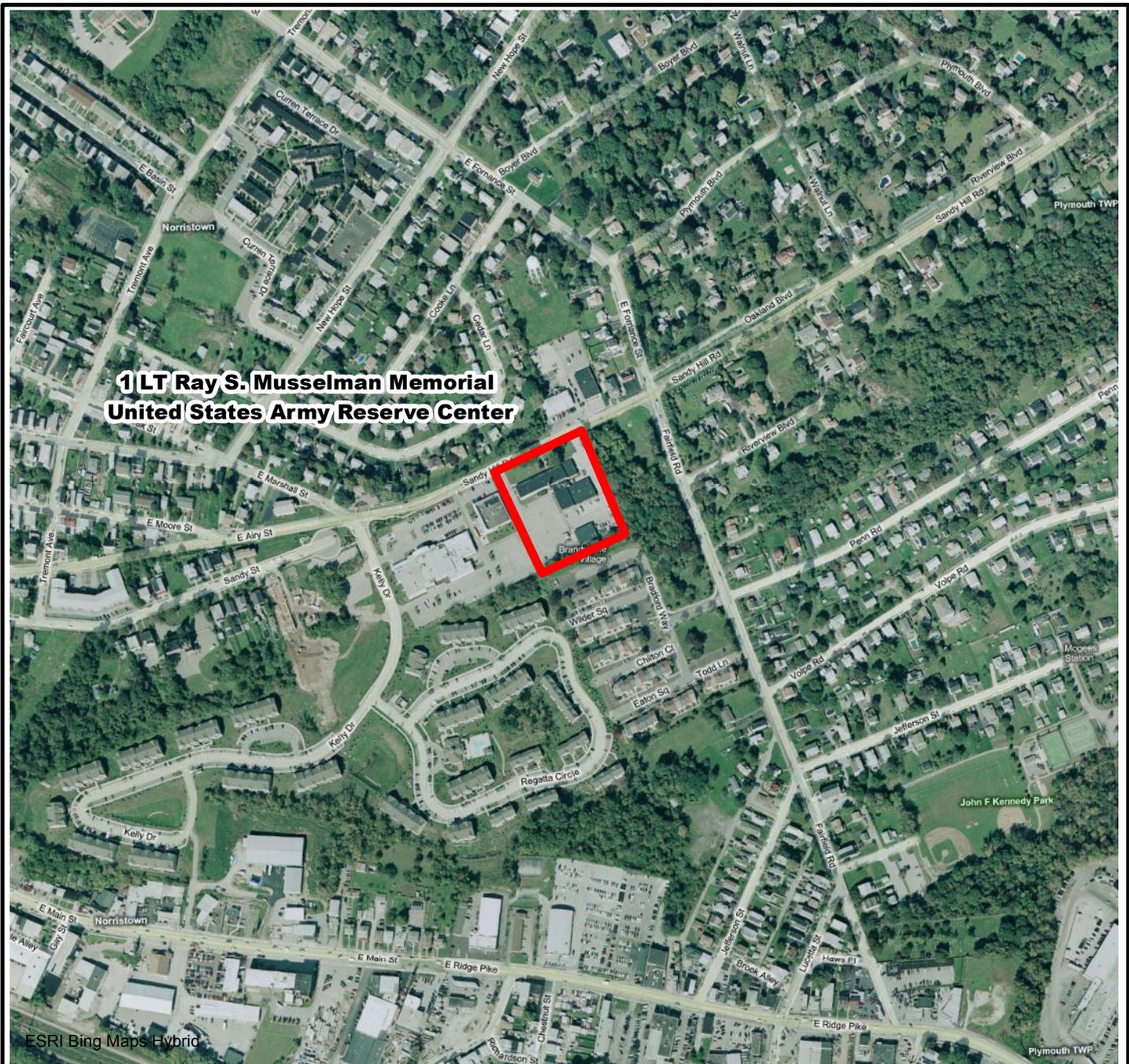


USARC United States Army Reserve Center

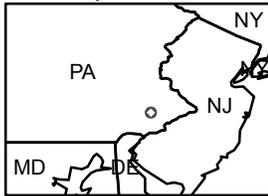
Prepared For:  
U.S. Army Corps of Engineers, Mobile District

Attachment 1  
Musselman USARC Location Map





Site Map



Legend

 Musselman USARC Boundary



USARC United States Army Reserve Center

Prepared For:

U.S. Army Corps of Engineers, Mobile District

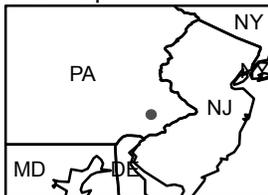
Attachment 2

Musselman USARC Aerial Photograph -  
Area of Potential Effect



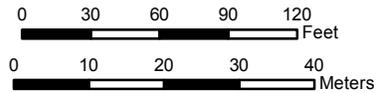


Site Map



Legend

-  Musselman USARC Boundary
- MEP Military Equipment Parking
- OMS Organizational Maintenance Shop
- POV Privately Owned Vehicle
- USARC United States Army Reserve Center



Prepared For:  
U.S. Army Corps of Engineers, Mobile District

Attachment 3  
Musselman USARC Aerial Photograph - Structures



## Attachment 4. Musselman USARC – Photos of Structures



Photo 1 of 3

Showing the front of the Musselman USARC Administration Building – 35,496 square feet – Built in 1959



Photo 2 of 3

Showing the rear view of the Administration Building



Photo 3 of 3

Showing the Organizational Maintenance Shop - 3,850 square feet – Built in 1959

**Request to Initiate Consultation in Compliance with the State History Code and  
Section 106 of the National Historic Preservation Act**

Applicant Information (print neatly, this will be used in the return envelope)			
Applicant Name	Amanda Murphy, 99 <sup>th</sup> RSC DPW		
Street Address	5231 South Scott Plaza		
City	Fort Dix	Phone Number	609-521-8047
State/ZIP	NJ / 08640		

Contact Person to Receive Response (if applicable) (print neatly, this will be used in the return envelope)			
Name/Company	Amanda Murphy, 99 <sup>th</sup> RSC DPW		
Street Address	5231 South Scott Plaza		
City	Fort Dix	Phone Number	609-521-8047
State/ZIP	NJ / 08640	Fax Number	

Project Information			
Project Title	ILT Ray S. Musselman Memorial United States Army Reserve Center, Disposal and Reuse		
Project Location and/address	1020 Sandy Hill Road Norristown, PA 19401		
Municipality	Norristown	County Name	Montgomery
If this project was ever reviewed before, include previous ER #			

Project Type (Check all that apply)			
<b>Will Your Project Be Government Funded/Sponsored or On Government Land?</b>			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    Specify Agency and Program Name Below			
State Agency:	_____	Program:	_____
Federal Agency:	USACE	Program:	BRAC
Local/Other: _____			
<b>Will Your Project Require Permits or Approvals?</b>			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No    Specify Agency and/or Program Name Below			
Anticipated Permits:			
State Agency:	_____	Program:	_____
Federal Agency:	_____	Program:	_____
Agency Office to Receive Copy of Response (Check all that apply)			
Army Corps of Engineers:	<input type="checkbox"/> Philadelphia	<input type="checkbox"/> Baltimore	<input type="checkbox"/> Pittsburgh
DEP Office:	<input type="checkbox"/> Central Office	<input type="checkbox"/> Regional Office:	_____
<input type="checkbox"/> District Mining Office:	_____	<input type="checkbox"/> Oil & Gas Office:	_____
<input type="checkbox"/> Other: (provide address)	_____		

**Required Project Information for BHP/SHPO Review**

Total Acres in the property under review: 3.45 acres

Total acres of earth disturbance for this proposed activity; none

Are there any buildings or structures within the project area?  Yes  No

Approximate age of buildings: 52 years

Project located in or adjacent to a historic district?  Yes  No  Unsure

Name of Historic District \_\_\_\_\_

**Submissions Must Also Include:**

MAP LOCATION: A 7.5 USGS Map showing the project boundary and the Area of Potential Effect (APE). The APE should include indirect effects, such as visual and audible impacts. Federal Projects must provide an explanation of how the APE was determined.

PHOTOS: Photos of all buildings or structures in the APE. If the property is over 50 years old submit a Historic Resource Survey Form with this initial request. The forms are available at <http://www.phmc.state.pa.us/bhp>, under "Forms and Guidance" link.

PROJECT DESCRIPTION NARRATIVE: Provide a detailed project description describing the project, any ground disturbance, any previous land use, and age of all effected buildings in the project area. Attach a site map showing the location of all buildings in the project area.

I have reviewed all DEP Permit Exemptions listed on the DEP website [www.dep.state.pa.us](http://www.dep.state.pa.us).

**In addition, federal agencies must provide:**

Measures that will be taken to identify consulting parties including Native Americans.

Measures that will be taken to notify and involve the public.

**The information on this form is needed to determine whether potential historic or archaeological resources are present. Additional historic information or investigation may be requested to determine the significance of the resources or the effects of the project on those resources. Form and attachments must be submitted by mail. Submissions via e-mail will not be accepted.**

**Signature Block**

  
Applicant's Signature

Date 5/12/11

**Please Print and Mail Completed Form and Required Information to:**

**PA Historical & Museum Commission  
Bureau for Historic Preservation  
400 North Street  
Commonwealth Keystone Building 2<sup>nd</sup> Floor  
Harrisburg, PA 17120-0093**

# Historic Resource Survey Form

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION  
Bureau for Historic Preservation

Key # _____
ER# _____

## Name, Location and Ownership *(Items 1-6; see Instructions, page 4)*

**HISTORIC NAME** 1LT Ray S. Musselman USARC (PA068)  
**CURRENT/Common Name** 1LT Ray S. Musselman USARC (PA068)  
**STREET ADDRESS** 1020 Sandy Hill Road (Sandy Street) **ZIP** 19401  
**LOCATION** Norristown  
**MUNICIPALITY** Norristown **COUNTY** Montgomery  
**TAX PARCEL #/YEAR** 13058 005/1955 **USGS QUAD** Norristown, PA 1992  
**OWNERSHIP**  Private  
 Public/Local  Public/County  Public/State  Public/Federal  
**OWNER NAME/ADDRESS** U.S. Army Reserve, 99<sup>th</sup> RSC/5231 South Scott Plaza, Fort Dix, NJ 08640-5000  
**CATEGORY OF PROPERTY**  Building  Site  Structure  Object  District  
**TOTAL NUMBER OF RESOURCES** 2

## Function *(Items 7-8; see Instructions, pages 4-6)*

Historic Function	Subcategory	Particular Type
<u>Defense</u>	<u>Military Facility</u>	<u>Army Reserve Center</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
Current Function	Subcategory	Particular Type
<u>Defense</u>	<u>Military Facility</u>	<u>Army Reserve Center</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

## Architectural/Property Information *(Items 9-14; see Instructions, pages 6-7)*

### ARCHITECTURAL CLASSIFICATION

Modern Movement (US Army Reserve Center Standardized Design)  
\_\_\_\_\_  
\_\_\_\_\_

### EXTERIOR MATERIALS and STRUCTURAL SYSTEM

Foundation	<u>Concrete</u>	_____
Walls	<u>Brick veneer</u>	<u>EIFS</u>
Roof	<u>Unknown</u>	_____
Other	<u>CMU</u>	<u>metal</u>
Structural System	<u>Concrete - general</u>	_____

**WIDTH** 184 (feet) or \_\_\_\_\_ (# bays) **DEPTH** 152 (feet) or \_\_\_\_\_ (# rooms) **STORIES/HEIGHT** 2

Key # \_\_\_\_\_  
ER# \_\_\_\_\_

**Property Features** (Items 15-17; see Instructions, pages 7-8)

Setting Mixed use neighborhood

**Ancillary Features**

_____	_____	_____
_____	_____	_____
_____	_____	_____

Acreeage 3.5 (round to nearest tenth)

**Historical Information** (Items 18-21; see Instructions, page 8)

Year Construction Began 1959  Circa      Year Completed 1959  Circa

Date of Major Additions, Alterations 1994  Circa      \_\_\_\_\_  Circa      \_\_\_\_\_  Circa

Basis for Dating  Documentary     Physical

Explain U.S. Army Reserve Real Property Data; field investigations

Cultural/Ethnic Affiliation(s) \_\_\_\_\_

Associated Individual(s) \_\_\_\_\_

Associated Event(s) \_\_\_\_\_

Architect(s) Reisner and Urbahn

Builder(s) US Army

**Submission Information** (Items 22-23; see Instructions, page 8)

Previous Survey/Determinations \_\_\_\_\_

Threats  None     Neglect     Public Development     Private Development     Other

Explain Transfer out of federal government ownership

This submission is related to a  non-profit grant application       business tax incentive

NHPA/PA History Code Project Review     other

**Preparer Information** (Items 24-30; see Instructions, page 9)

Name & Title Benjamin A. Roberts Historian/GIS Specialist

Date Prepared May 2, 2011

Project Name Cultural Resource Survey of Musselman USARC

Organization/Company Brockington and Associates, Inc.

Mailing Address 109-A West Poplar Street, Elizabethtown, KY 42701

Phone 270-735-1600

Email benroberts@brockington.org



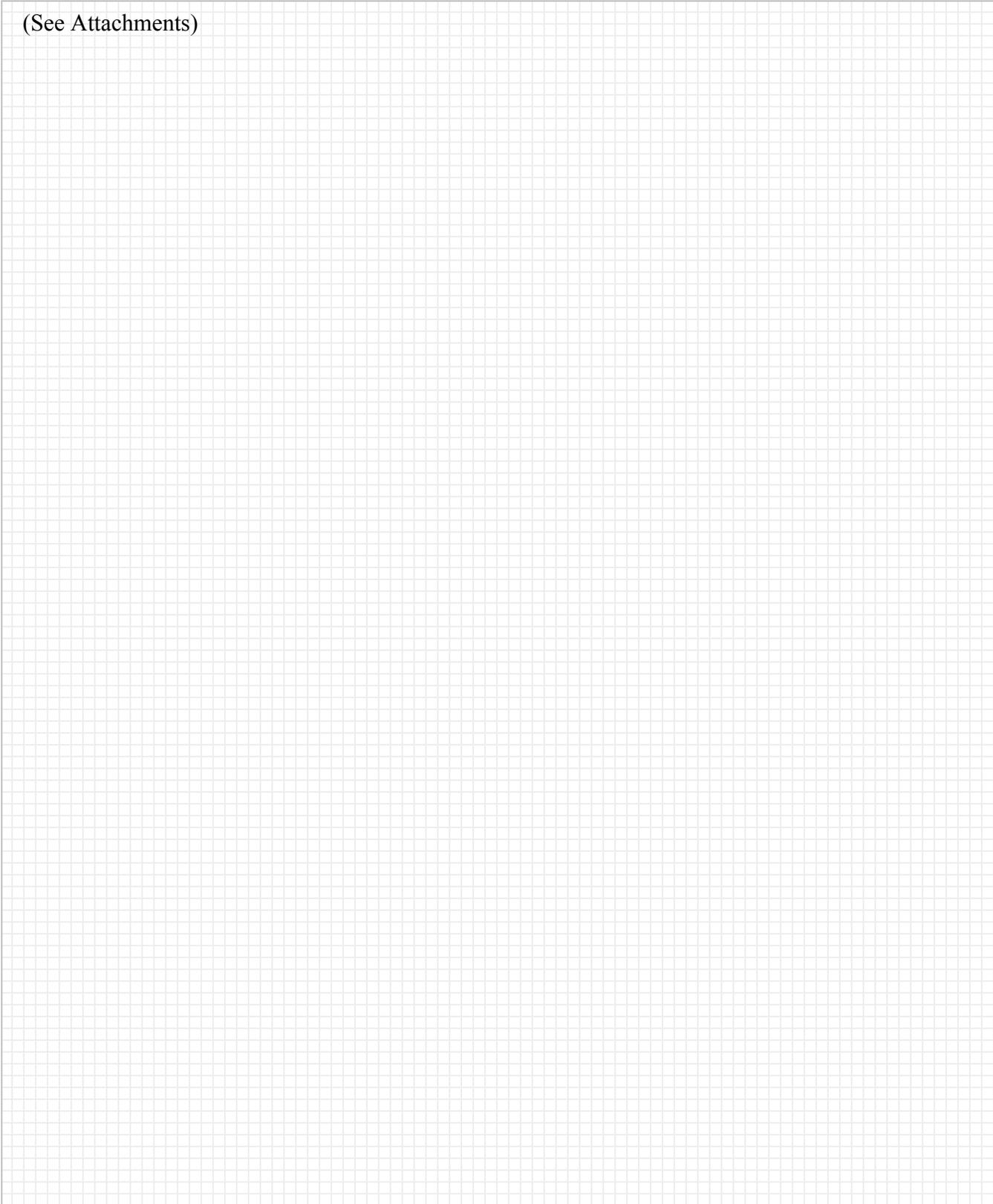


Key # _____
ER# _____

**Site Plan** (Item 34)

See page 11 of the Instructions for more information regarding the site plan. Create a sketch of the property, showing the footprint of all buildings, structures, landscape features, streets, etc. Label all resources and streets. Include a North arrow and a scale bar (note if scale is approximate). This sheet may be used to sketch a plan or another map/plan may be substituted.

(See Attachments)

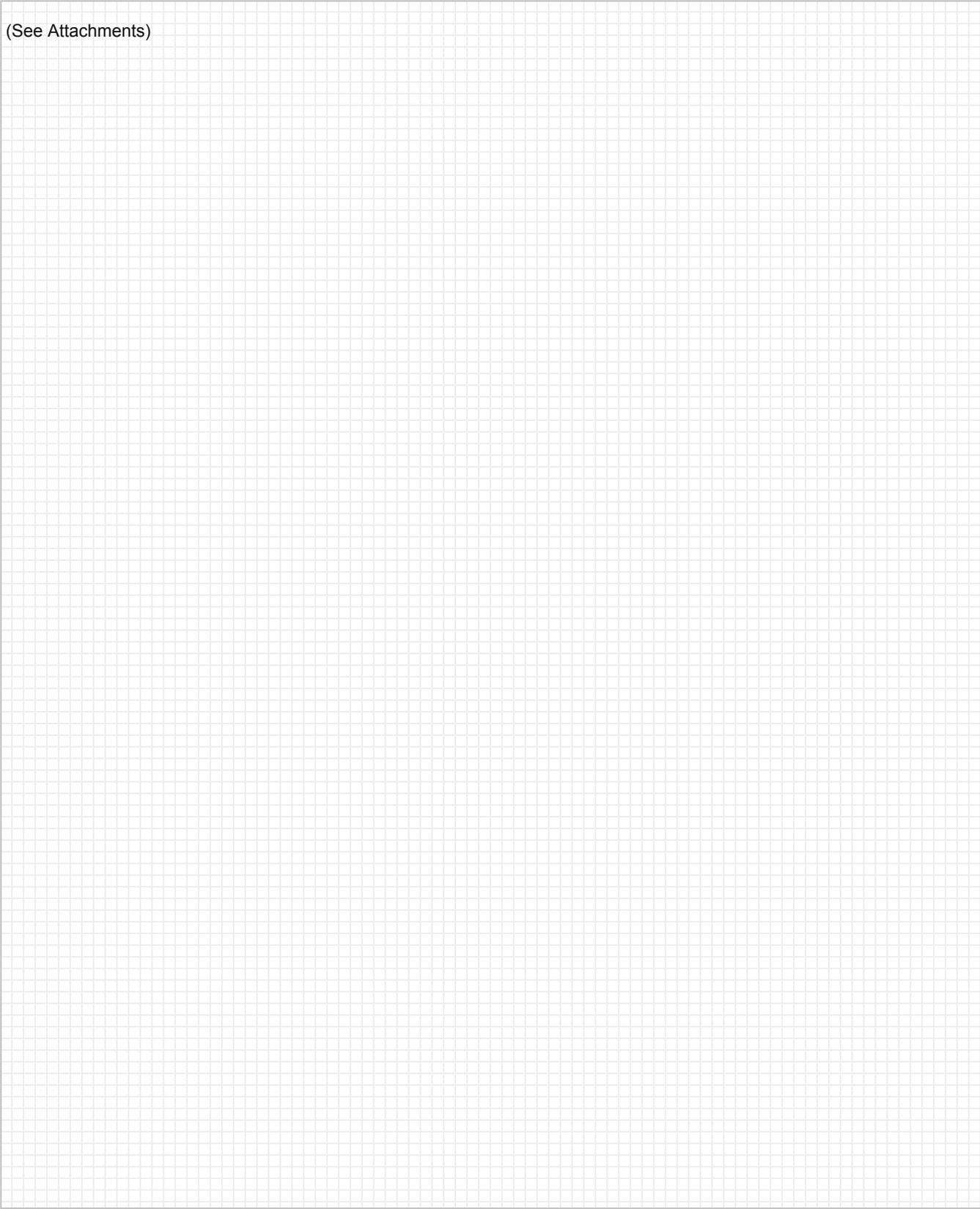


Key # _____
ER# _____

**Floor Plan** (Item 35)

See page 11 of the Instructions for more information regarding the floor plan. Provide a floor plan for the primary buildings, showing all additions. Label rooms and note important features. Note the date of additions. Include a North arrow and a scale bar (note if scale is approximate) or indicate width/depth dimensions. This sheet may be used to sketch a floor plan or another map/plan may be substituted.

(See Attachments)



Key # _____
ER# _____

## Physical Description and Integrity (Item 38)

Provide a current description of the overall setting, landscape, and resources of the property. See page 13 of the Instructions for detailed directions. Continue on additional sheets as needed. Suggested outline for organizing this section:

- Introduction [summarize the property, stating type(s) of resource(s) and function(s)]
- Setting [describe geographic location, streetscapes, natural/man-made landscape features, signage, etc.]
- Exterior materials, style, and features [describe the exterior of main buildings/resources]
- Interior materials, style, and features [describe the interior of main buildings/resources]
- Outbuildings/Landscape [describe briefly additional outbuildings/landscape features found on property, substitute Building Complex Form if preferred; See Instructions, page 18]
- Boundaries [explain how/why boundaries chosen, such as historic legal parcel, visual natural features such as tree lines, alley separating modern construction, etc.]
- Integrity [summarize changes to the property and assess how the changes impact its ability to convey significance]

---

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below; “unprotect” the document for this section, or prepare the “Physical Description and Integrity” narrative as a separate document.)

(See Attachments)

Key # _____
ER# _____

## History and Significance (Item 39)

Provide an overview of the history of the property and its various resources. Do not substitute deeds, chapters from local history books, or newspaper articles. See page 14 of the Instructions for detailed directions. Continue on additional sheets as needed.

Suggested outline for organizing this section:

- History [Summarize the evolution of the property from origin to present]
- Significance [Explain why the property is important]
- Context and Comparisons [Describe briefly similar properties in the area, and explain how this property compares]

---

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below; “unprotect” the document for this section, or prepare the “History and Significance” narrative as a separate document.)

(See Attachments)

**Historic Resources Survey Form – Current Photos (Item 33)**



**Photo-1. Facing south toward front (north) elevation of main building.**



**Photo-2. Facing northeast toward front (north) elevation of main building from northwest corner of main building.**



**Photo-3. Facing southeast toward northwestern corner of main building.**



**Photo-4. Facing south-southwest toward front (north) elevation of main building from northeastern corner of USARC property.**



**Photo-5. Facing southwest toward east elevation of 1994 addition to east end of main building.**



**Photo-6. Facing northwest toward rear (south) elevations of 1994 storage area addition to drill hall and drill hall of main building.**



**Photo-7. Facing northeast toward rear (south) elevations of 1994 storage area addition to drill hall and drill hall of main building.**



**Photo-8. Facing northeast across parking lot toward rear (south) elevation of main building.**



**Photo-9. Facing east-northeast toward rear (south) elevation of main building and 'hyphen' connecting drill hall.**



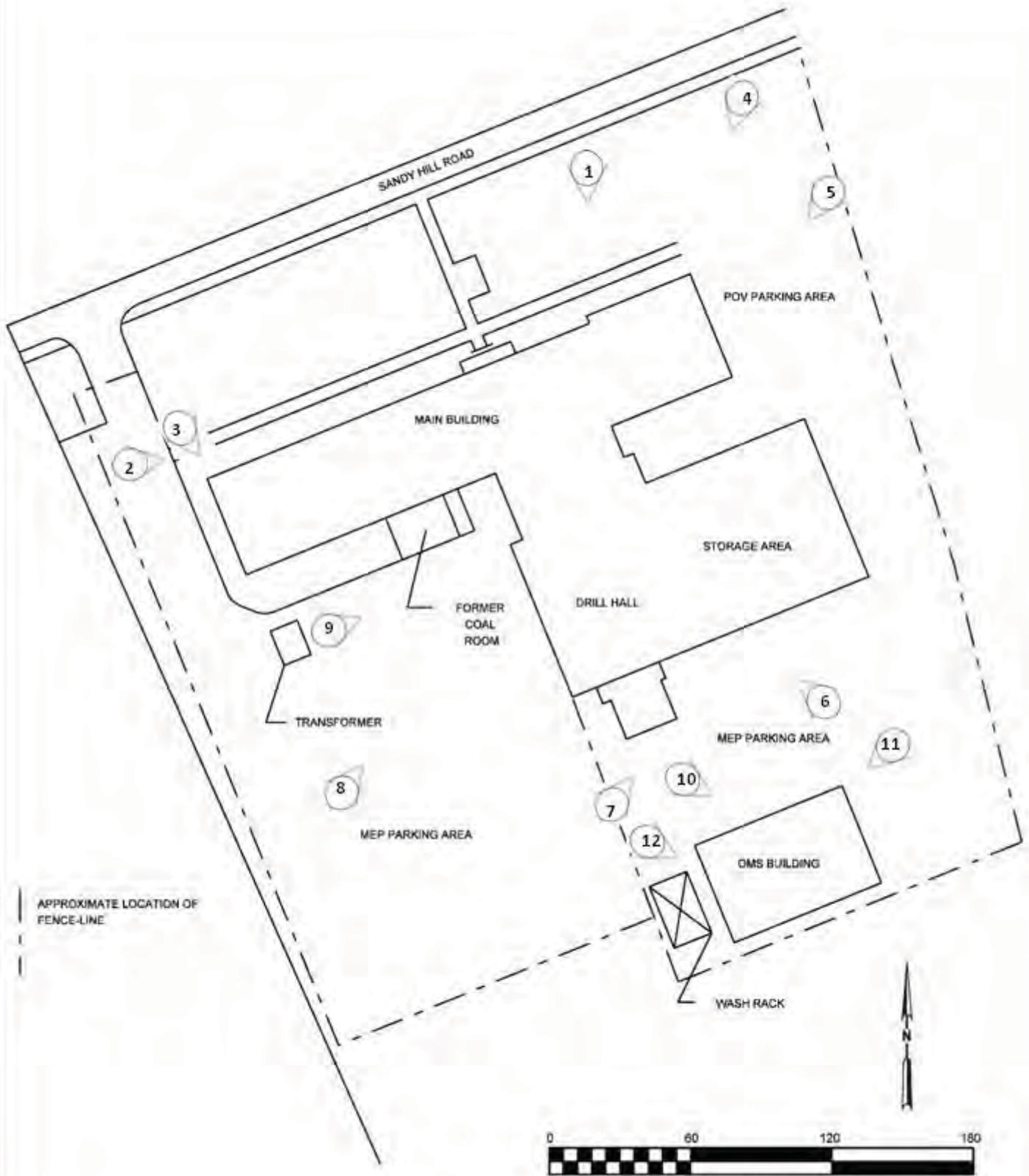
**Photo-10. Facing southeast toward front (north) elevation of OMS.**



**Photo-11. Facing southwest toward northeastern corner of OMS.**



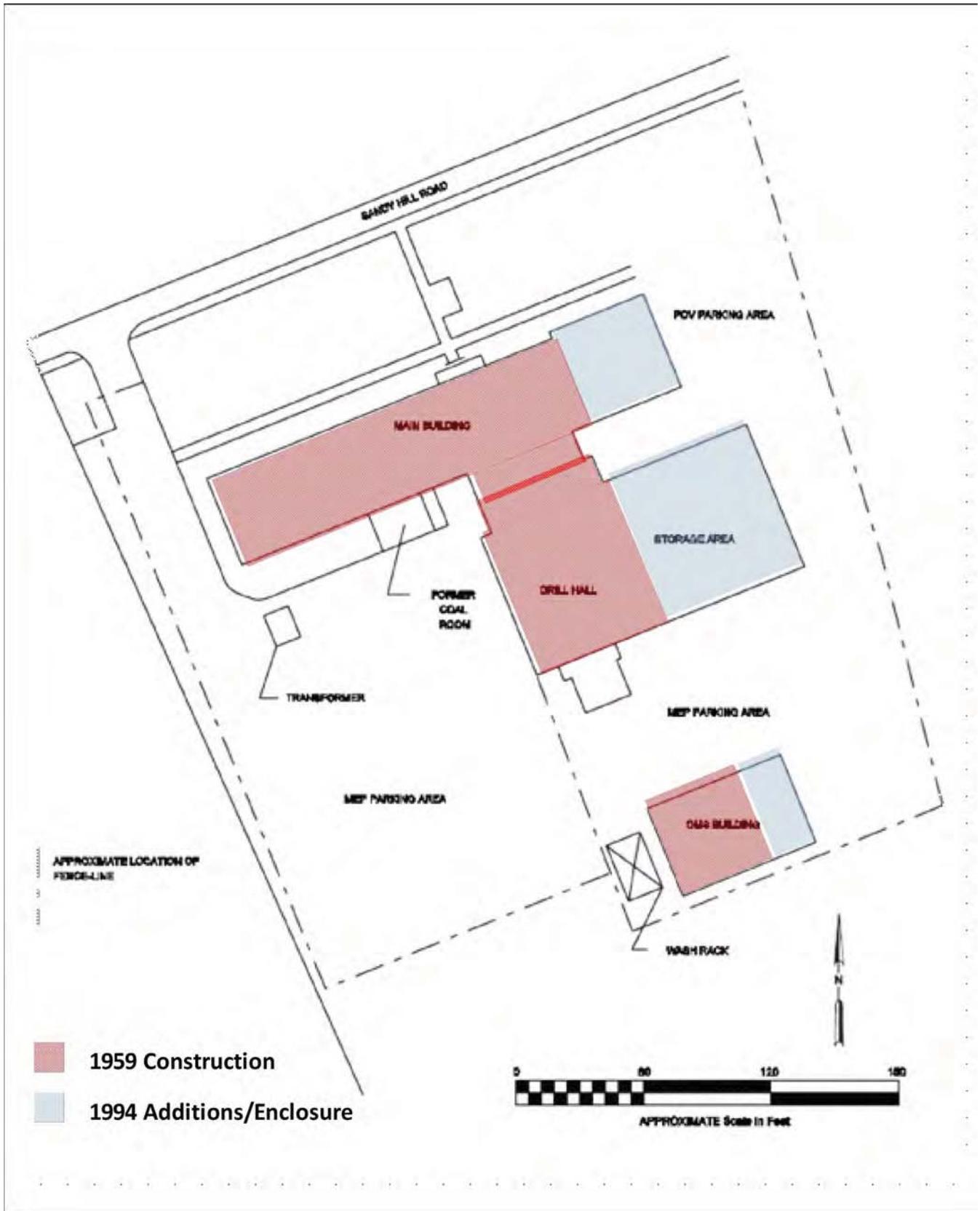
**Photo-12. Facing southeast toward west elevation of OMS.**



APPROXIMATE LOCATION OF FENCE-LINE

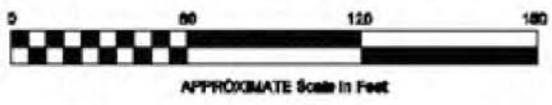


APPROXIMATE Scale In Feet



APPROXIMATE LOCATION OF FENCE-LINE

- 1959 Construction
- 1994 Additions/Enclosure



## Historic Resources Survey Form – Physical Description and Integrity (Item 38)

### Physical Description

The Musselman USARC, named after World War Two Army First Lieutenant Ray S. Musselman, is located at 1020 Sandy Hill Road (Sandy Street) in the town of Norristown, Montgomery County, Pennsylvania. Zoning information was unavailable, but the area appears to be a mix of “commercial” and “residential” zoning with residential properties surrounding the property on the south and east and commercial establishments serving the local area located to the west and north. The Musselman USARC property is bounded by Sandy Hill Road to the north and consists of approximately 3.45 acres of land with two permanent structures, an unknown number of military vehicles, small containerized shipping trailers (connexes), and three paved parking lots.

Approximately three-quarters of the 3.45 acre property is covered by impervious surface features, including asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining land is grassed with trees along the eastern and southern portions of the Musselman USARC property.

The footprint of the main building at Musselman USARC as built in 1959 resembles the *Sprawling Plan* subtype of Army Reserve Centers constructed during the Cold War. The main building at Musselman USARC is an irregular T-shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor, or ‘hyphen’. The building consists of load-bearing concrete masonry unit walls, faced with brick and stucco on the exterior. The lower level of the façade has brick facing, while the second level, side and rear elevations are faced with stucco. The entry is set asymmetrical to the façade, and is located toward the eastern portion of the north elevation. The entry consists of a series of full height fixed pane windows and a pair of metal framed glass doors, all of which represent a 1991 modification to the building’s original design. The modifications also included the replacement of the original aluminum framed windows with modern windows, with single fixed pane. The windows do, however, appear to retain the original concrete sills.

The building’s interior consists of office space, classrooms, a kitchen area, storage, a former indoor firing range (removed and converted to office space in 1994), and an assembly area commonly referred to as the drill hall. An arms vault, used to store small arms including rifles and pistols, is located on the first floor. The remaining rooms of the first floor consist of administrative offices, storage, a former firing range, and a computer server room. The second floor runs the entire length of the northern half of the main building and consists of office space, classrooms, and a conference room. The upper portion of the lobby overlooks the foyer of the main entrance.

A boiler room is located on the southern portion of the main building and is lower in elevation than the rest of first floor and houses the building’s water heater, natural gas heating units, and bypass feeder. Another room is located south of the boiler room on the first floor and is connected by a single doorway. The room is not currently in active use by Army Reserve personnel and was originally used as storage for the property’s coal-fired heating system and associated coal fuel. A steel coal chute measuring approximately three feet by two feet square is located along the southern wall of the room. The Musselman USARC property switched to natural gas heating at an unknown date, and the coal heating system was decommissioned at that time.

The drill hall is located on the southern end of the main building, and consists of a flat, built-up roof, sloping away slightly from a discrete center ridge for drainage. The south wall of the drill hall contains a roll-type door for vehicle access and a personnel door and single fixed pane windows appear on the eastern and western clerestories. The floor area of the drill hall has a thick concrete floor to support heavy military vehicles and equipment and doubles as a recreation space. Locked storage cages are located east of the drill hall in an enclosed, one-story addition completed in 1994.

Several architectural alterations were made to the exterior of the main building in the early 1990s. The facility's windows and doors were replaced with modern materials. In addition, four windows along the façade (right of the main entry) were enclosed with brick. This is evidenced by a gap in the window fenestration along the façade of the building. A one story addition was also constructed on the north end of the building, which added additional office space and a common room. This addition was constructed of load bearing concrete block masonry units, faced with brick and metal coping at the roofline. The façade of this addition projects outward from the plane of the main building. Other alterations from the 1994 modifications include an enclosed 6,264-square-foot one-story storage area addition running the entire length of the east wall of the drill hall. In addition, the stucco facing on the building does not appear to be original to the design, although no drawings were located to verify this. One indication is to compare the coping on the drill hall brick exterior with the main building's coping where it joins the stucco. Areas in which the stucco was used is flush with the coping, suggesting that the veneer was incorporated at a later date. While stucco was a material used for Army Reserve Centers during this time, it was typically used as the primary material rather than a secondary, contrasting material.

The OMS building, located to the south of the drill hall section of the main building, is a 3,850-square-foot, two-bay brick vehicle garage with a flat, built-up roof, sloping away slightly from a discrete center ridge for drainage that slightly overhangs the two metal roll-up-type doors. The interior of the OMS is separated into four vehicle maintenance bays with rows of tool chests and caged storage areas. On the northeastern side of the OMS are two offices, a restroom, an electrical closet, and a communications (COMMO) storage room that stores communication equipment. Alterations to the OMS include the enclosure of one of the bays at an unknown date. This enclosure likely allowed for the creation of the interior offices.

The only other structures on the Musselman USARC property are several small containerized shipping containers known as connexes. These are mainly located along the southern and western edges of the rear parking lot of the Musselman USARC property. These structures are small and mobile, and are only used for temporary storage.

### **Integrity**

Chapter 4 of *Blueprints for the Citizen Soldier* (Moore et al. 2008) provides a framework for evaluating the relative significance of Army Reserve Centers from a national perspective and provides the basis for assessing the eligibility of Army Reserve Centers for inclusion in the NRHP. According to Moore:

As stated in National Register Bulletin No. 15, 'Integrity is based on significance: why, where, and when a property is important.' The character-defining physical features that made up the resource's appearance during its historic period of significance must be

recognizable for it to retain sufficient integrity to be eligible for the NRHP. Since Sprawling Plan Army Reserve Centers are part of a nationwide building program and are common throughout the United States, an extant example must retain ALL of the following character-defining features to be eligible for inclusion in the NRHP.

Army Reserve Centers that fall under the Sprawling Plan subtype may be eligible for listing in the NRHP under Criterion A in the area of military history for their associations with President Eisenhower’s “New Look” Program and the National Defense Facilities Act of 1950 (PL 783, 81st Congress). As analyzed in the discussion for the Compact Plan subtypes, these historical factors played an important role in the history and development of the building program associated with the Army Reserves during the early and middle 1950s and extant examples of the Sprawling Plan subtype may be significant within that context. Although individual Army Reserve Centers may be eligible for the NRHP under Criterion B for their association with significant individuals, those associations would be applicable at a local level and would have to be researched and documented on an individual, center-by-center basis. At the national level, however, no significant associations under Criterion B have surfaced. Sprawling Plan Army Reserve Centers may also be eligible for inclusion in the NRHP under Criterion C in the area of architecture for their physical attributes and the quality of their design. Architecturally, they are associated with the influence of the Modern Style, which enjoyed widespread popularity among architects in the design of federal buildings in the 1950s. The type also is significant under Criterion C because the expansible and flexible nature of the plans documents the military’s vision for a changing Army Reserve Force and increasingly important role that the Reserves filled in the nation’s defense and military preparedness (Moore et al. 2008: 173).

The following table shows the character defining architectural features must be in place to consider the Musselman USARC eligible for the NRHP for its association with the Sprawling Plan subcategory of USARC construction under Criteria A, B, or C. These character defining features were developed in *Blueprints for the Citizen Soldier* (Moore et al. 2008):

<b>ALL CHARACTER DEFINING FEATURES MUST BE INTACT FOR NRHP ELIGIBILITY*</b>	
<b>CHARACTER DEFINING FEATURE</b>	<b>INTACT AT Musselman USARC?</b>
Follows 1952, 1953, or 1956 standard plan	Yes
Retains original “sprawling” footprint with asymmetrical T- or L-plan	No
Additions follow “expansible” design on original standard plan	No
Original flat roof form over classrooms	Yes
Original low-pitched roof form over assembly wing at rear	Yes
Original fenestration pattern intact	No
Front entrance with original metal door/sidelight/transom assembly	No
Cantilevered canopy, if original	N/A
Original “masonry units,” brick veneer, or historically appropriate stucco veneer on exterior walls	No
Original doors and windows or compatible replacement doors and windows that meet the <i>Secretary of Interior’s Standards for Rehabilitation</i>	No
Clerestory windows in assembly wing	Yes <sup>1</sup>
Original configuration of interior corridor and lobby space	Yes
Presence of flexible accordion partitions, if original, or opening in wall where accordion partition was originally located	Unknown
Double-height open interior space in assembly wing at rear	Yes
Overhead rolling door at assembly wing	Yes

Historic-age maintenance shop, if original	Yes <sup>2</sup>
Integrity of setting intact	Yes
<b>DETERMINATION OF NRHP ELIGIBILITY</b>	<b>NOT ELIGIBLE</b>

\* Adapted from Moore et al. 2008: 179

<sup>1</sup> Windows present but replaced with modern materials

<sup>2</sup> Enclosure of one bay, circa 1994

## Historic Resources Survey Form – History and Significance (Item 39)

### Site History

Historic maps and aerial photographs, dating to as early as 1895, show the Musselman USARC property as undeveloped land prior to Federal ownership. These maps show no pre-military structures present on the property. The first recorded owner of the parcel on which the Musselman USARC is now located was Mary Newbold Cooke in 1920. Mary Newbold Cooke's daughter, Ellen Newbold Jacobs, inherited the property in 1926. Ellen Jacobs then sold the property to William A. Steinbach in two parts in 1954 and 1955. The *Declaration of Taking* of the 3.45 acre parcel between William A. Steinbach and the Federal Government took place on September 27, 1955. The literature review, including historic maps and aerial photography, suggests that the entire 3.45-acre parcel was undeveloped agricultural land before 1955. The following detailed property history was extracted from the ECP Report (USACE-Louisville 2007: 2.3; 3.1-3.2).

The Musselman USARC property has primarily functioned as an administrative, logistical, and educational facility, with limited maintenance of military vehicles occurring in the OMS building. The property was historically used by reservists for drill activities on various weekends throughout the year. The 358th Civil Affairs Brigade is the current resident unit using the Musselman USARC. Activities inside the OMS building were limited to preventative maintenance checks and light maintenance activities. Any equipment requiring heavier maintenance was sent to the Area Maintenance Support Activity (AMSA) shop located at the Willow Grove Naval Air Station/Joint Reserve Base (NAS/JRB).

Based on a 1942 aerial photograph, the property and surrounding land were open fields or were used for agricultural purposes. It appears as though a house and a barn were located on the lot directly west of the property. The house and barn are no longer extant.

The USAR Center first appears in a 1958 aerial photograph. In the image, the main building is present, but the OMS building is not. The current location of the personally owned vehicle (POV) lot, on the northeast side of the property, appears to be a different color than the military equipment parking (MEP) lot south of the main building. This may indicate that the POV lot was not paved in 1958. In addition, residential neighborhoods appear to the north and east. West of the property, the house noted in the 1942 aerial photograph is no longer present, and a commercial building is in its place.

In aerial photographs dating from 1965 through 1992, both the main and OMS buildings are present on the property. The surrounding properties appear unchanged with the exception of more commercial buildings west of the property. In 1973, a residential neighborhood appears directly south of the property, and several vehicles appear in the MEP lot.

In addition to historical aerial photographs, historical USGS topographical maps from 1895, 1952, 1966, 1973, and 1992 were reviewed. A review of these maps indicates the same progression of development of the property and surrounding areas as the historical aerial photographs. The property appears undeveloped in a 1952 topographic map. The property first appears in a 1966 map and is referred to as "Armory." A 1973 topographic map shows additional residential streets south of the property.

### **Historic Context**

The United States Army Reserve (USAR) is a Federal military organization distinct from the full-time professional Regular Army and the state National Guard. The USAR is maintained as a source of personnel to rapidly support Regular Army ranks in the event of conflict. The Reserve is composed of 'citizen-soldiers,' civilians committed to a period of duty in exchange for benefits and pay. Reservists meet regularly at Reserve Centers, where Army training staff instructs them in procedure and in the use of equipment. Periodic intensive training occurs at weekend drills and summer camps.

Although the context of the Korean War and Eisenhower administration policies intersected with the construction of the initial wave of Army Reserve Centers, a multi-year construction program had already been set in motion by the passage of the National Defense Facilities Act of 1950. Army Reserve Centers, as opposed to earlier armories, were designed in response to the programmatic needs of the modern Army, and included classrooms and laboratory spaces rather than just space for drills and social activities. Broad policies affecting the strength of the reserves did influence how the Army assessed its need for facilities and where those facilities would be located. Eisenhower's New Look program also influenced the type of training that would occur in the Army Reserve Centers, which affected the form and function of the buildings.

The form and program of spaces needed for the proposed new Army Reserve Centers responded to the functions that the buildings would serve. Traditionally, armories constructed before World War II had provided arms storage space and a drill hall, and maybe a social club room. Their imposing, high-style architectural design communicated security and social stability. With the emphasis on technology under the New Look program, the proposed new Army Reserve Centers needed to provide space for a wider variety of training- and instructional-related activities. Classrooms, laboratories, and maintenance shops were required in addition to the traditional need for arms storage and drill halls. New Army Reserve Centers would need to function as friendly, approachable representations of the Army in local communities. While traditional armories had used high architectural styles, the new Army Reserve Centers would need to recruit reservists from all walks of life, and therefore their architectural design would need to be accessible, simple, modern, and conservative.

In 2008, Hardy Heck, Moore (HHM), Inc. prepared Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers for the Department of Defense Legacy Resource Management Program (Moore et al. 2008). The study identified and categorized the various resource types associated with the historical development of U.S. Army Reserve Centers, concentrating on the post World War II and early Cold War eras, and provides a historic context that can be used to evaluate them for eligibility for listing in the

NRHP. Resource types associated with the Early Cold War period, during which the Musselman Memorial USARC was constructed, were further divided into three categories by plan type and named accordingly as the 'Compact Plan,' the "Sprawling Plan,' and the "Vertical Plan."

### **Significance**

The 2008 Historic Context (Moore et al, 2008: 173) establishes broad contexts and specific themes and examples under each of the three Criteria for NRHP eligibility applicable to architectural resources. National, State, and local significance under each Criterion, and theme, as appropriate, are discussed below.

#### Criterion A (Military)

National Level: "An Army Reserve Center that meets National Register Criterion A in the area of military significance is associated with the role of the Army Reserves in significant military strategies and/or conflicts...The mere association of an Army Reserve Center with the theme of military significance is not enough to meet Criterion A. For example, activities within a particular Reserve Center would need to be shown as significant in military history. Although all Army Reserve Centers are related to the broad development of the Army Reserve, this historic trend is not significant at a national level" (Moore et al, 2008: 140).

The Musselman USARC does not meet Criterion A for military significance. During the Cold War era, the functions performed at this facility and other USARCs nationwide were historically that of routine classroom-based training and vehicle maintenance. The Historic Context study mentions that a USARC may be eligible for Criterion A for military significance if it has a significant association with the development of the Eisenhower Administration's New Look Program (Moore et al, 2008: 141). This policy envisioned smaller conventional forces, backed up by massive nuclear deterrence. The Musselman USARC was not associated with any nuclear missile sites or nuclear warfare training.

The Musselman USARC does not have any direct association with significant military strategies or conflicts. The Musselman USARC was not directly associated with the development of the Organized Reserve Corps. Further, the Musselman USARC was constructed outside the period of significance established for association with the military policies proposed by Emory Upton and Elihu Root.

State/Local Level: The Musselman USARC does not meet Criterion A for military significance at a state or local level. The Musselman USARC was established as part of a national federally-funded program that by its very definition resulted in the construction of single Reserve Centers in communities throughout the country. The Historic Context Study notes that the existence of a single Reserve Center in a town like Norristown, does not qualify it as eligible under Criterion A. Unlike the National Guard, the Army Reserve does not have a local or state mission. Reservists respond only in times of international conflicts. Because of the Army Reserve's mission, USARCs would not have military significance at the state or local level.

The Musselman USARC was built to only accommodate a specific number of Reservists at a time. The Historic Context Study mentions that locations of USARCs were chosen mainly for their proximity to major highways and roads. The Musselman USARC location is consistent with

this trend. Reservists report to USARCs located near their homes. Reservists would already have been community members of Norristown or Montgomery County and the surrounding towns. The Musselman USARC only employed approximately 30 full-time staff members consisting of active and retired Reservists and civilians. Most of the activity at the Musselman USARC consisted of vehicle maintenance and classroom instruction on weekends. No more than a few hundred Reservists would have reported to the Musselman USARC on any given weekend. For these reasons, the activity at the Musselman USARC would not have significantly contributed to the economic growth or planned community development of Norristown/Montgomery County since the Reservists were already members of the community.

#### **Criterion A (Politics/Government)**

National Level: "An Army Reserve Center might be eligible for the NRHP under Criterion A in this area of significance at the national level if it were the site of organizational meetings that substantially contributed to the development of the Reserve Officer's Association (ROA)-driven legislation such as the Reserve Officers Personnel Act of 1954 or the Reserve Bill of Rights and Vitalization Act of 1967" (Moore et al, 2008: 141).

The Musselman USARC does not meet Criterion A for an association with politics or government. ROA legislative priorities and policies are handled at the Washington, DC national headquarters and discussed with member representatives of each state at an annual national convention. This national convention is held most often in Washington, DC. The ROA was contacted for the purposes of this determination and there is no evidence to suggest that the Musselman USARC or any other USARC of this size would have played a significant role in the development of the Reserve Officers Personnel Act of 1954 or Reserve Bill of Rights and Vitalization Act of 1967 (ROA, 11/18/2010). No evidence was found to suggest that the Musselman USARC would have served any local government or political role as it was a facility owned and operated by the federal government.

#### **Criterion B**

National Level: An Army Reserve Center that meets National Register Criterion B is likely to be significant in the area of military history because of associations with an individual who had played a pivotal role in shaping military strategy and decisions. However, it is important to determine not only whether the individual made significant contributions to military history, but also how the Army Reserve Center is linked to the individual and his or her accomplishments. To be eligible for the NRHP under Criterion B in the area of military significance, an Army Reserve Center must be associated with an individual who achieved significance while affiliated with the Army Reserve Center in question. Furthermore, the significance of the individual must also represent a pivotal point within the nationwide historic context of the Army Reserve. (Moore et al. 2008: 142).

No individual who has made contributions to military history on a national level, whose significance represents a pivotal point within the nationwide historic context of the Army Reserve or who achieved significance while affiliated with the Musselman USARC have been identified. Therefore, the Musselman Memorial USARC is not considered significant under Criterion B on a national level.

State Level: For an Army Reserve Center to be eligible under Criterion B at the state level, the associated individual must be instrumental in the development of the Army Reserve within that state. Naming an Army Reserve Center after a significant individual does not necessarily make the USARC eligible for the NRHP under Criterion B. The association between the significant individual and the Army Reserve Center must be demonstrated to be significant in most cases, it is the single resource most closely associated with the life and accomplishments of the significant individual (Moore et al. 2008: 142).

No individual who was instrumental to the development of the Army Reserve within Pennsylvania has been identified. Therefore, the Musselman Memorial USARC is not considered significant under Criterion B on a state level.

Local Level: For an Army Reserve Center to be eligible under Criterion B at the state or local level, the associated individual must be instrumental in the development of the Army Reserve within that state or community, and a localized historic context must be developed to evaluate significance. Naming an Army Reserve Center after a significant individual does not necessarily make the Army Resource Center eligible for the NRHP under Criterion B. The association between the significant individual and the Army Reserve Center must be demonstrated to be significant; in most cases, it is the single resource most closely associated with the life and accomplishments of the significant individual. (Moore et al. 2008: 142).

No individual who was instrumental to the development of the Army Reserve within Norristown or Montgomery County, Pennsylvania has been identified. Therefore, the Musselman Memorial USARC is not considered significant under Criterion B on a local level.

### **Criterion C**

National Level: Sprawling Plan Army Reserve Centers constructed as part of the early Cold War nationwide construction campaign may be eligible for inclusion in the NRHP under Criterion C in the area of architecture for their physical attributes and the quality of their design. Architecturally, they are associated with the influence of the Modern Style, which enjoyed widespread popularity among architects in the design of federal buildings in the 1950s. The type also is significant under Criterion C because the expansible and flexible nature of the plans documents the military's vision for a changing Army Reserve Force and increasingly important role that the Reserves filled in the nation's defense and military preparedness. The presence of function-specific technical spaces like communications shops and labs in this subtype is significant as well, because it reflects the military strategy codified in the Reserve Forces Act of 1955, which aimed to tap professional and technical expertise while allowing Reservists the flexibility to participate in the civilian economy. The period of significance for Sprawling Plan Army Reserve Centers dates from ca. 1952 to ca. 1964.

Comparative information on other nationwide U.S. Army Reserve properties constructed during the same period as the Musselman USARC was excerpted from the Historic Context Study (Moore et al. 2008: 202-203).

"A total of 536 new Army Reserve Centers were funded between 1959 and 1965. About 50 percent of the present-day inventory of Army Reserve Centers was constructed between 1959 and 1969, with higher concentrations of buildings from this era located in the Midwestern and western states and lower concentrations in the eastern states. Buildings constructed during this period do not show the same degree of consistency and standardization as buildings constructed from 1950 through 1958. As late as 1964, some Army Reserve Centers were constructed using the preexisting standardized plans designed by Urbahn, Brayton, and Burrows. A preliminary review of extant examples of Army Reserve Centers built from 1959 to 1969 indicates that most have experienced alterations. In many cases, original windows and doors have been replaced.

Only two permanent buildings located on the Musselman USARC property meet the basic age criteria, 50 years, to be considered for inclusion in the NRHP. These include the main building and the OMS.

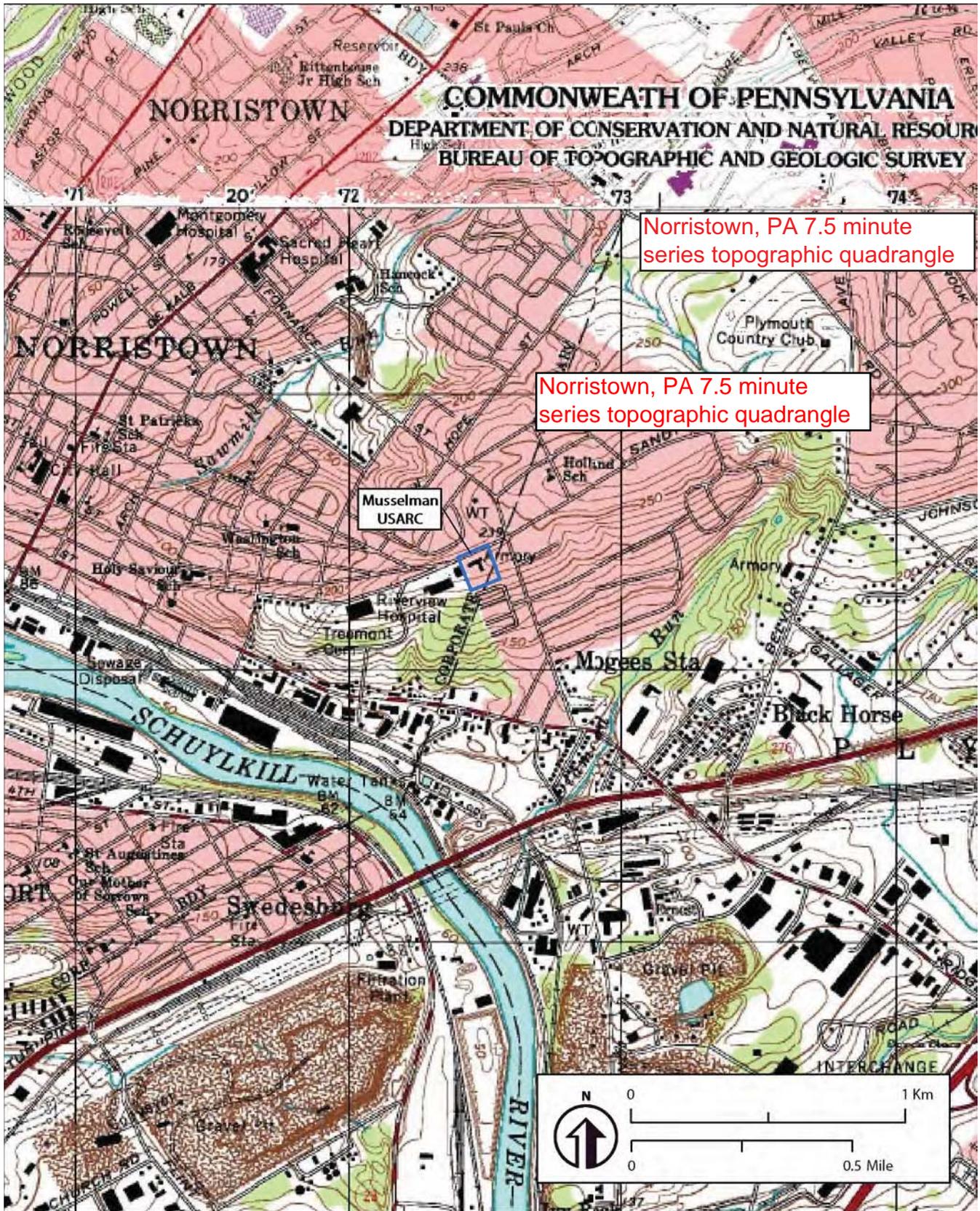
With the additions and alterations to the main building in 1994, the character defining features that would make the structure eligible for the NRHP under the criteria for the Sprawling Plan subtype explained above do not meet the minimum age requirement, nor do they represent an "exceptional" significance waiving the 50-year requirement are no longer present. The replacement of the windows and doors and the enclosure of windows significantly changed the façades of the main building's façade and fenestration pattern original character causing it to lose any historic integrity it once had. Furthermore, the construction of a one-story addition on the north elevation of the main building and the large addition to the north end of the drill hall altered the original T-shaped footprint of the building, a key feature of the Sprawling Plan subtype of U.S. Army Reserve Center design. Because it lacks historic architectural integrity, the main building is not eligible for inclusion in the NRHP.

Although the age of the OMS qualifies it for inclusion in the NRHP under the minimum age requirement, the building lacks integrity because of the alterations that occurred during the early 1990s. Further, the 2008 Historic Context Study states, "Resources within this property type [support building] are not likely to be eligible for the NRHP on an individual basis because they lack historical and/or architectural significance to meet any National Register Criteria. If the associated Reserve Center lacks significance or integrity to be eligible for the NRHP, support buildings and structures likewise are not eligible for the NRHP" (Moore et al. 2008: 193). Because the main building at the Musselman USARC is not eligible, neither are the support buildings inclusive of the OMS Building.

Archival research did not identify any additional significant national, state, or local associations with the main building, the OMS, or any other structure located on the Musselman USARC property. The Musselman USARC does not possess military significance at the state or local level under Criterion A. It was established as part of a national federally-funded program that resulted in the construction of individual reserve centers in communities throughout the country. The Musselman USARC is one of at least 34 Reisner and Urbahn Army Reserve Centers in Pennsylvania constructed between 1952 and 1964, and the Sprawling Plan is the most common design constructed in the state during the 1950s and 1960s. In addition, unlike the National Guard, the Army Reserve does not have a local or state mission. Reservists respond only in times of international crisis. Additionally, the Musselman USARC was built to accommodate 400 Reservists at a time and the Historic Context Study (Moore et al. 2008)

mentions that USARC locations were chosen mainly for proximity to major transportation corridors for easy access by Reservists. The USARC would have employed existing Reservists in the area and most of the activity would have been limited to the weekends. For these reasons, the Musselman USARC would not have contributed significantly to economic growth or planned community development of the Norristown area. Under Criterion B, a USARC must be associated with an individual that was instrumental in the Army Reserve within that state (Moore et al. 2008). Merely naming a USARC after a significant individual does not render it NRHP eligible. As in the case of the Musselman USARC, many USAR facilities are named after local fallen heroes. Born in the Norristown area in 1927, 1LT James W. Musselman was killed in action in Europe in March 1945 and is buried in the Henri-Chapelle American Cemetery in Belgium. 1LT Musselman was awarded the Purple Heart and Silver Star for his actions during World War Two.

Based on its lack of architectural integrity and the lack of significant historical associations, the buildings and structures at the Musselman US Army Reserve Center are not eligible for inclusion in the NRHP.



Norristown, PA 7.5 minute series topographic quadrangle

Norristown, PA 7.5 minute series topographic quadrangle



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

MAR 24 2011

The Historical Society of Montgomery County  
1654 DeKalb Street  
Norristown, PA 19401

Dear Interested Party,

Consistent with the recommendations of the Base Realignment and Closure Commission, the U.S. Army Reserve 99th Regional Support Command (RSC) is proposing the closure and disposal of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (USARC) located at 1020 Sandy Hill Road in Norristown, Pennsylvania. The Army proposes disposal of this property through a public benefit conveyance for educational purposes to the Norristown Area School District. The purpose of this letter is to determine your interest in participating in consultation per Section 106 of the National Historic Preservation Act of 1966.

Construction of the 35,496-square-foot administration building and the 3,850-square-foot four-bay Organizational Maintenance Shop (OMS) building was completed in 1959 and subsequently renovated in 1994. Attachments 2, 3, and 4 provide an aerial photograph of the area of potential effect (standard 1/4 mile surrounding the site was used), an aerial photograph of the structures at the site, and photographs of the structures, respectively. Two military equipment parking (MEP) areas and a privately owned vehicle (POV) parking area also are contained within the property. Most of the property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining land is grassed with trees along the eastern and southern portions of the property. The U.S. Army's 465th Transportation Company and a platoon-sized element of the 444th Human Resources Company are assigned to the Musselman USARC.

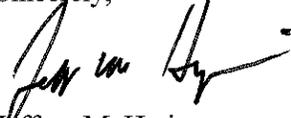
The U.S. Army Reserve 99th RSC *Integrated Cultural Resources Management Plan 2009 – 2014* (dated September 2009) summarized that no previous archaeological surveys have been performed. In January 2011 the 99<sup>th</sup> RSC conducted a cultural resources survey which determined the site potential for archeological resources was low due to the vast amount of impervious surfaces and aerial photograph review. The 99<sup>th</sup> RSC is also currently performing an architectural survey to determine the eligibility of the Musselman USARC for listing in the National Register of Historic Places. We are also working on the preparation of a determination of effect regarding the proposed transfer of the property out a federal ownership.

At this time, the Army respectfully requests within 30 calendar days from the date on this letter:

- Any information you can share concerning historical properties, traditional cultural properties, or sacred sites located within the project area, and
- Confirmation if you wish to voluntarily participate in Section 106 consultation.

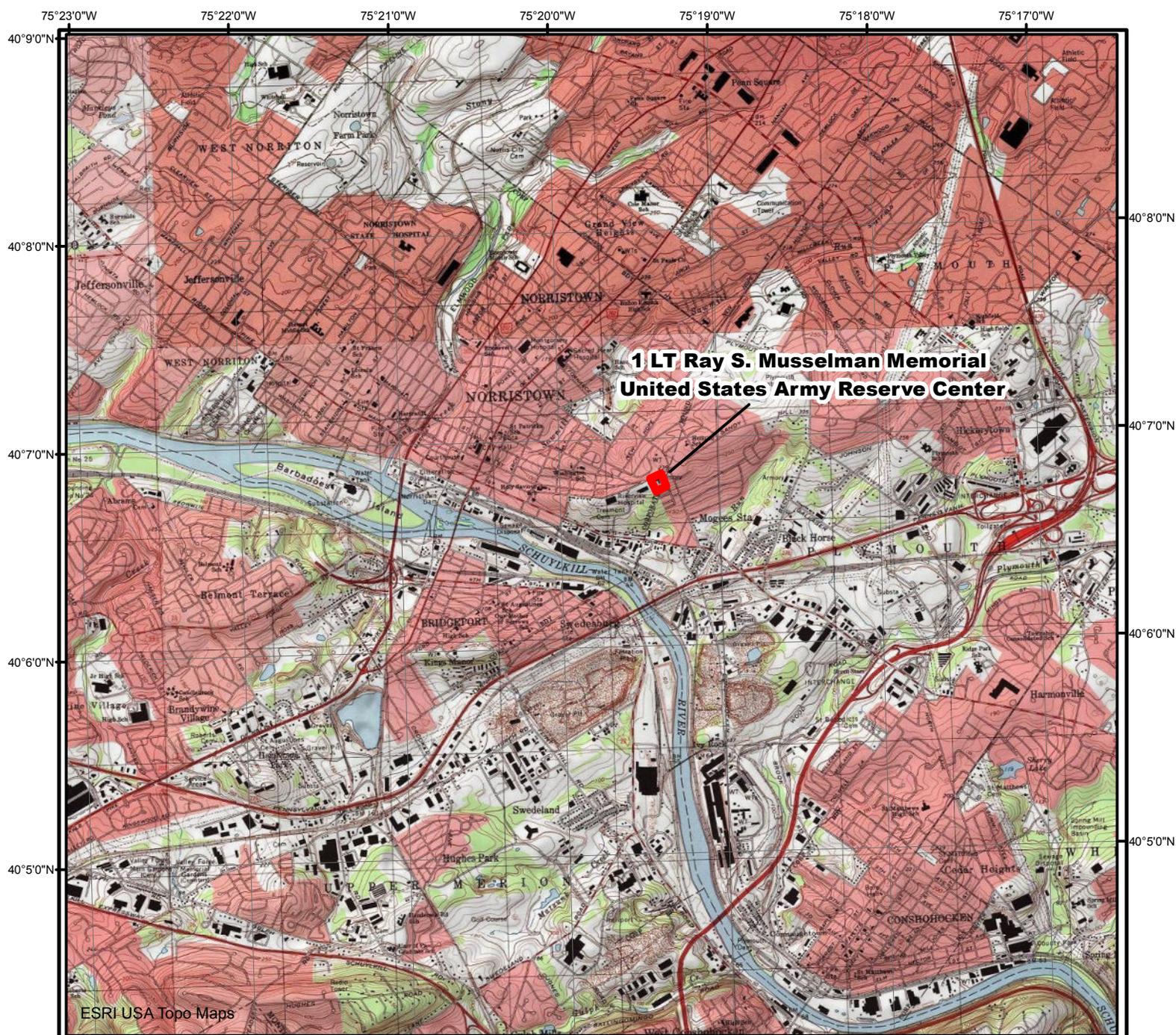
Please submit your written comments to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix NJ 08640 or by email at [amanda.w.murphy@usar.army.mil](mailto:amanda.w.murphy@usar.army.mil). If you have any questions please contact Ms. Murphy at 609-521-8047. We look forward to working cooperatively with you to make this important project successful for all parties involved.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff M. Hrzic". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeffrey M. Hrzic  
Chief, Environmental Division

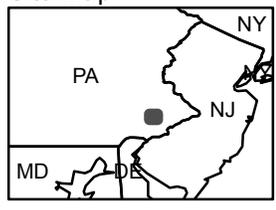
*Enclosures*



**1 LT Ray S. Musselman Memorial  
United States Army Reserve Center**

ESRI USA Topo Maps

**Site Map**



**Legend**

 Musselman USARC Boundary



0 2,000 4,000 6,000 8,000 Feet

0 500 1,000 1,500 2,000 Meters

USARC United States Army Reserve Center

Prepared For:  
U.S. Army Corps of Engineers, Mobile District

Attachment 1  
Musselman USARC Location Map





**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

MAR 31 2011

Mr. George Blanchard  
Governor  
Absentee-Shawnee Tribe of Indians of Oklahoma  
2025 South Gordon Cooper Drive  
Shawnee, OK 74801

Governor Blanchard,

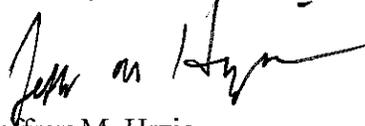
The U.S. Army Reserve 99<sup>th</sup> Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (Musselman USARC) located in Norristown, Pennsylvania. The Army proposes transfer of this property from Government ownership for local reuse and development after closure. The EA is being prepared in accordance with the National Environmental Policy Act of 1969 (NEPA). Per regulations for implementing NEPA (40 Code of Federal Regulations Parts 1500-1508), the preparation of the EA is coordinated with required compliance and consultation for the National Historic Preservation Act (NHPA) of 1966. If this action is of interest to you, we would like to initiate consultation pursuant to Section 106 of the NHPA.

The purpose and need of the proposed action is to meet the requirements of the Defense Base Closure and Realignment Act. The USARC is located on a 3.45-acre parcel in the southeast side of Norristown, Montgomery County, Pennsylvania and contains two permanent structures and three parking lots (Attachment 1). Construction of the 35,496-square-foot administration building and the 3,850-square-foot four-bay Organizational Maintenance Shop (OMS) building was completed in 1959 and subsequently renovated in 1994. Attachment 2 provides an aerial photograph of the area of potential effect (standard 1/4 mile surrounding the site was used). Two military equipment parking (MEP) areas and a privately owned vehicle (POV) parking area also are contained within the property. Most of the property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining land is grassed with trees along the eastern and southern portions of the property.

As part of this EA, the 99<sup>th</sup> RSC conducted a cultural resources survey in January 2011 which determined the site potential for archeological resources was low due to the vast amount of impervious surfaces and aerial photograph review. This letter is meant to determine your interest in participating in the Section 106 consultation process for this project. At this time, the Army respectfully requests any information you can share concerning traditional cultural properties or sacred sites located within the project area to assist us in our decision-making process. We welcome your input on this project.

Your response is requested within 30 calendar days from the date on this letter. Pertinent information received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99<sup>th</sup> RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix NJ 08640 or by email at [amanda.w.murphy@usar.army.mil](mailto:amanda.w.murphy@usar.army.mil). If you have any questions, please contact Ms. Murphy at 609-521-8047. We look forward to working cooperatively with you to make this important project successful for all parties involved.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey M. Hrzic". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffrey M. Hrzic  
Chief, Environmental Division

Attachment 1 – Musselman USARC Location Map

Attachment 2 – Musselman USARC Aerial Photograph - Area of Potential Effect

2011-0587



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND  
5231 SOUTH SCOTT PLAZA  
FORT DIX, NJ 08640-5000

MAR 1



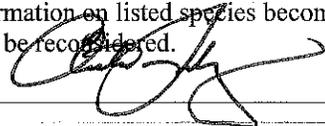
U.S. FISH AND WILDLIFE SERVICE

Pennsylvania Field Office  
315 South Allen Street, Suite 322  
State College, Pennsylvania 16801-4850



Ms. Carole Copeyon  
Endangered Species Program  
United States Fish and Wildlife Service  
Pennsylvania Field Office  
315 South Allen St., Ste 322  
State College, PA 16801-4850

No federally listed species under our jurisdiction is known or likely to occur in the project area. This determination is valid for two years. Should project plans change, or if additional information on listed species become available, this determination may be reconsidered.

, Supervisor 4/6/11

Ms. Copeyon,

The U.S. Army Reserve 99<sup>th</sup> Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial United States Army Reserve Center (Musselman USARC) located in Norristown, Pennsylvania. The EA is being prepared in accordance with the Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651. NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your Agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action. Your participation in this process is greatly appreciated.

The purpose and need of the proposed action is to meet the requirements of the Defense Base Closure and Realignment Act. The Musselman USARC is a 3.45-acre parcel located in Norristown, Pennsylvania (Attachment 1). Since 2007, the current occupying units of the Musselman USARC are the U.S. Army's 465<sup>th</sup> Transportation Company and a platoon-sized element of the 444<sup>th</sup> Human Resources Company.

The Musselman USARC contains two permanent structures (a main administration building and an Organizational Maintenance Shop [OMS]) and three parking lots. Most of the property is covered by impervious surface material, including asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining surface area is grassed, with trees planted along the southern and eastern portions of the property. The OMS is used mostly for storage, but has four vehicle-maintenance bays and several small offices. The maintenance bays are not used for heavy maintenance since there is no appropriate drainage system to handle wastewaters, such as floor drains or wash racks. Typical OMS tasks include tire and oil changes, minor repairs, and preventative maintenance for wheeled vehicles.

Three alternatives are being analyzed in the EA: 1) No Action Alternative; 2) Caretaker Status ; and 3) Disposal and Reuse (the Army's Preferred Alternative). The Local Redevelopment Authority (LRA), consisting of representatives from the Municipality of Norristown, Plymouth Township, Montgomery County, Montgomery County Planning Commission, Norristown Area School District, and Continuum of Care Homeless Program, recommended that the property be used as an elementary school/kindergarten center. No demolition on the site is planned; however, some facility improvements are planned.

The Army is not aware of any resident protected species at the Musselman USARC site. The U.S. Fish and Wildlife Service (USFWS) Northeast Regional website was accessed to determine if any Federally-listed species occur in the vicinity of the project location ([http://www.fws.gov/northeast/endangered/endangered\\_species\\_listing.html](http://www.fws.gov/northeast/endangered/endangered_species_listing.html)). The endangered Indian bat (*Myotis sodalis*) and threatened bog turtle



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BUREAU OF FORESTRY

April 14, 2011

**PNDI Number: 20110131280663**

**Amanda Murphy**  
Department of the Army  
99<sup>th</sup> Regional Support Command DPW  
Environmental Division  
5231 South Scott Plaza  
Fort Dix, NJ 08640

Re: Musselman USARC  
Plymouth Twp., Montgomery County

Dear Ms. Murphy,

Thank you for your submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number **20110131280663** for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources of concern under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

**No Impact Anticipated**

PNDI records indicate species or resources of concern are located in the vicinity of the project. However, based on the information you submitted concerning the nature of the project, the immediate location, and our detailed resource information, DCNR has determined that no impact is likely to occur to species of special concern under our jurisdiction as a result of this project.

This response represents the most up-to-date summary of the PNDI data files and is valid for one (1) year from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on-site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map).

This finding applies to impacts to DCNR only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure the U.S. Fish and Wildlife Service, PA Game Commission, and the Pennsylvania Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at [www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us).

Sincerely,

Rebecca H. Bowen, Environmental Review Manager FOR Chris Firestone, Wild Plant Program Mgr.  
Ph: 717-772-0258 ~ [c-rbowen@state.pa.us](mailto:c-rbowen@state.pa.us)

AGEISS Inc.  
1401Marvin Rd NE, Suite 307, #422  
Olympia, WA 98516

**RECORD OF CONVERSATION**

Separate Conversation with: Officer Raymond  
Bednarchik

Date: 19 May 2011

Time: 1100

Company/Agency: Pennsylvania Fish and Boat  
Commission  
Southeast Regional Office

Project No.: W91278-06-D-0018 Task order 0014C

DCC No.:

Address: Brubaker Valley Rd and Lakeview Dr.  
P.O. Box 9  
Elm, PA 17521  
Phone Number: (717)626-0228

Personnel Present: Wendy Arjo

**SUBJECT: PENNSYLVANIA FISH AND BOAT COMMISSION CONSULTATION**

**SUMMARY**

Dr. Arjo spoke Officer Raymond Bednarchik on 19 May 2011 following up on the biological consultation for the Musselman USARC reuse EA. Officer Bednarchik stated that the PA Fish and Boat Commission felt that there was no impact to waterways or species under their jurisdiction from the proposed action. The Commission has no comment or concerns on the proposed disposal and reuse of the Musselman USARC.

*Wendy M. Arjo*

**19 MAY 2011**

\_\_\_\_\_  
**DATE**

\_\_\_\_\_  
**DATE**

AGEISS Inc.  
1401Marvin Rd NE, Suite 307, #422  
Olympia, WA 98516

**RECORD OF CONVERSATION**

Separate Conversation with: Olivia Braun	Date: 7 June 2011
Company/Agency: Pennsylvania Game Commission	Time: 1136
Address: 2001 Elmerton Ave Harrisburg, PA 17110 Phone Number: (717)787-4250	Project No.: W91278-06-D-0018 Task order 0014C
Personnel Present: Wendy Arjo	DCC No.:

**SUBJECT: PENNSYLVANIA GAME COMMISSION CONSULTATION**

**SUMMARY**

Dr. Arjo spoke with Olivia Braun, Environmental Planner, on 7 June 2011 following up on the biological consultation for the Musselman USARC reuse EA. Ms. Braun stated that the PA Game Commission felt that there was no impact state listed species under their jurisdiction from the proposed action and that the PNDI Project review receipt submitted to the agency represented the confirmation of no impact. The Commission has no comment or concerns on the proposed disposal and reuse of the Musselman USARC.

*Wendy M. Arjo*

**7 JUNE 2011**

\_\_\_\_\_  
**DATE**

\_\_\_\_\_  
**DATE**



Commonwealth of Pennsylvania  
Pennsylvania Historical and Museum Commission  
**Bureau for Historic Preservation**  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120-0093  
[www.phmc.state.pa.us](http://www.phmc.state.pa.us)

June 3, 2011

Jeffrey M. Hrzic, Chief  
Environmental Division, Dept. of the Army  
Headquarters, 99<sup>th</sup> Regional Support Command  
5231 South Scott Plaza  
Fort Dix, NJ 08640-5000

TO EXPEDITE REVIEW USE  
BHP REFERENCE NUMBER

Re: ER 2011-1672-091-A  
DOD: BRAC Realignment and Closure of the ILT Ray S. Mussel US  
Army Reserve Center, Norristown, Montgomery County,  
Pennsylvania

Dear Mr. Hrzic:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999 and 2004. These regulations require consideration of the project's potential effect upon both historic and archaeological resources.

We concur with the findings of the agency that the following property is not eligible for the National Register of Historic Places. This property is not historically or architecturally significant and has suffered a loss of integrity.

ILT Ray S. Mussel US Army Reserve Center, Norristown,  
Montgomery County

Therefore, based on the available information, there are no National Register eligible or listed historic buildings, structures, districts, or objects in the area of this proposed project. We concur with the findings of the agency that no archaeological resources will be affected by this project.

Page 2  
J. Hrzic  
June 3, 2011

If you need further information in this matter please consult Susan Zacher at (717)  
783-9920.

Sincerely,



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Andrea L. MacDonald, Chief  
Division of Preservation Services

AM/smz

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**From:** hsmcpa [hsmcpa@hsmcpa.org]  
**Sent:** Tuesday, June 14, 2011 11:29 AM  
**To:** tonyab@ageiss.com  
**Subject:** RE: disposal and reuse of the Musselman Memorial U.S. Army Reserve Center

The Historical Society of Montgomery County does not wish to participate in the Section 106 consultation concerning the Musselman Memorial U.S. Army Reserve Center located in Norristown, Pa.

Karen M. Wolfe  
Executive Director  
HSMC  
610-272-0297  
[karenw@hsmcpa.org](mailto:karenw@hsmcpa.org)

-----Original Message-----

From: Jesse Bergevin [mailto:jbergevin@oneida-nation.org]  
Sent: Monday, July 25, 2011 12:49 PM  
To: Murphy, Amanda W Ms CTR 99TH RSC ARIM  
Subject: RE: EA for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial USARC, Norristown, PA (UNCLASSIFIED)

Dear Ms. Murphy,

Thank you for providing the Oneida Indian Nation with this additional cultural resources information concerning this proposed undertaking. Based on a review of this new information I have no further concerns and concur with the assessment that the likelihood of Native historic resources within the area of potential effect is very low.

The Nation requests notification in the case of the inadvertent discovery of human remains or if Native historic resources are identified during later project studies, planning or construction.

If you have any questions, please call me at (315) 829-8463.

Thank you,

Jesse Bergevin  
Historic Resources Specialist

-----Original Message-----

From: Murphy, Amanda W Ms CTR 99TH RSC ARIM  
[mailto:amanda.w.murphy@usar.army.mil]  
Sent: Tuesday, July 19, 2011 1:35 PM  
To: Jesse Bergevin  
Subject: RE: EA for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial USARC, Norristown, PA (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Dear Mr. Bergevin,

Thank you for your interest in the disposal and reuse of the 1LT. Ray S. Musselman Memorial U.S. Army Reserve Center (USARC) in Norristown, Pennsylvania. This letter responds to your email dated May 17, 2011 regarding your review of the cultural resources assessment for this property. I apologize for the delayed response.

The U.S. Department of Agriculture, Natural Resources Conservation Service website indicates that the property sits on what is classified as "Urban land, 0 to 8 percent slope". Therefore, a soil profile for the area has not been defined. The urban soils in this area tend to be between 10 to 98 inches to bedrock, but it is difficult to say what is between bedrock and the surface. The adjacent soils are Penn-Lansdell complex (8 to 15 percent slope) with a typical profile of:

0 to 10 inches: Channery silt loam  
10 to 22 inches: Channery silt loam  
22 to 28 inches: Very channery silt loam  
28 to 48 inches: Bedrock

This indicates that the neighboring soils are fairly stable and bedrock is pretty close to the surface. Archaeological potential is low because of the disturbance from the USARC construction and the fact that it would have been an erosional environment (i.e. the top of a ridge) and material is not likely to have been deeply buried.

Because of the low potential for archaeology at this site, with very little in the way of exposed surfaces that could be surveyed, a review of the regional/local reports was not performed as part of the literature review. As noted in the cultural resources assessment, the only remaining surfaces that are not paved include small strips of land adjacent to the roadway along the front of the USARC property that were likely affected by the construction of the site as heavy equipment passed over. Therefore, no archaeological investigations were conducted as part of this assessment. The Pennsylvania State Historic Preservation Officer concurred with the Army's determination that no archeological resources would be affected by the proposed action on June 3 (see attached).

Given the concerns you expressed in your email, a further review of the previously-recorded archaeological resources and past surveys in the area was initiated. The attached letter report describes this review and its results. In summary, the report finds that based on in-field visual inspection, the soils information, previous archaeological surveys in the region, the topographic setting, the depositional environment, prehistoric settlement and land-use patterns, and both past and on-going patterns of surface disturbance, the potential for intact archaeological deposits at the Musselman USARC is extremely low.

Please let me know if you have further questions or concerns.

Sincerely,

Amanda Murphy  
Program Coordinator  
NEPA and Cultural Resources  
99th RSC DPW Contractor  
Fort Dix, NJ  
Phone: 609-521-8047

-----Original Message-----

From: Jesse Bergevin [mailto:[jbergevin@oneida-nation.org](mailto:jbergevin@oneida-nation.org)]

Sent: Tuesday, May 17, 2011 3:02 PM

To: Murphy, Amanda W Ms CTR 99TH RSC ARIM

Subject: RE: EA for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial USARC, Norristown, PA (UNCLASSIFIED)

Ms. Murphy,

I have reviewed the copy of the cultural resource assessment (CRA) you provided the Oneida Indian Nation. I have some initial concerns I have identified from my review.

The archaeological assessment of the property is based on observations made while the ground surface was not visible. It appears from the photographs and report that the property was examined during a period of snow cover which would have impeded any visual inspection for disturbance. Although, disturbance is assumed from building plans, the landform does not seem to be significantly altered in relation to the surrounding area when examining aerial photographs of the project area.

I do not recall a review of the regional archaeological literature and past local surveys that may have provided insight into the archaeological potential of the property or seeing a discussion of the soil profile and evidence of past disturbance provided through an examination of the soil on site.

The State of Pennsylvania's Cultural Resources GIS portal was used to try to identify previously identified cultural resources within an area of potential effect that appears to have never been surveyed for archaeological resources. Not surprisingly, this research identified no historic resources.

I would like to be able to have these issues clarified before I am able to provide comment on this proposed action. Please feel free to call with any questions or if you have additional information to share regarding this.

Thank you,

Jesse Bergevin

Historic Resources Specialist

Telephone: (315) 829-8463

Facsimile: (315) 829-8473

E-mail: [jbergevin@oneida-nation.org](mailto:jbergevin@oneida-nation.org)

-----Original Message-----

From: Murphy, Amanda W Ms CTR 99TH RSC ARIM  
[mailto:amanda.w.murphy@usar.army.mil]

Sent: Tuesday, May 17, 2011 11:50 AM

To: Jesse Bergevin

Subject: RE: EA for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial USARC, Norristown, PA (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Dear Mr. Bergevin,

I am pleased to provide you a copy of the cultural resources assessment for the Musselman Memorial USARC in Norristown, PA. As the report indicates, there appears to be very little potential for the presence of intact cultural deposits on the Musselman USARC property. Please let me know if you have any questions or concerns within 30 days. Thank you very much!

Amanda Murphy  
Program Coordinator  
NEPA and Cultural Resources  
99th RSC DPW Contractor  
Fort Dix, NJ  
Phone: 609-521-8047

-----Original Message-----

From: Jesse Bergevin [mailto:jbergevin@oneida-nation.org]

Sent: Monday, April 11, 2011 2:09 PM

To: Murphy, Amanda W Ms CTR 99TH RSC ARIM

Subject: EA for the proposed action of closure, disposal, and reuse of the 1LT Ray S. Musselman Memorial USARC, Norristown, PA

I am reviewing the letter of 24 March 2011 sent to the Oneida Indian Nation concerning the Environmental Assessment for the proposed action of closure, disposal and reuse of the 1LT Ray S. Musselman United States Army Reserve Center in Norristown, Pennsylvania. Before I am able to provide comment I would like to be able to review the cultural resources survey of January 2011 that determined the area of potential effect for this proposed action has a low potential for historic resources.

Would a copy of this survey be available for review? As Native historic land used would have occurred long before the installation of those "impervious surfaces features" our concern is more about the extent of vertical disturbance in the naturally occurring soil profile. I am hoping that information would be available in this report.

Would you be able to email a copy of the report or send one on CD-ROM? I am hoping either of those formats would be faster and less costly to send. My mailing address is below in the signature line.

Please feel free to call with any questions or if you have additional

information to share regarding this.

Thank you,

Jesse Bergevin  
Historic Resources Specialist  
Oneida Indian Nation  
1256 Union Street  
P.O. Box 662  
Oneida, NY 13421-0662  
(315)829-8463  
[jbergevin@oneida-nation.org](mailto:jbergevin@oneida-nation.org)

# NORRISTOWN FIRE DEPARTMENT

## MUNICIPALITY OF NORRISTOWN

A HOME RULE MUNICIPALITY

EMERGENCY  
911

THOMAS M. O'DONNELL, C.F.O.  
FIRE CHIEF  
610-292-8281  
FAX 610-292-8090



NON-EMERGENCY  
610-275-0300

FIRE MARSHAL  
610-270-2894

235 EAST AIRY STREET  
NORRISTOWN, PENNSYLVANIA 19401-5048

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February 14, 2012

Anne Rohricht  
Norristown Area School District  
Chief Financial Officer  
401 North Whitehall Road  
Norristown, Pa. 19403

Re: 1Lt. Ray S. Musselman USAR Center 1020 Sandy Street, Norristown, Pa. 19401

Dear Anne,

This letter will confirm that the Norristown Fire Department a combination fire service provider who employees fulltime career firefighters 24 hours a day is more than capable of responding to any emergency at this facility upon request.

If you have any addition questions, please contact my office directly at (610) 292-8281.

Yours in the Fire Service,

A handwritten signature in black ink that reads "Thomas M. O'Donnell".

Thomas M. O'Donnell  
Fire Chief and Emergency Management Coordinator

**NORRISTOWN POLICE DEPARTMENT  
MUNICIPALITY OF NORRISTOWN**

RUSSELL J. BONO  
CHIEF OF POLICE  
610-270-0470  
FAX 610-272-5134  
FBINA 181

A HOME RULE MUNICIPALITY

235 EAST AIRY STREET  
NORRISTOWN, PENNSYLVANIA 19401-5003

CRIMINAL INVESTIGATION  
610-270-0481  
COMMUNICATION  
610-272-1111  
RECORDS INFORMATION  
610-270-0469

February 7, 2012

Anne Marie Rohricht  
Norristown Area School district  
Chief Financial Officer  
404 N. Whitehall Road  
Norristown, Pa. 19403

Ms. Rohricht;

I have reviewed the plan you have presented regarding the creation of an elementary school on the property currently known as the Musselman Army Reserve Center. This property is located at 1020 Sandy Street in the Municipality of Norristown. After careful reading of the plan, I conducted an analysis of the resources of the Norristown Police Department and the impact an additional elementary school might have. I am confident that this proposal would not present any difficulties to our department, and that we would be completely capable of providing any public safety needs or services required.

Please don't hesitate to contact me in the future if you have any questions or concerns regarding police services.

Sincerely,



Russell J. Bono  
Chief of Police

## **APPENDIX C. CULTURAL RESOURCES ASSESSMENT**

This appendix contains the cultural resources assessment performed as part of this environmental assessment.



**CULTURAL RESOURCES ASSESSMENT for  
BASE REALIGNMENT AND CLOSURE ACTIONS at the  
MUSSELMAN U.S. ARMY RESERVE CENTER (PA068)  
NORRISTOWN, PENNSYLVANIA**

Prepared for:  
The U.S. Army Corps of Engineers  
and the  
U.S. Army Reserve 99<sup>th</sup> Regional Support Command

Prepared by:  
Benjamin A. Roberts  
Historian

Under the direction of:

A handwritten signature in black ink, reading "F. Patricia Stallings". The signature is written in a cursive style with a large initial "F".

---

Patricia Stallings  
Senior Historian

April 2011  
Brockington and Associates, Inc.  
Norcross, Georgia

## EXECUTIVE SUMMARY

In January 2011, Brockington and Associates, Inc. completed a Cultural Resources Assessment of the 1LT Ray S. Musselman United States Army Reserve Center (Musselman USARC) in Norristown, Montgomery County, Pennsylvania for proposed Base Realignment and Closure (BRAC) actions. The work was conducted to fulfill requirements as outlined in Sections 106 and 110 of the National Historic Preservation Act of 1966, as amended.

In conducting the Cultural Resources Assessment, an Area of Potential Effect (APE) consistent with the proposed action was developed. The APE was limited the current legal boundary of the Musselman USARC and all real property. Prior to the field assessment, a thorough literature review to identify previously recorded archaeological sites and historic structures within, or adjacent to, the USARC property was conducted. There are no previously recorded archaeological sites or historic structures within, or adjacent to, the Musselman USARC property.

No systematic archaeological survey has been conducted at the Musselman USARC (USACE 2009: 8.112). The literature review revealed substantial ground disturbance through the construction of buildings and parking lots during the initial and subsequent construction phases on the site. Because of the extent and pattern of these disturbances, the potential for identifying intact cultural deposits is low. Therefore, no archaeological investigations were conducted as part of this assessment.

Two permanent buildings located on the Musselman USARC property were evaluated for historical significance. Although the two permanent buildings meet the 50-year age minimum, neither possesses significant integrity that would render them eligible for inclusion in the NRHP. Both permanent buildings possess historical associations with the United States Army's Reserve Program and the typical *Sprawling Plan* architectural subtype. Both buildings were subject to significant alterations in 1994 and their original architectural form is no longer intact. Based on a lack of architectural integrity and the lack of significant historical associations, the buildings at the Musselman USARC are not recommended eligible for inclusion in the NRHP.

## **1.0 INTRODUCTION and SCOPE OF WORK**

On January 19, 2011, Brockington and Associates, Inc. contracted with AGEISS Inc. to conduct a Cultural Resources Assessment of the 1LT Ray S. Musselman United States Army Reserve Center (Musselman USARC), which falls within the assigned command area of the United States Army (Army) Reserve 99<sup>th</sup> Regional Support Command (RSC). This assessment has been prepared for the U.S. Army Corps of Engineers (USACE) and the 99<sup>th</sup> RSC for proposed Base Realignment and Closure (BRAC) actions. Brockington conducted all contracted objectives of this task order to meet requirements as outlined in Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Section 106 of the NHPA requires Federal agencies to consider effects to historic properties prior to an undertaking. The undertaking in this case is the legal transfer of the Musselman USARC property to a non-federal entity (Norristown Area School District, Pennsylvania).

The purpose of this report is to provide information to the Army so that it can determine if historic properties will be affected by the proposed undertaking. In preparing this report, the appropriate cultural resources guidelines available from the Pennsylvania Bureau for Historic Preservation (PABHP) were reviewed and utilized. To meet this objective, work conducted for this project included:

1. Archival research to determine the presence of previously recorded cultural resources.
2. A site reconnaissance to ascertain if historic properties (i.e. those listed on or eligible for the National Register of Historic Places [NRHP]) are located within the Area of Potential Effect (APE), and if those properties may be adversely affected by plans to transfer the USARC; and
3. Preparation of a report summarizing the results and recommendations.

This letter report is organized as follows:

- 1.0 Introduction and Scope of Work
- 2.0 Literature Review
- 3.0 Site Description and Property History
- 4.0 Cultural Resources Reconnaissance and Evaluation
- 5.0 References

Appendix A: Maps

Appendix B: Photographs

## 2.0 LITERATURE REVIEW

Prior to and concurrent with the field assessment, a thorough literature review of materials related to the Musselman USARC was conducted. In conducting this work, an Area of Potential Effect (APE) consistent with the proposed action and disposal was developed. The APE was limited to the current legal boundary of the Musselman USARC and all real property. The literature review and associated research encompassed the APE.

The purpose of this research was to identify previously recorded archaeological sites and historic structures within, or adjacent to, the Musselman USARC property and to evaluate site types and landscapes in the vicinity to better understand the potential for cultural resources in the project area (Appendix A, Figures A-1 and A- 2).

Importantly, all relevant documentation provided by AGEISS Inc. and the Army was reviewed. This documentation included the following:

- February 2007, Final Environmental Conditions of Property (ECP) Report. [*Documents existing environmental condition of all transferable property for the Army's decision-making in the disposal process; provides the relevant information to the public and provides information on any necessary remedial and corrective actions*]
- September 2009, 99th RSC, Draft Integrated Cultural Resources Management Plan. [*Document provides a five-year implementation plan and guidance for the management of historic properties within the jurisdiction of the 99<sup>th</sup> RSC*]
- Various facility blueprints and 'as-built' architectural drawings
- July 2008, *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Moore et al. 2008). [*Context study developed for the Army Reserve providing NRHP evaluation and criteria guidelines pertaining to Reserve Centers as well as the national historic context in which they were constructed*]
- Description of Proposed Action and Alternatives (DOPAA). [*This document is essentially the first of three chapters of the Environmental Assessment being prepared by the Army for disposal and reuse of the Musselman USARC*]
- *Redevelopment Plan for 1LT Ray S. Musselman Memorial USARC* (Montgomery County Planning Commission as member of LRA). [*Developed by the LRA, this plan outlines the proposed use of the property*]

In addition to reviewing the materials listed above, a review of previously recorded properties and NRHP listings surrounding the Musselman USARC property was conducted. A review of the State of Pennsylvania's Cultural Resources GIS Portal was conducted to identify historic properties with state and local significance within the APE. There are no previously recorded historic resources within the APE. Historic maps, aerial

photography, and topographic quadrangles were also reviewed as part of the background research. These materials were available in the 2007 ECP Report with project overlays (USACE-Louisville 2007). Copies of selected maps, aerials, and quadrangles with project overlays are provided in Appendix A, Figures 3-15.

### **3.0. SITE DESCRIPTION and PROPERTY HISTORY**

#### **3.1 Site Description**

The Musselman USARC, named after First Lieutenant Ray S. Musselman, is located at 1020 Sandy Hill Road (Sandy Street) in the town of Norristown, Montgomery County, Pennsylvania. Zoning information was unavailable, but the area appears to be a mix of “commercial” and “residential” zoning with residential properties surrounding the property on the south and east and commercial establishments serving the local area located to the west and north. The Musselman USARC property is bounded by Sandy Hill Road to the north and consists of approximately 3.45 acres of land with two permanent structures, an unknown number of military vehicles, small containerized shipping trailers (connexes), and three paved parking lots (Figure A-2).

Approximately three-quarters of the 3.45 acre property is covered by impervious surface features, including asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining land is grassed with trees along the eastern and southern portions of the Musselman USARC property. The standing structures are described in further detail in Section 4.0. Figure A-2 provides a site map of the property.

#### **3.2 Property History**

Historic maps and aerial photographs dating as early as 1895 show the Musselman USARC property as undeveloped land prior to Federal ownership. Those maps, located in Appendix A, show no pre-military structures present on the property. The first recorded owner of the parcel on which the Musselman USARC is now located was Mary Newbold Cooke in 1920. Mary Newbold Cooke’s daughter, Ellen Newbold Jacobs, inherited the property in 1926. Ellen Jacobs then sold the property to William A. Steinbach in two parts in 1954 and 1955. The *Declaration of Taking* of the 3.45 acre parcel between William A. Steinbach and the Federal Government took place on September 27, 1955. The literature review, including historic maps and aerial photography, suggests that the entire 3.45-acre parcel was undeveloped agricultural land before 1955. The following detailed property history was extracted from the ECP Report (USACE-Louisville 2007: 2.3; 3.1-3.2).

The Musselman USARC property has primarily functioned as an administrative, logistical, and educational facility, with limited maintenance of military vehicles occurring in the OMS building. The property was historically used by reservists for drill activities on various weekends throughout the year. The 358th Civil Affairs Brigade is the current resident unit using the Musselman USARC. Activities inside the OMS building were limited to preventative maintenance checks and light maintenance activities. Any equipment requiring heavier maintenance was sent to the Area Maintenance Support Activity (AMSA) shop located at the Willow Grove Naval Air Station/Joint Reserve Base (NAS/JRB).

Based on the 1942 aerial photograph (Appendix A, Figure 9), the property and surrounding land were open fields or were used for agricultural purposes. It appears as though a house and a barn were located on the lot directly west of the property. The house and barn are no longer extant.

The USAR Center first appears in the 1958 aerial photograph (Appendix A, Figure 10). In this image, the main building is present, but the OMS building is not. The current location of the personally owned vehicle (POV) lot, on the northeast side of the property, appears to be a different color than the military equipment parking (MEP) lot south of the main building. This may indicate that the POV lot was not paved in 1958. In addition, residential neighborhoods appear to the north and east. West of the property, the house noted in the 1942 aerial photograph is no longer present, and a commercial building is in its place.

In the 1965 through 1992 aerial photographs (Appendix A, Figures 11 through 14), both the main and OMS buildings are present on the property. The surrounding properties appear unchanged with the exception of more commercial buildings west of the property. In 1973, a residential neighborhood appears directly south of the property, and several vehicles appear in the MEP lot. Figure 15 in Appendix A shows a recent aerial image produced in ArcGIS. This image shows the property in its current configuration; note that the POV parking lot appears to be paved.

In addition to historical aerial photographs, historical USGS topographical maps from 1895, 1952, 1966, 1973, and 1992 (Appendix A, Figures 3-8) were reviewed. A review of these maps indicates the same progression of development of the property and surrounding areas as the historical aerial photographs. The property appears undeveloped in the 1952 topographic map (Appendix A, Figure 4). The property first appears in the 1966 map (Appendix A, Figure 5) and is referred to as "Armory." The 1973 topographic map (Appendix A, Figure 6) shows additional residential streets south of the property.

## **4.0 CULTURAL RESOURCES RECONNAISSANCE and EVALUATION**

### **4.1 Site Visit**

During the morning of January 28, 2011, a pedestrian reconnaissance of the Musselman USARC property was conducted. The pedestrian reconnaissance included an inspection of the ground cover where available, landforms, exposed surfaces, as well as all standing structures. Because the proposed undertaking includes the transfer the property to a non-Federal entity, the APE was limited to the current legal property boundary for both archaeology and historic architecture. Figures B-2 through B-52 provides photographs of the Musselman USARC property and standing structures.

### **4.2 Archaeology**

There has been no systematic archaeological inventory undertaken for 99th RSC facilities in Pennsylvania. Rather, cultural resources investigations have mainly focused on new construction, expansion, or disposal actions (USACE 2009: 8.107). Therefore, as part of the archival research, historic maps, topographic quadrangles, aerial photographs, and architectural drawings were reviewed to identify previous land uses and disturbances. A review of these materials suggests the current 3.45-acre Musselman USARC property has been subjected to a substantial amount of ground disturbance since the late 1950s. As documented in Section 2.0, there are no previously recorded archaeological resources within the immediate property area of the Musselman USARC.

As evidenced during the reconnaissance and the literature review, there appears to be very little potential for the presence of intact cultural deposits on the Musselman USARC property. Additionally, as shown in Figure A-2, approximately three-quarters of the current property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. Considerable ground disturbance likely occurred during construction of buildings and parking lots on the site. The only remaining surfaces that are not paved include small strips of land adjacent to the roadway along the front of the USARC property and were likely affected by the construction of the site as heavy equipment passed over. Therefore, no archaeological investigations were conducted as part of this assessment.

### **4.3 Historic Architecture**

#### **4.3.1 Overview**

In September 1957, the Federal Government purchased the land that the Musselman USARC would be constructed on from William A. Steinbach. There are no existing structures or components from its pre-government owned period existing on the Musselman USARC property. There is no indication in the archival or historic image record that any buildings or structures existed on the site prior to Federal acquisition. The only permanent buildings existing on the Musselman USARC property include the main building and the OMS. Both were constructed in 1959 and are listed in the table below. Property photographs are provided in Appendix B.

<b>Permanent Buildings</b>	<b>Date of Construction/Alteration</b>	<b>Dimensions, feet</b>	<b>NRHP Recommendation</b>
Main Building	1959/1994	184 x 152	Not Eligible
OMS	1959/1994	65 x 40	Not Eligible
<b>Temporary Structures</b>			
Small Connexes	Unknown	5 x 15	Not Eligible

#### **4.3.2 U.S. Army Reserve Building Typology – Sprawling Plan Subtype**

In 2008, the Department of Defense Legacy Resource Management Program sponsored the development of *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Moore et al. 2008). This study identified historical trends, events, and individuals that influenced the design of Army Reserve Centers constructed during the Cold War. The document also provides criteria for evaluating Army Reserve Centers for inclusion in the NRHP (see Section 4.3.4 below). The *Sprawling Plan* subtype of Army Reserve Centers constructed during the Cold War is explained in *Blueprints for the Citizen Soldier*:

“The next generation of standard plans developed for and implemented by the Army Reserves featured a more sprawling, asymmetrical T- or L-shaped footprint and an “expansible” design. Reisner and Urbahn first designed this new architectural form, called the Sprawling Plan for this study, in 1952. However, the firm updated the plan in 1953. This new set of plans included variations for 400-, 600-, 800-, and 1,000-man Army Reserve Centers, all of which were expansible to accommodate more men if needed. In 1956, Urbahn, Brayton, and Burrows (the successor firm to Reisner and Urbahn) revised plans for this architectural form yet again. The 1956 version also included variations for much smaller Army Reserve Centers, including One-Unit (200-man) and One-Half-Unit (100-man) versions.

Although these various forms, which were developed in 1952, 1953, and 1956, exhibit subtle differences that distinguish them from one another, they still retain the same basic and fundamental concepts of design, and are distinctive from Army Reserve Center built before and afterward. For example, the character-defining features that separate the Sprawling Plan subtype from the earlier Compact Plan subtype include the asymmetrical building footprint and the “expansible” nature of the design. This plan was deliberately designed to respond to the specific functional needs of an Army Reserve Center by separating the assembly space from areas where arms and technological equipment was stored” (Moore et al. 2008: 169).

Chapter 3 of *Blueprints for the Citizen Soldier* also notes that constructing the original classroom block first allowed the Army a lower up-front cost and to use the facility for smaller units. As membership in the Army Reserve grew, the ability to add on to the

existing structure to accommodate larger units could be accomplished affordably and efficiently since the extensions were already designed (Moore et al. 2008: 156).

### **4.3.3 Musselman USARC: Architectural Description**

The footprint of the main building at Musselman USARC as built in 1959 resembles the *Sprawling Plan* subtype of Army Reserve Centers constructed during the Cold War. The main building at Musselman USARC is an irregular T-shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor, or 'hyphen'. The building consists of load-bearing concrete masonry unit walls, faced with brick and stucco on the exterior. The lower level of the façade has brick facing, while the second level, side and rear elevations are faced with stucco. The entry is set asymmetrical to the façade, and is located toward the eastern portion of the north elevation. The entry consists of a series of full height fixed pane windows and a pair of metal framed glass doors, all of which represent a 1991 modification to the building's original design. The modifications also included the replacement of the original aluminum framed windows with modern windows, with single fixed pane. The windows do, however, appear to retain the original concrete sills.

The building's interior consists of office space, classrooms, a kitchen area, storage, a former indoor firing range (removed and converted to office space in 1994), and an assembly area commonly referred to as the drill hall. An arms vault, used to store small arms including rifles and pistols, is located on the first floor. The remaining rooms of the first floor consist of administrative offices, storage, a former firing range, and a computer server room. The second floor runs the entire length of the northern half of the main building and consists of office space, classrooms, and a conference room. The upper portion of the lobby overlooks the foyer of the main entrance.

A boiler room is located on the southern portion of the main building and is lower in elevation than the rest of first floor and houses the building's water heater, natural gas heating units, and bypass feeder. Another room is located south of the boiler room on the first floor and is connected by a single doorway. The room is not currently in active use by Army Reserve personnel and was originally used as storage for the property's coal-fired heating system and associated coal fuel. A steel coal chute measuring approximately three feet by two feet square is located along the southern wall of the room. The Musselman USARC property switched to natural gas heating at an unknown date, and the coal heating system was decommissioned at that time.

The drill hall is located on the southern end of the main building, and consists of a flat, built-up roof, sloping away slightly from a discrete center ridge for drainage. The south wall of the drill hall contains a roll-type door for vehicle access and a personnel door and single fixed pane windows appear on the eastern and western clerestories. The floor area of the drill hall has a thick concrete floor to support heavy military vehicles and equipment and doubles as a recreation space. Locked storage cages are located east of the drill hall in an enclosed, one-story addition completed in 1994.

Several architectural alterations were made to the exterior of the main building in the early 1990s. The facility's windows and doors were replaced with modern materials. In addition, four windows along the façade (right of the main entry) were enclosed with brick. This is evidenced by a gap in the window fenestration along the façade of the building (see Figure B-8). A one story addition was also constructed on the north end of the building, which added additional office space and a common room. This addition was constructed of load bearing concrete block masonry units, faced with brick and metal coping at the roofline. The façade of this addition projects outward from the plane of the main building. Other alterations from the 1994 modifications include an enclosed 6,264-square-foot one-story storage area addition running the entire length of the east wall of the drill hall. In addition, the stucco facing on the building does not appear to be original to the design, although no drawings were located to verify this. One indication is to compare the coping on the drill hall brick exterior with the main building's coping where it joins the stucco. Areas in which the stucco was used is flush with the coping, suggesting that the veneer was incorporated at a later date. While stucco was a material used for Army Reserve Centers during this time, it was typically used as the primary material rather than a secondary, contrasting material.

The OMS building, located to the south of the drill hall section of the main building, is a 3,850-square-foot, two-bay brick vehicle garage with a flat, built-up roof, sloping away slightly from a discrete center ridge for drainage that slightly overhangs the two metal roll-up-type doors. The interior of the OMS is separated into four vehicle maintenance bays with rows of tool chests and caged storage areas. On the northeastern side of the OMS are two offices, a restroom, an electrical closet, and a communications (COMMO) storage room that stores communication equipment. Alterations to the OMS include the enclosure of one of the bays at an unknown date. This enclosure likely allowed for the creation of the interior offices.

The only other structures on the Musselman USARC property are several small containerized shipping containers known as connexes. These are mainly located along the southern and western edges of the rear parking lot of the Musselman USARC property. These structures are small and mobile, and are only used for temporary storage.

#### **4.3.4 NRHP Evaluation of the Musselman USARC**

Chapter 4 of *Blueprints for the Citizen Soldier* (Moore et al. 2008) study provides a framework for evaluating the relative significance of Army Reserve Centers from a national perspective and provides the basis for assessing the eligibility of Army Reserve Centers for inclusion in the NRHP. According to Moore:

As stated in National Register Bulletin No. 15, 'Integrity is based on significance: why, where, and when a property is important.' The character-defining physical features that made up the resource's appearance during its historic period of

significance must be recognizable for it to retain sufficient integrity to be eligible for the NRHP. Since Sprawling Plan Army Reserve Centers are part of a nationwide building program and are common throughout the United States, an extant example must retain ALL of the following character-defining features to be eligible for inclusion in the NRHP.

Army Reserve Centers that fall under the Sprawling Plan subtype may be eligible for listing in the NRHP under Criterion A in the area of military history for their associations with President Eisenhower’s “New Look” Program and the National Defense Facilities Act of 1950 (PL 783, 81st Congress). As analyzed in the discussion for the Compact Plan subtypes, these historical factors played important role in the history and development of the building program associated with the Army Reserves during the early and middle 1950s and extant examples of the Sprawling Plan subtype may be significant within that context. Although individual Army Reserve Centers may be eligible for the NRHP under Criterion B for their association with significant individuals, those associations would be applicable at a local level and would have to be researched and documented on an individual, center-by-center basis. At the national level, however, no significant associations under Criterion B have surfaced. Sprawling Plan Army Reserve Centers may also be eligible for inclusion in the NRHP under Criterion C in the area of architecture for their physical attributes and the quality of their design. Architecturally, they are associated with the influence of the Modern Style, which enjoyed widespread popularity among architects in the design of federal buildings in the 1950s. The type also is significant under Criterion C because the expansible and flexible nature of the plans documents the military’s vision for a changing Army Reserve Force and increasingly important role that the Reserves filled in the nation’s defense and military preparedness (Moore et al. 2008: 173).

The following table shows the character defining architectural features must be in place to consider the Musselman USARC eligible for the NRHP for its association with the Sprawling Plan subcategory of USARC construction under Criteria A, B, or C. These character defining features were developed in *Blueprints for the Citizen Soldier* (Moore et al. 2008)

<b>ALL CHARACTER DEFINING FEATURES MUST BE INTACT FOR NRHP ELIGIBILITY*</b>	
<b>CHARACTER DEFINING FEATURE</b>	<b>INTACT AT Musselman USARC?</b>
Follows 1952, 1953, or 1956 standard plan	Yes
Retains original “sprawling” footprint with asymmetrical T- or L-plan	No
Additions follow “expansible” design on original standard plan	No
Original flat roof form over classrooms	Yes
Original low-pitched roof form over assembly wing at rear	Yes
Original fenestration pattern intact	No
Front entrance with original metal door/sidelight/transom assembly	No
Cantilevered canopy, if original	N/A

Original “masonry units,” brick veneer, or historically appropriate stucco veneer on exterior walls	No
Original doors and windows or compatible replacement doors and windows that meet the <i>Secretary of Interior’s Standards for Rehabilitation</i>	No
Clerestory windows in assembly wing	Yes <sup>1</sup>
Original configuration of interior corridor and lobby space	Yes
Presence of flexible accordion partitions, if original, or opening in wall where accordion partition was originally located	Unknown
Double-height open interior space in assembly wing at rear	Yes
Overhead rolling door at assembly wing	Yes
Historic-age maintenance shop, if original	Yes <sup>2</sup>
Integrity of setting intact	Yes
<b>DETERMINATION OF NRHP ELIGIBILITY</b>	<b>NOT ELIGIBLE</b>

\* Adapted from Moore et al. 2008: 179

<sup>1</sup> Windows present but replaced with modern materials

<sup>2</sup> Enclosure of one bay, circa 1994

Only two permanent buildings located on the Musselman USARC property meet the basic age criteria, 50 years, to be considered for inclusion in the NRHP. These include the main building and the OMS.

With the additions and alterations to the main building in 1994, the character defining features that would make the structure eligible for the NRHP under the criteria for the *Sprawling Plan* subtype are no longer present. The replacement of the windows and doors and the enclosure of windows significantly changed main building’s façade and fenestration pattern causing it to lose any historic integrity it once had. Furthermore, the construction of a one-story addition on the north elevation of the main building and the large addition to the north end of the drill hall altered the original T-shaped footprint of the building, a key feature of the *Sprawling Plan* subtype of U.S. Army Reserve Center design. Because it lacks historic architectural integrity, the main building is not eligible for inclusion in the NRHP.

Although the age of the OMS qualifies it for inclusion in the NRHP under the minimum age requirement, the building lacks integrity because of the alterations that occurred during the early 1990s. Further, the 2008 Historic Context Study states, “Resources within this property type [support building] are not likely to be eligible for the NRHP on an individual basis because they lack historical and/or architectural significance to meet any National Register Criteria. If the associated Reserve Center lacks significance or integrity to be eligible for the NRHP, support buildings and structures likewise are not eligible for the NRHP” (Moore et al. 2008: 193). Because the main building at the Musselman USARC is not eligible, neither are the support buildings inclusive of the OMS Building.

Archival research did not identify any additional significant national, state, or local associations with the main building, the OMS, or any other structure located on the 1LT Ray S. Musselman USARC property. The Musselman USARC does not possess military

significance at the state or local level under Criterion A. It was established as part of a national federally-funded program that resulted in the construction of individual reserve centers in communities throughout the country. The Musselman USARC is one of at least 34 Reisner and Urbahn Army Reserve Centers in Pennsylvania constructed between 1952 and 1964, and the Sprawling Plan is the most common design constructed in the state during the 1950s and 1960s. In addition, unlike the National Guard, the Army Reserve does not have a local or state mission. Reservists respond only in times of international crisis. Additionally, the Musselman USARC was built to accommodate 400 Reservists at a time and the Historic Context Study (Moore et al. 2008) mentions that USARC locations were chosen mainly for proximity to major transportation corridors for easy access by Reservists. The USARC would have employed existing Reservists in the area and most of the activity would have been limited to the weekends. For these reasons, the USARC would not have contributed significantly to economic growth or planned community development of the Norristown area. Under Criterion B, a USARC must be associated with an individual that was instrumental in the Army Reserve within that state (Moore et al. 2008). Merely naming a USARC after a significant individual does not render it NRHP eligible. As in the case of the Musselman USARC, many USAR facilities are named after local fallen heroes. Ray Musselman, who was awarded both a Silver Star and Purple Heart, was killed in action on 3 March 1945.

Based on its lack of architectural integrity and the lack of significant historical associations, the buildings and structures at the Musselman US Army Reserve Center are not eligible for inclusion in the NRHP.

## 5.0 REFERENCES

Department of Defense

2006 Department of Defense's Base Redevelopment and Realignment Manual, DoD 4146.77-M (BRRM)

Google Earth

2011 Internet Online; accessed: February, 2011;  
<http://www.google.com/earth/index.html>

Montgomery County Planning Commission

2010 *Redevelopment Plan for 1LT Ray S. Musselman Memorial U.S. Army Reserve Center (USARC)*. Prepared by the Montgomery County Planning Commission as a member of the Local Redevelopment Authority (LRA) for the Department of Defense.

Moore, David W., Jr., Justin B. Edgington, and Emily T. Payne

2008 *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers*. HHM, Inc., Austin, TX; prepared for Legacy Resource Management Program, U.S. Department of Defense

Penn Pilot

2011 *Historic Aerial Photographs of PA*. <http://www.pennpilot.psu.edu/>

Sherfy, Marcella and W. Ray Luce

n.d. *National Register Bulletin 22: Guidelines for Evaluating and Nominating Properties That Have Achieved Significance in the Last Fifty Years*. US Department of the Interior, Park Service, Interagency Resources Division, Washington, DC.

State of Pennsylvania

2011 *State of Pennsylvania Online Cultural Resources GIS Portal*. Online Resource:  
<http://www.portal.state.pa.us>

U.S. Army Corps of Engineers, Baltimore District

2009 *Draft U.S. Army Reserve 99<sup>th</sup> Regional Support Command Integrated Cultural Resources Management Plan, 2009-2014*.

U.S. Army Corps of Engineers, Louisville District

2007 *Environmental Condition of Property Report of the 1LT Ray S. Musselman U.S. Army Reserve Center (PA068)*. Prepared by CH2M Hill for the U.S. Army Corps of Engineers, Louisville District.

U.S. Army

2007 *AR 200-1 Environmental Protection and Enhancement*. U.S. Army Regulation

**APPENDIX A**  
**MAPS**

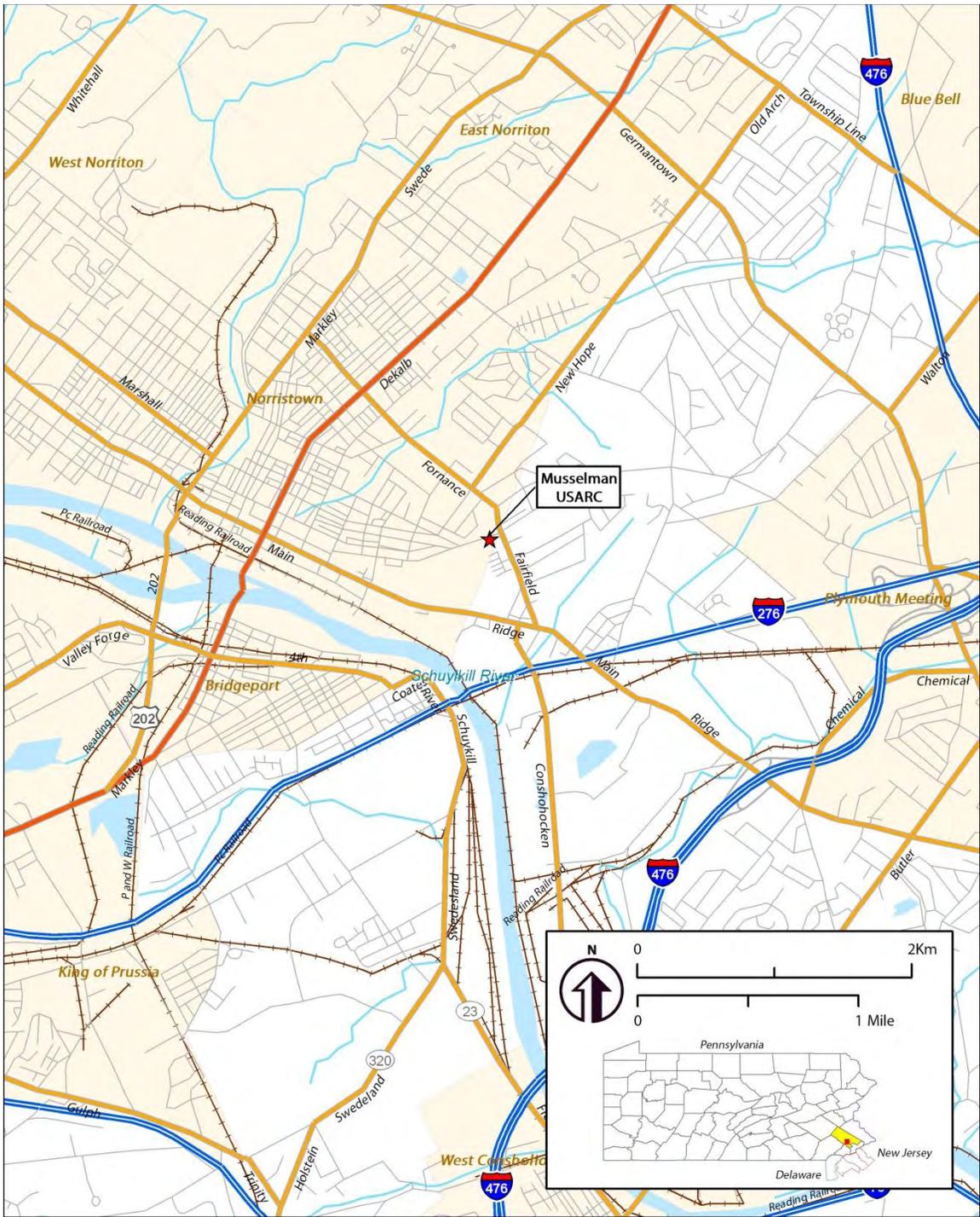


Figure A-1. Musselman USARC location map.

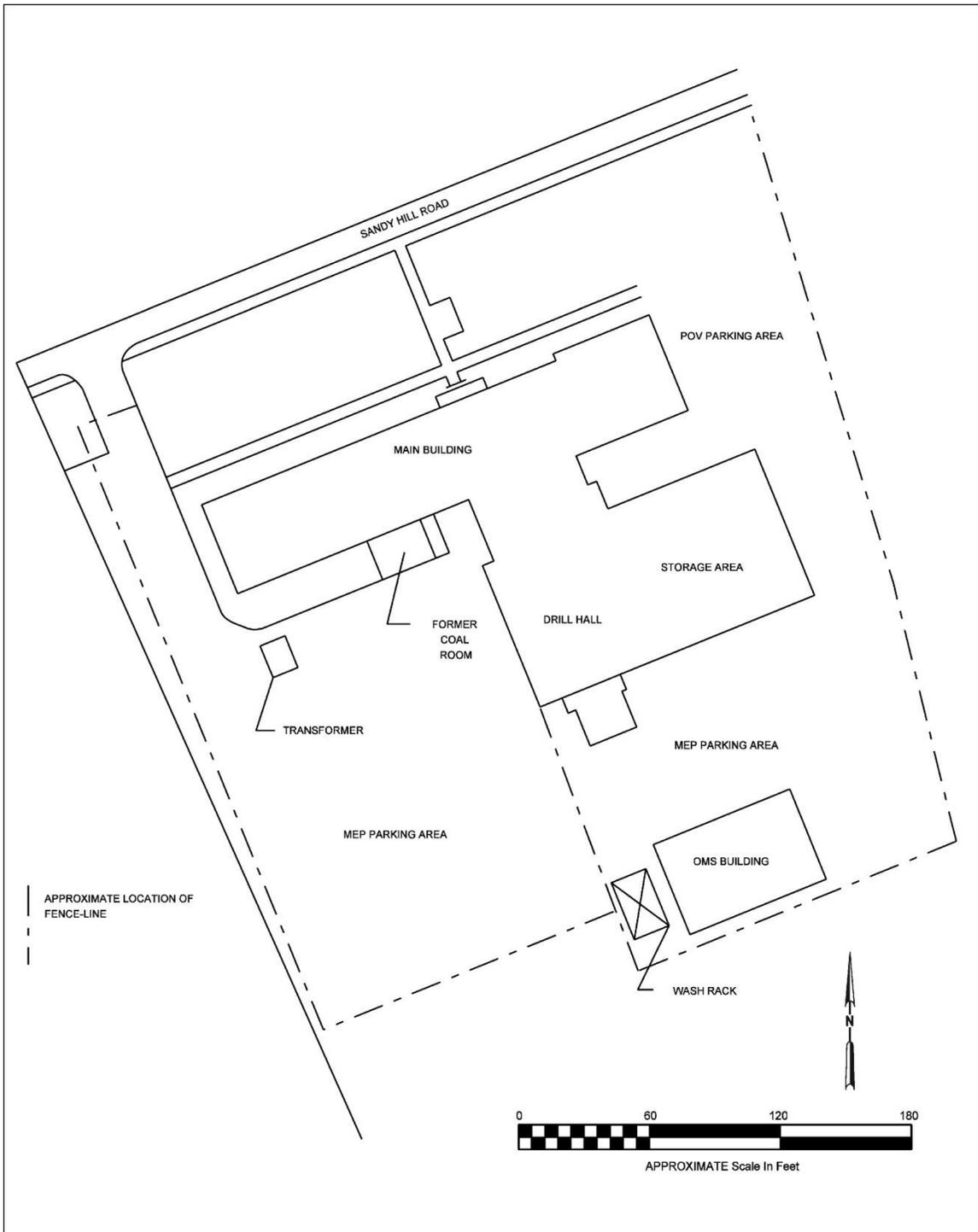


Figure A-2. Musselman USARC property site map (from ECP [USACE-Louisville 2007]).

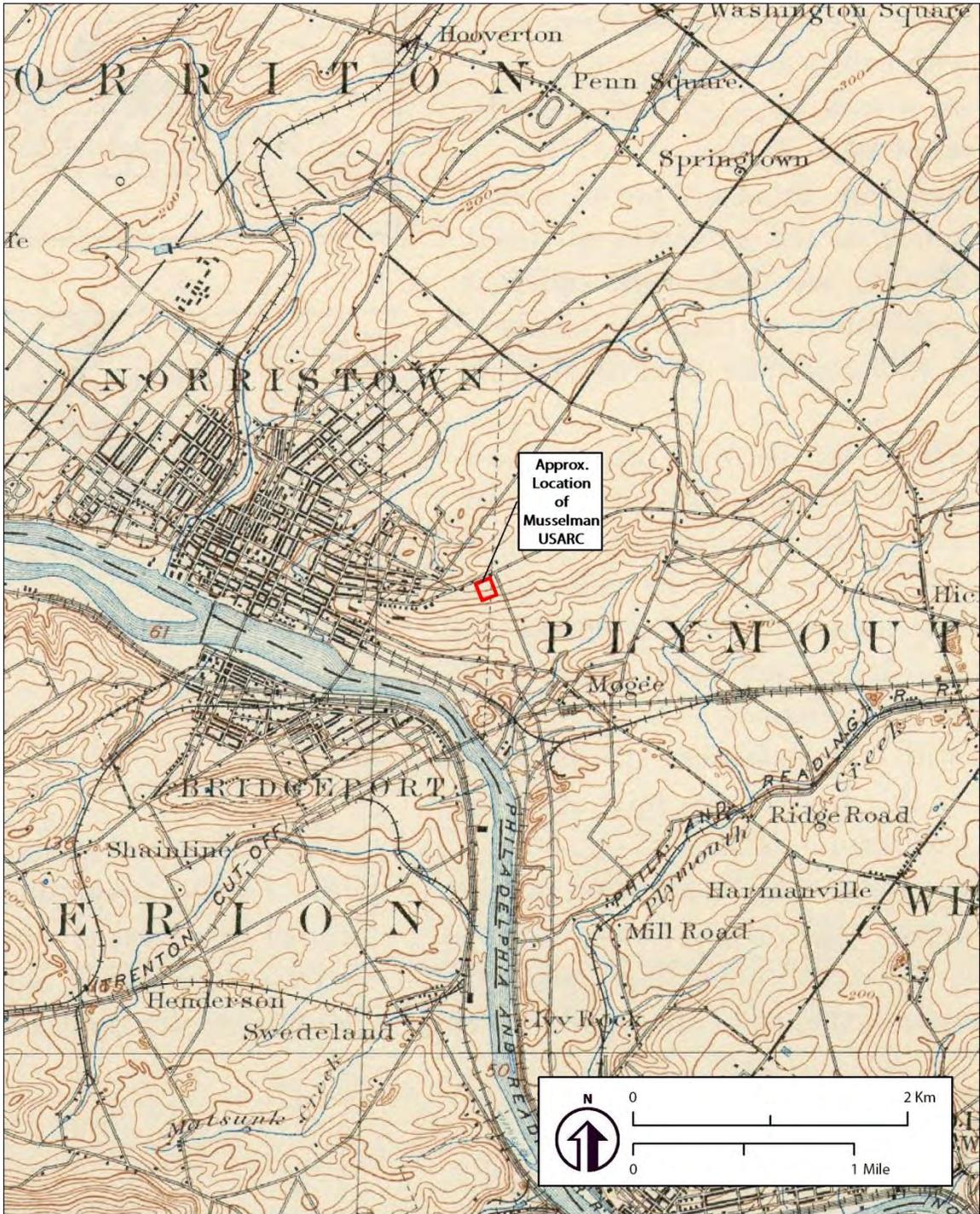
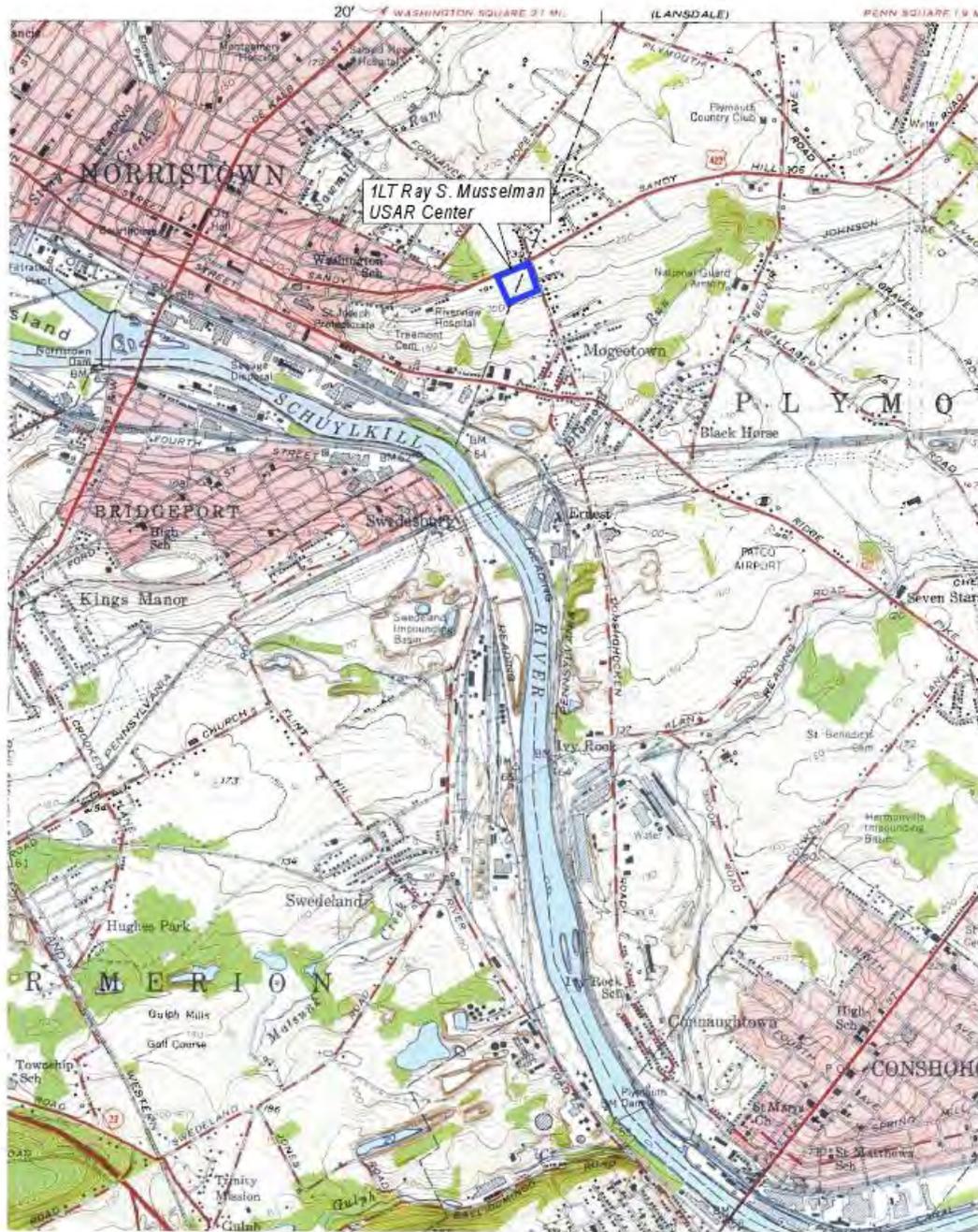


Figure A-3. Location of Musselman USARC overlay on 1895 Norristown 15 minute series USGS Topographic Quadrangle (modified from Penn Pilot: 2011 in ArcGIS).



N ^ EDR INQUIRY# 1714247.214 TARGET QUAD: NORRISTOWN YEAR: 1952 Series: 7.5' Scale: 1:24,000

**FIGURE 11**  
 1952 USGS 7.5-minute  
 Topographic Map  
 Phase I ECP Report

**CH2MHILL**

ES002006013MKE - Musselman Figure 10 1952 USGS 7.5-minute Topographic Map

**Figure A-4. Location of Musselman USARC overlay on 1952 USGS topographic map (From ECP Report [USACE-Louisville 2007: Appendix A]).**



N^ EDR INQUIRY# 1714247.214 TARGET QUAD: NORRISTOWN YEAR: 1966 Series: 7.5' Scale: 1:24,000

**FIGURE 12**  
1966 USGS 7.5-minute  
Topographic Map  
Phase I ECP Report

**CH2MHILL**

ES0#2006013MKE - Musselman Figure 12 1966 USGS 7.5-minute Topographic Map

**Figure A-5. Location of Musselman USARC overlay on 1966 USGS topographic map [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**



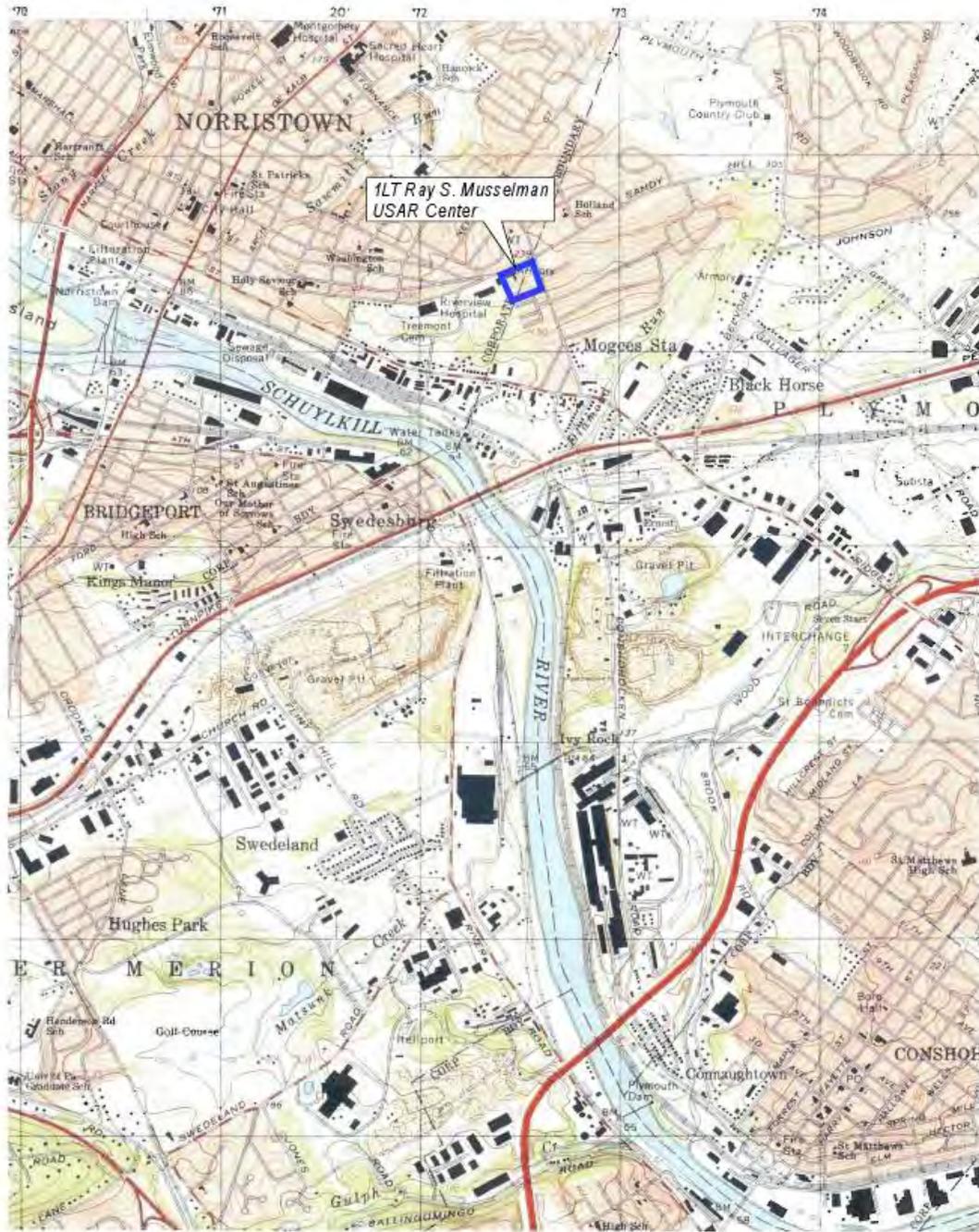
N<sup>A</sup> EDR INQUIRY# 1714247.214 TARGET QUAD: NORRISTOWN PhotoRevised: 1966-1973 Series: 7.5' Scale: 1:24,000

**FIGURE 13**  
1973 USGS 7.5-minute  
Topographic Map  
Phase I ECP Report

**CH2MHILL**

ES002006013MKE - Musselman Figure 14 1973 USGS 7.5-minute Topographic Map

**Figure A-6. Location of Musselman USARC overlay on 1973 USGS topographic map [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**



N ^ EDR INQUIRY# 1714247.214 TARGET QUAD: NORRISTOWN YEAR: 1992 Series: 7.5' Scale: 1:24,000

**FIGURE 3**  
1992 USGS 7.5-Minute  
Topographic Map  
Phase I ECP Report

**CH2MHILL**

ES082006013MKE - Musselman Figure 3 1992 USGS 7.5-Minute Topographic Map

**Figure A-7. Location of Musselman USARC overlay on 1992 USGS topographic map [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**

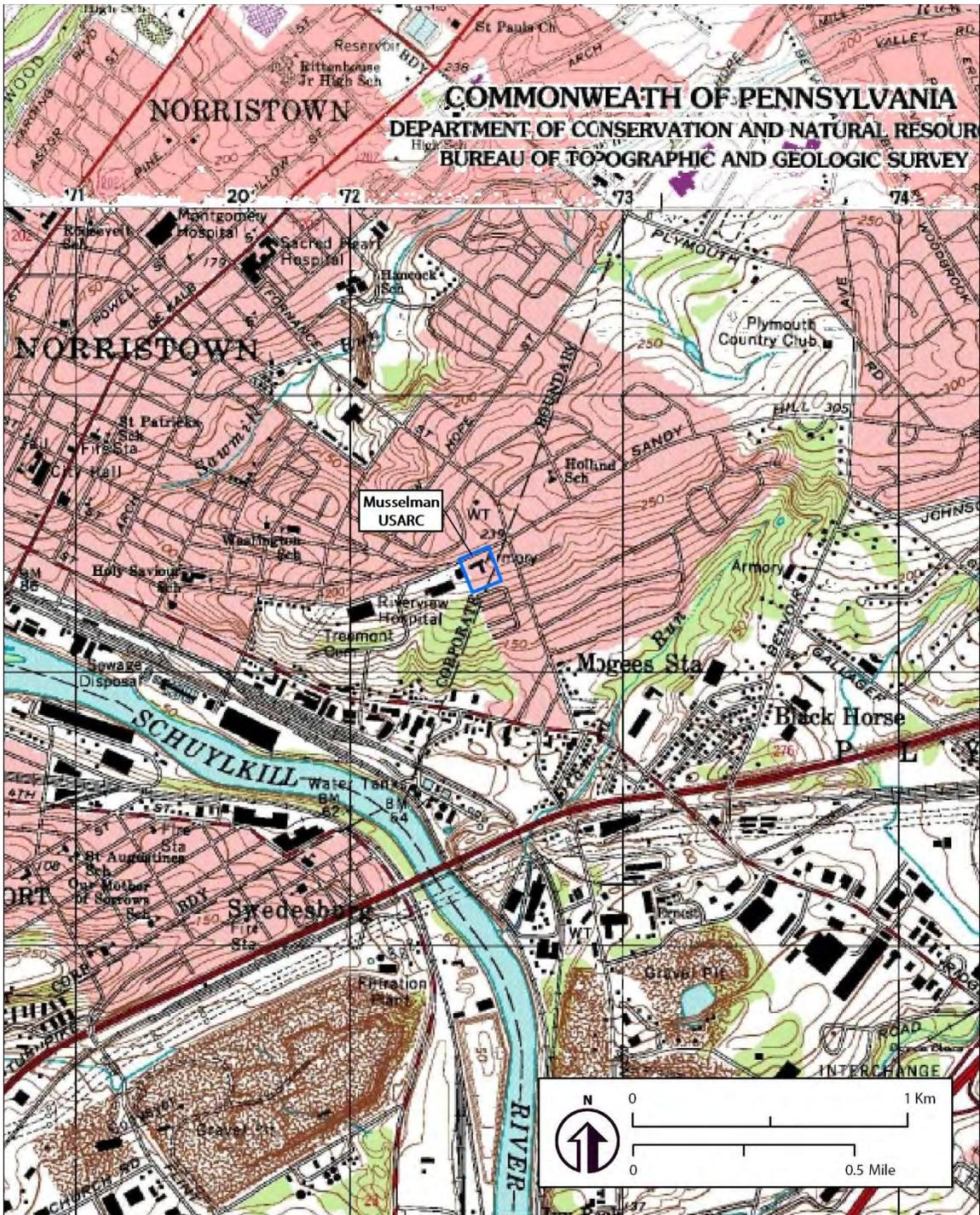
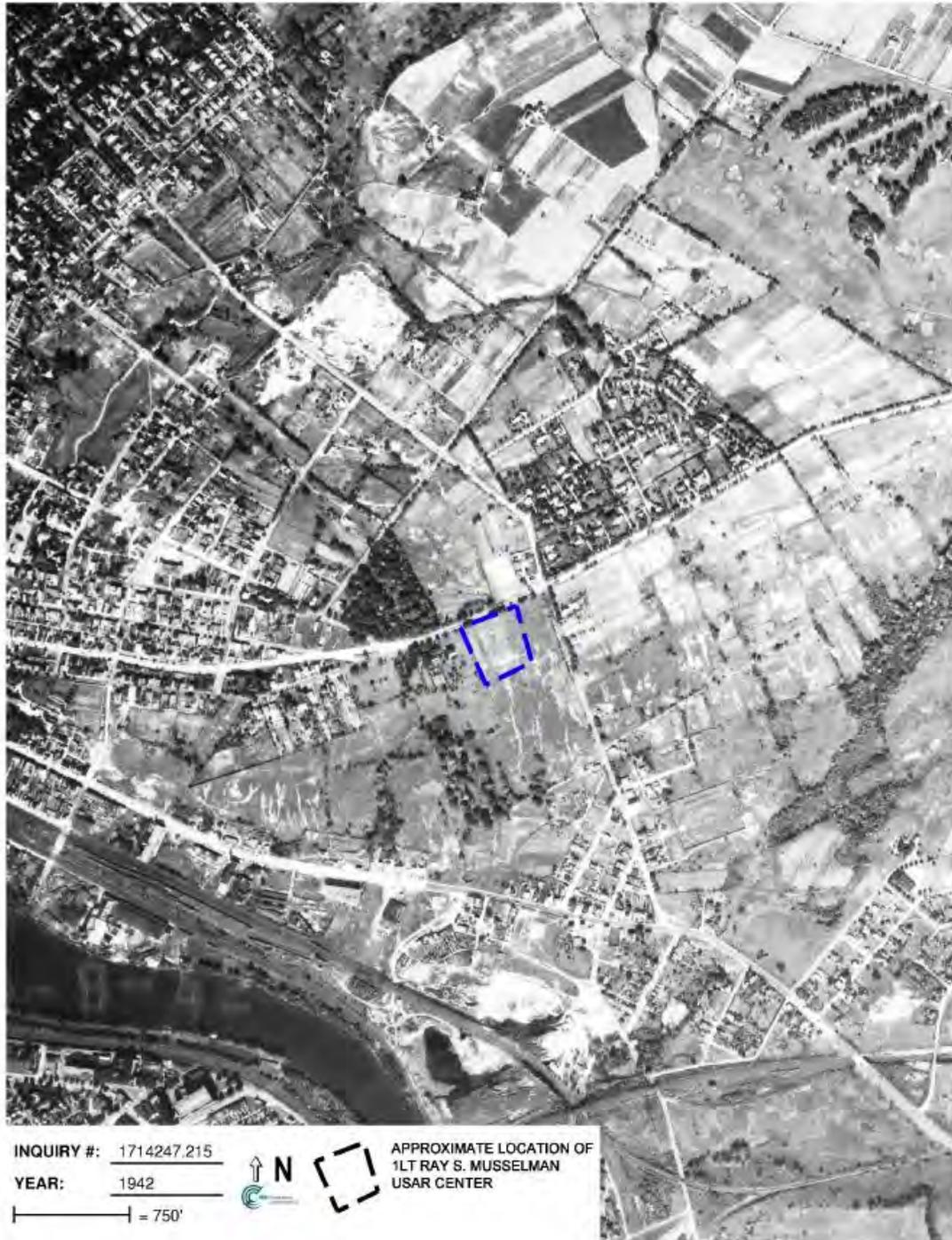


Figure A-8. Location of Musselman USARC overlay on 1992 Norristown, PA & 1966 Lansdale, PA 7.5 minute series USGS Topographic Quadrangles (USGS in ArcGIS).



**FIGURE 4**  
 1942 Aerial Photograph  
 Phase I ECP Report

**CH2MHILL**

ES0#2006013MKE - Musselman Figure 4 1942 Aerial Photograph

**Figure A-9. Location of Musselman USARC overlay on 1942 aerial photograph [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**

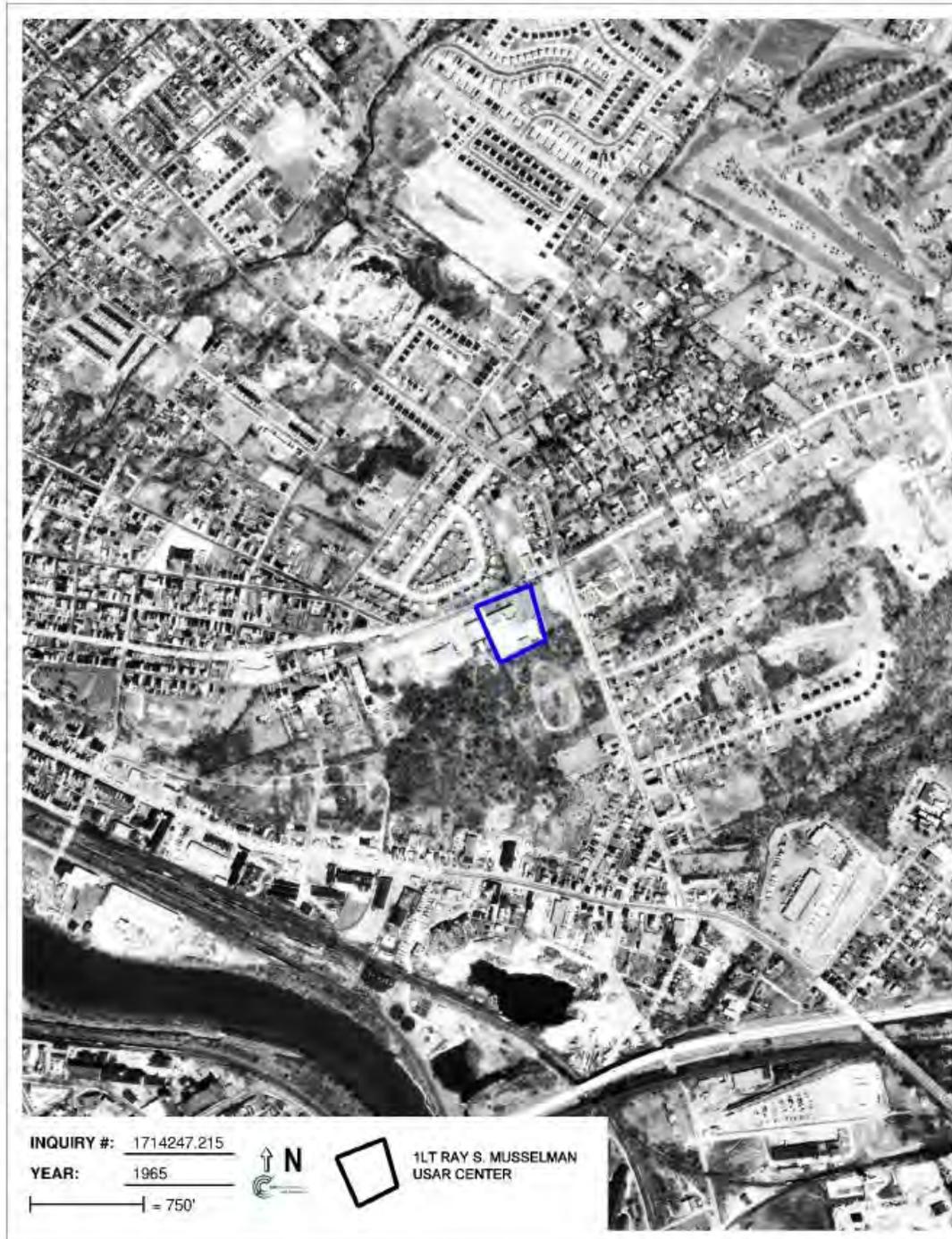


**FIGURE 5**  
 1958 Aerial Photograph  
 Phase I ECP Report

ES082006013MKE - Musselman Figure 5 1958 Aerial Photograph

**CH2MHILL**

**Figure A-10. Location of Musselman USARC overlay on 1958 aerial photograph [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**

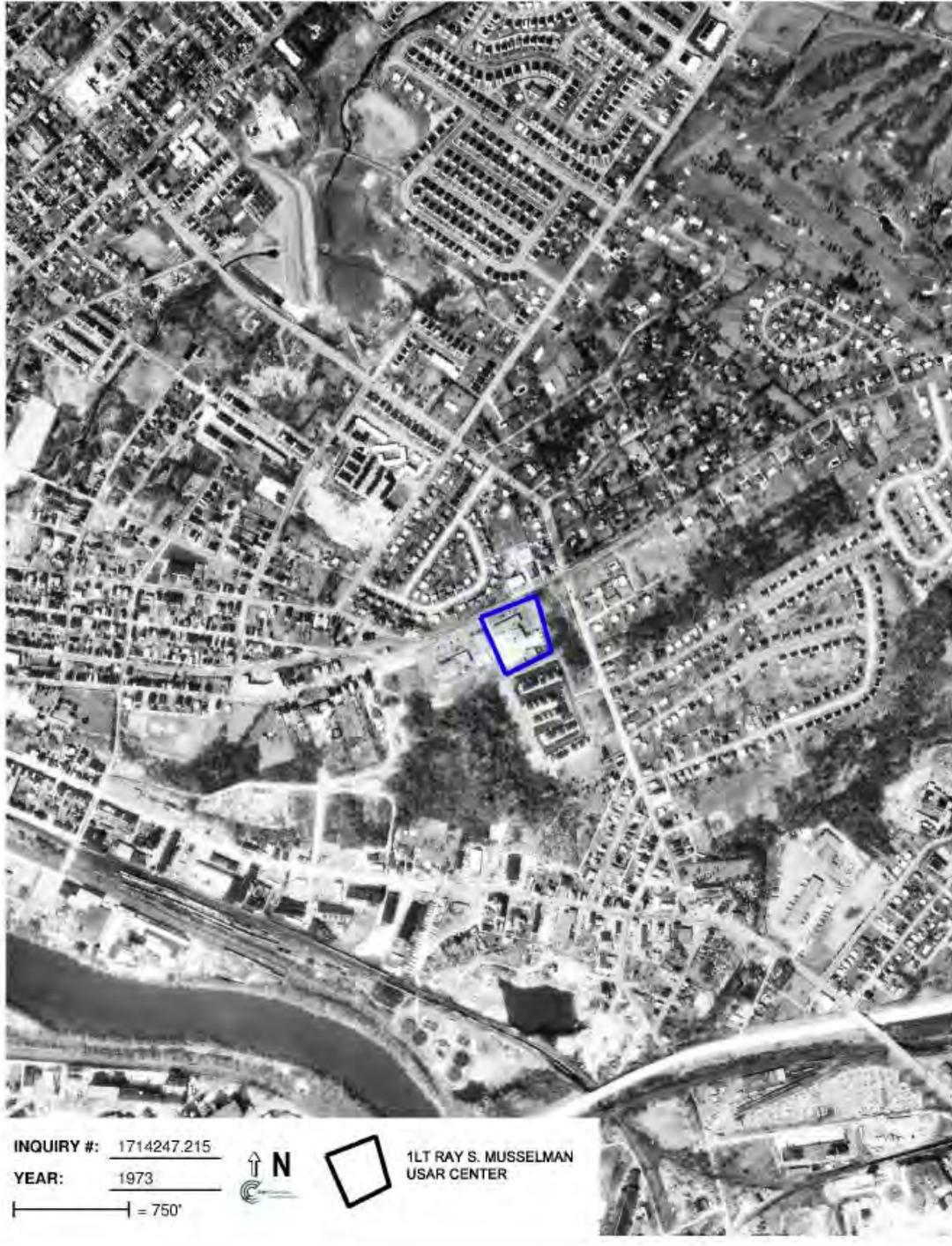


**FIGURE 6**  
 1965 Aerial Photograph  
 Phase I ECP Report

CH2MHILL

ES082006013MKE - Musselman Figure 6 1965 Aerial Photograph

**Figure A-11. Location of Musselman USARC overlay on 1965 aerial photograph [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**

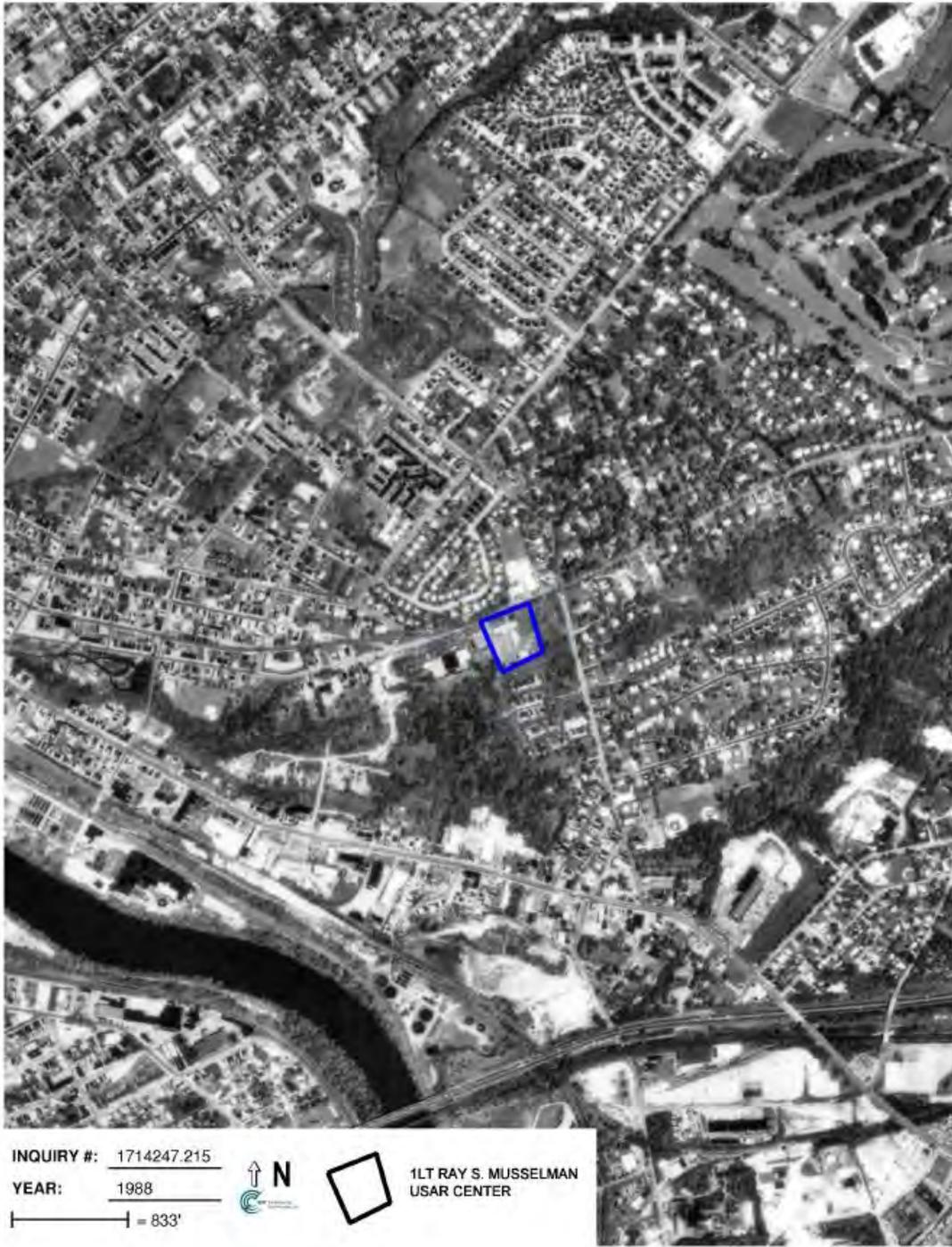


**FIGURE 7**  
 1973 Aerial Photograph  
 Phase I ECP Report

**CH2MHILL**

E5082006013MKE - Musselman Figure 7 1973 Aerial Photograph

**Figure A-12. Location of Musselman USARC overlay on 1973 aerial photograph [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**

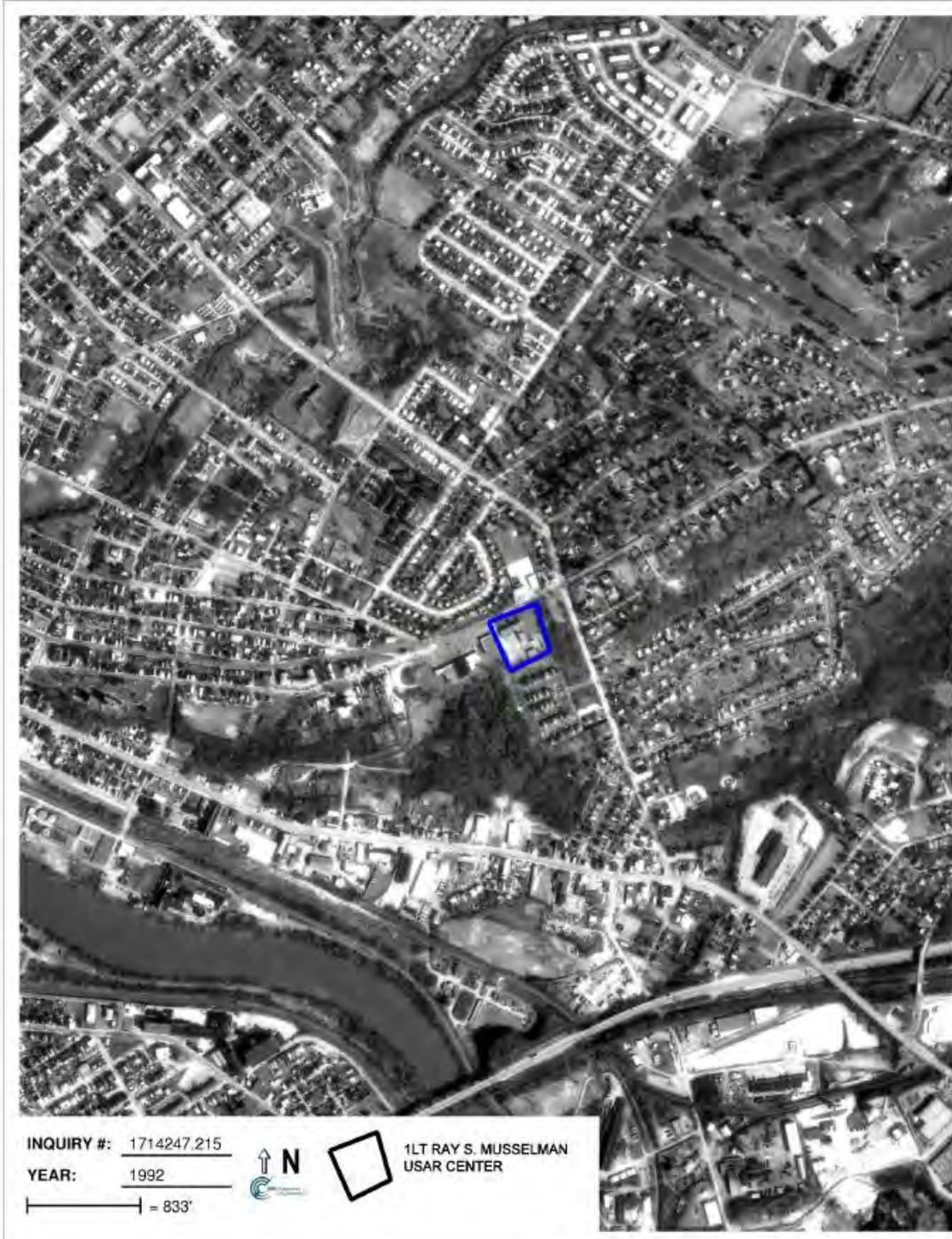


**FIGURE 8**  
 1988 Aerial Photograph  
 Phase I ECP Report

ES002006013MKE - Musselman Figure 8 1988 Aerial Photograph

**CH2MHILL**

**Figure A-13. Location of Musselman USARC overlay on 1988 aerial photograph [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).**



**FIGURE 9**  
 1992 Aerial Photograph  
 Phase I ECP Report

**CH2MHILL**

F5087006013MKF - Musselman Figure 9 1992 Aerial Photograph  
**Figure A-14.** Location of Musselman USAR Center overlay on 1992 aerial photograph [not to scale] (From ECP Report [USACE-Louisville 2007: Appendix A]).



Figure A-15. Musselman USARC Property Boundary overlay on recent Aerial Photograph (ArcGIS).

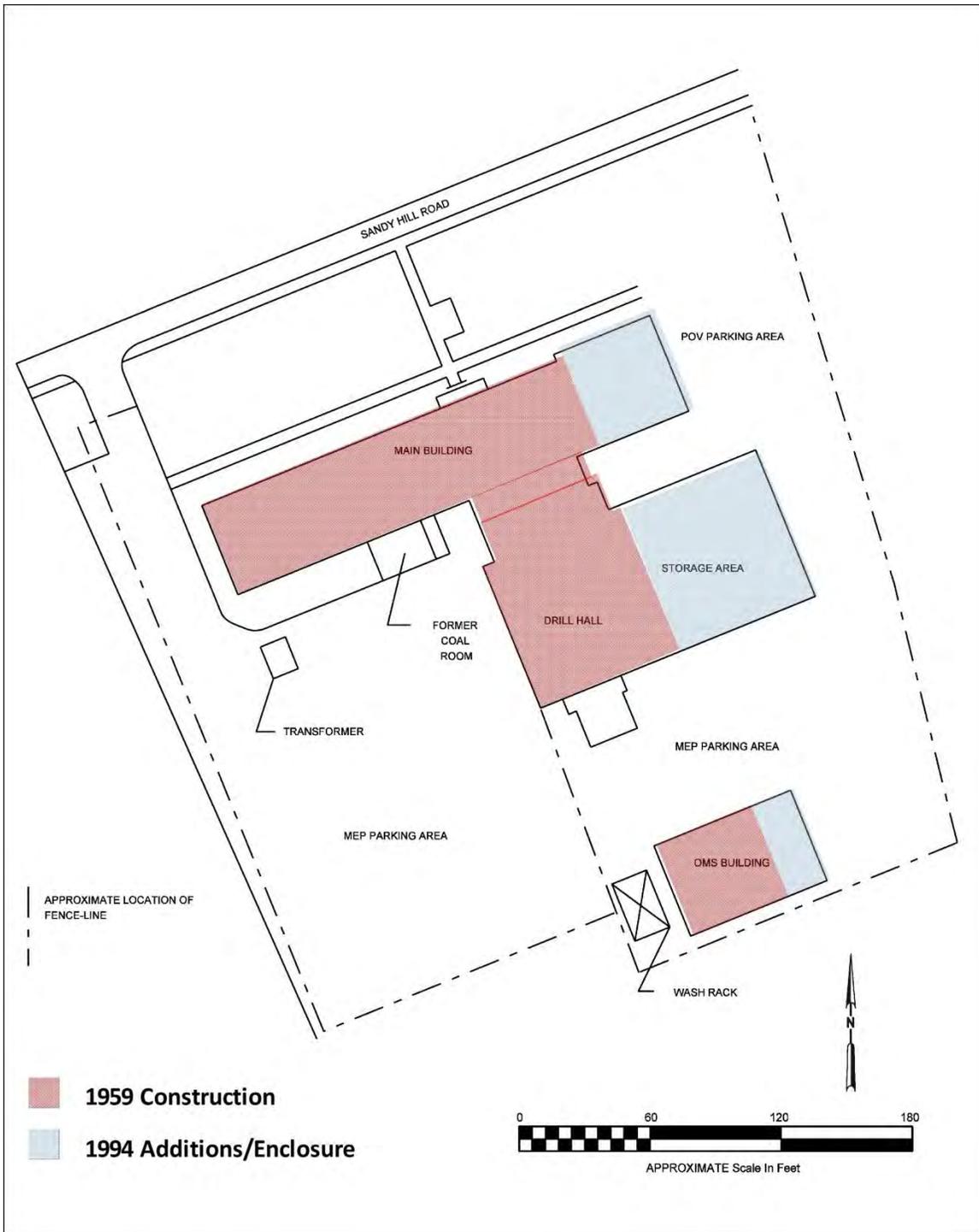


Figure A-16. Musselman USARC, current architectural footprint of the main building and OMS (altered from ECP [not to scale]).

**APPENDIX B  
PHOTOGRAPHS**

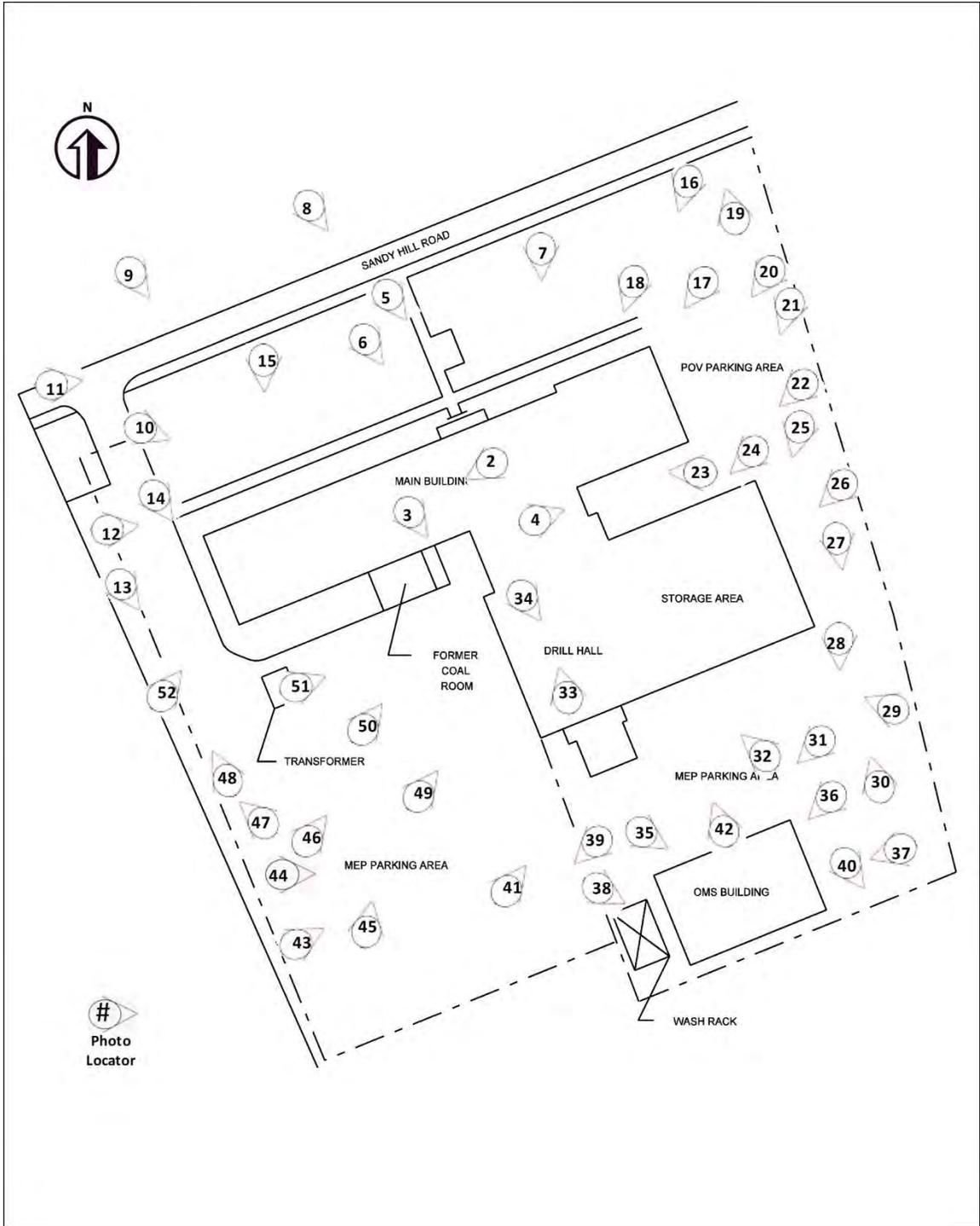


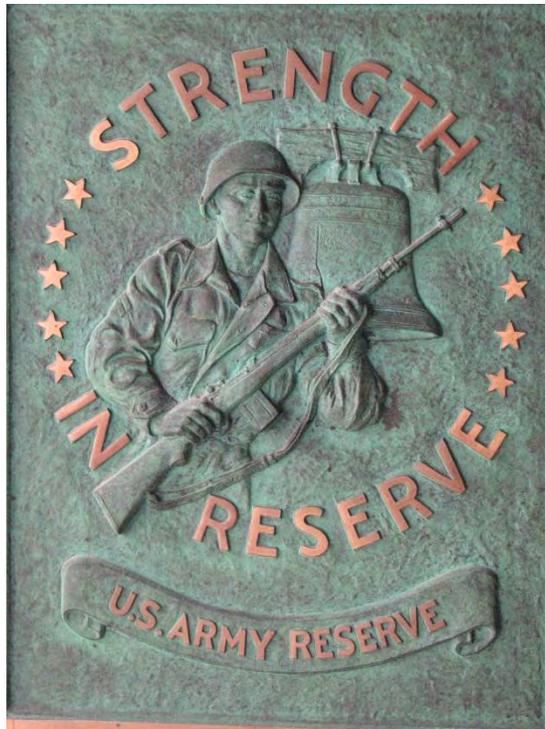
Figure B-1. Key to Appendix B photographs.



**Figure B-2. Photo of First Lieutenant Ray S. Musselman (found on wall of main building).**



**Figure B-3. Photo of plaque memorializing 1LT Ray S. Musselman (found in main lobby of main building).**



**Figure B-4. Photo of plaque set in wall in foyer area of main building.**



Figure B-5. Facing southeast toward main entrance on front (north) elevation of main building.



Figure B-6. Facing southeast toward sign in front of main building.



Figure B-7. Facing south toward front (north) elevation of main building.



**Figure B-8. Facing southeast across Sandy Hill Road toward main entrance on front (north) elevation of main building. Note: enclosed windows are located in the break of the window fenestration right of the entry.**



**Figure B-9. Facing southeast across Sandy Hill Road toward west end of front (north) elevation of main building.**



**Figure B-10. Facing east-southeast toward front (north) elevation of main building from northwest corner of USARC property.**



**Figure B-11. Facing east across north end of USARC property from northwest corner of USARC property.**



**Figure B-12. Facing northeast toward front (north) elevation of main building from northwest corner of main building.**



**Figure B-13. Facing southeast across parking lot toward rear (south) of USARC property from west end of main building.**



**Figure B-14. Facing southeast toward northwestern corner of main building.**



**Figure B-15. Facing south across north end of USARC property toward front (north) elevation of main building.**



**Figure B-16. Facing south-southwest toward front (north) elevation of main building from northeastern corner of USARC property.**



**Figure B-17. Facing southwest toward northeastern corner of main building, showing the 1994 one-story addition (foreground).**



**Figure B-18. Facing south-southwest toward front (north) elevation of main building.**



**Figure B-19. Facing north-northwest across Sandy Hill toward commercial property adjacent to northeast corner of USARC property.**



**Figure B-20. Facing southwest toward east elevation of 1994 addition to east end of main building.**



**Figure B-21. Facing south-southwest toward east elevation of 1994 addition to east end of main building.**



**Figure B-22.** Facing southwest toward east elevation of 'hyphen' connecting drill hall and north end of main building.



**Figure B-23.** Facing northwest toward southeast corner of 1994 addition to east end of main building.



**Figure B-24.** Facing southwest toward north elevation of 1994 storage area addition to the drill hall of main building.



**Figure B-25.** Facing southwest toward northeastern corner of 1994 storage area addition to drill hall of main building.



**Figure B-26. Facing southwest toward east elevation of 1994 storage area addition to drill hall of main building.**



**Figure B-27. Facing southeast across parking lot toward rear (south) of USARC property from east end of 1994 storage area addition to drill hall of main building.**



**Figure B-28. Facing south across parking lot toward northeast corner of OMS.**



**Figure B-29. Facing west-northwest toward southeast corner of 1994 storage area addition to drill hall of main building.**



**Figure B-30.** Facing northwest across parking lot toward front (north) end of USARC property.



**Figure B-31.** Facing southwest across parking lot between OMS and main building toward western end of USARC property.



**Figure B-32. Facing northwest toward rear (south) elevations of 1994 storage area addition to drill hall and drill hall of main building.**



**Figure B-33. Interior of drill hall facing door to 'hyphen' on left and door to storage addition on right.**



**Figure B-34. Interior of drill hall facing roll-up door on south end.**



**Figure B-35. Facing southeast toward front (north) elevation of OMS.**



**Figure B-36.** Facing southwest toward northeastern corner of OMS, showing the enclosure of one bay.



**Figure B-37.** Facing west-southwest toward east elevation of OMS.



**Figure B-38. Facing southeast toward west elevation of OMS.**



**Figure B-39. Facing southwest across parking lot toward rear (southwest) of USARC property.**



**Figure B-40. Facing southeast toward adjacent properties to south of USARC property from east side of OMS.**



**Figure B-41. Facing northeast toward rear (south) elevations of 1994 storage area addition to drill hall and drill hall of main building.**



**Figure B-42. Facing north-northwest toward rear (south) elevation of 1994 storage area addition to drill hall.**



**Figure B-43. Facing northeast across parking lot between OMS and main building toward eastern end of USARC property.**



**Figure B-44.** Facing east across rear parking lot toward OMS from western end of USARC property.



**Figure B-45.** Facing north-northeast across rear parking lot toward west elevation of drill hall portion of main building.



**Figure B-46. Facing northeast across parking lot toward rear (south) elevation of main building.**



**Figure B-47. Facing northwest toward adjacent commercial property to west of USARC property from rear parking lot.**



**Figure B-48. Facing northwest across rear parking lot toward front (north) end of USARC property from southwestern corner of USARC property.**



**Figure B-49. Facing northeast across parking lot toward west elevation of drill hall portion of main building.**



**Figure B-50. Facing northeast toward rear (south) elevation of main building and ‘hyphen’ connecting to drill hall.**



**Figure B-51. Facing east-northeast toward rear (south) elevation of main building and 'hyphen' connecting drill hall.**



**Figure B-52. Facing northeast toward southwestern corner USARC property.**

## **APPENDIX D. AIR EMISSIONS**

This appendix contains a Record of Non-Applicability (RONA) documenting the determination that the Proposed Action falls into conformity with the U.S. Environmental Protection Agency-approved state implementation plans and a written Conformity Determination is not required. This appendix also contains air emission calculations performed for this environmental assessment.



## RECORD OF NON-APPLICABILITY

In Accordance with the Clean Air Act – General Conformity Rule for

Disposal of the 1LT Ray S. Musselman Memorial United States Army Reserve Center,  
Norristown, Pennsylvania

February 21, 2012

In accordance with the 2005 Base Closure and Realignment Commission, the U.S. Army will close the 1LT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, Pennsylvania, and dispose according to applicable laws, regulations, and national policy. Foreseeable reuse alternatives include a public benefit conveyance through the U.S. Department of Education to the Norristown Area School District for a new elementary school.

General Conformity under the Clean Air Act, Section 176 has been evaluated for the project described above according to the requirements of 40 CFR 93, Subpart B. The General Conformity Rule applies to federal actions occurring in regions designated as being in nonattainment for the NAAQS or in attainment areas subject to maintenance plans (maintenance areas). Threshold (*de minimis*) rates of emissions have been established for federal actions with the potential to have significant air quality impacts. If a project/action located in an area designated as nonattainment exceeds these *de minimis* levels, a general conformity analysis is required. Montgomery County, PA, is designated as a moderate ozone nonattainment area, and thus NO<sub>x</sub> and VOC thresholds apply. Montgomery County is also designated as a PM<sub>2.5</sub> nonattainment area, and PM<sub>2.5</sub> thresholds apply.

A General Conformity Analysis of this project is not required because:

Total direct and indirect long term emissions from reuse would include heating and cooling of the building and vehicular traffic generated by the school. These emissions would be only slightly larger than existing emissions and would be less than the annual *de minimis* values.

The *de minimis* values established in 40 CFR 93.153 are:

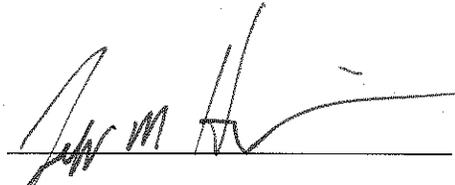
NO<sub>x</sub>: 100 tons; VOC: 50 tons; PM<sub>2.5</sub>: 100 tons

Furthermore, the project is not considered regionally significant under 40 CFR 93.153 (i).

Montgomery County, PA is in attainment for criteria pollutants CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and Pb and therefore these pollutants are not subject to conformity review.

Supporting documentation and emission estimates:

- Are Attached
- Appear in the NEPA Documentation
- Other (Not Necessary)

A handwritten signature in black ink, appearing to read 'Jeff M Hrzic', is written over a horizontal line.

Jeffrey M. Hrzic  
Chief, Environmental Division  
99<sup>th</sup> RSC DPW

**Musselman Mobile Sources - Estimated Annual Emissions**  
**Alternative 1: Traditional disposal and Reuse**

Criteria Pollutant and Carbon Dioxide Emission Factors:

Source: <http://www.aqmd.gov/ceqa/handbook/onroad/onroad> (Accessed February 3, 2012)

Passenger Vehicles -

The following emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model, taking the weighted average of vehicle types.

Scenario Year 2012

Criteria Pollutant	Pounds per mile
CO	0.00765475
NOx	0.00077583
ROG	0.00079628
SOx	0.0001073
PM10	0.00008979
PM2.5	0.00005750
CO2	1.10152540
CH4	0.00007169

School Bus (Diesel Vehicles) -

The following emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model and extracting the **Heavy-Heavy-Duty Diesel Truck (HHDT)** Emission Factors.

Scenario Year 2012

Criteria Pollutant	Pounds per mile
CO	0.010215194
NOx	0.03092379
ROG	0.002527642
SOx	4.04233E-05
PM10	0.00149566
PM2.5	0.001293544
CO2	4.21590774
CH4	0.000116514

Assumptions and Calculations:

- 180 Days per school year
- 18 Number of staff automobiles (passenger vehicles) per day
- 5 Number of visitor automobiles per day
- 6 Number of school buses per day
- 20 Average number of miles driven per day per automobile
- 100 Average number of miles driven per day per school bus
  
- 82,800 Annual number of miles by passenger vehicle
- 108,000 Annual number of miles by school bus

Passenger Vehicle Emissions -

School Bus (Diesel Vehicle) Emissions -

Pollutant	Pounds	Pollutant	Pounds
CO	633.81	CO	1,103.24
NOx	64.24	NOx	3,339.77
ROG	65.93	ROG	272.99
SOx	0.89	SOx	4.37
PM10	7.43	PM10	161.53
PM2.5	4.76	PM2.5	139.70
CO2	91,206.30	CO2	455,318.04
CH4	5.94	CH4	12.58

Total Vehicle Emissions -

Pollutant	Pounds	Tons	Kilograms	Metric Tons
CO	1,737.05	0.87	787.91	0.79
NOx	3,404.01	1.70	1,544.02	1.54
ROG	338.92	0.17	153.73	0.15
SOx	5.25	0.0026	2.38	0.0024
PM10	168.97	0.084	76.64	0.077
PM2.5	144.46	0.072	65.53	0.066
CO2	546,524.34	273.26	247,897.97	247.90
CH4	18.52	0.0093	8.40	0.0084

**Musselman Mobile Sources - Estimated Annual Emissions  
Alternative 2: Caretaker Status**

Criteria Pollutant and Carbon Dioxide Emission Factors:

Source: <http://www.aqmd.gov/ceqa/handbook/onroad/onroad>

(Accessed February 3, 2012)

Passenger Vehicles -

The following emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model, taking the weighted average of vehicle types.

Scenerio Year 2012

Criteria Pollutant	Pounds per mile
CO	0.00765475
NOx	0.00077583
ROG	0.00079628
SOx	0.0001073
PM10	0.00008979
PM2.5	0.00005750
CO2	1.10152540
CH4	0.00007169

Assumptions and Calculations:

- 365 Days per year
- 1 Number of maintenance vehicles (passenger vehicles) per day
- 20 Average number of miles driven per day per automobile

7,300 Annual number of miles by passenger vehicle

Passenger Vehicle Emissions -

Pollutant	Pounds
CO	55.88
NOx	5.66
ROG	5.81
SOx	0.08
PM10	0.66
PM2.5	0.42
CO2	8,041.14
CH4	0.52

Total Vehicle Emissions -

Pollutant	Pounds	Tons	Kilograms	Metric Tons
CO	55.88	0.028	25.35	0.025
NOx	5.66	0.0028	2.57	0.0026
ROG	5.81	0.0029	2.64	0.0026
SOx	0.08	0.000039	0.04	0.000036
PM10	0.66	0.00033	0.30	0.00030
PM2.5	0.42	0.00021	0.19	0.00019
CO2	8,041.14	4.0	3,647.38	3.6
CH4	0.52	0.00026	0.24	0.00024

**Musselman Mobile Sources - Estimated Annual Emissions  
Alternative 3: No Action Alternative**

Criteria Pollutant and Carbon Dioxide Emission Factors:

Source: <http://www.aqmd.gov/ceqa/handbook/onroad/onroad> (Accessed February 3, 2012)

Passenger Vehicles -

The following emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model, taking the weighted average of vehicle types.

Scenario Year 2012

Criteria Pollutant	Pounds per mile
CO	0.00765475
NOx	0.00077583
ROG	0.00079628
SOx	0.00001073
PM10	0.00008979
PM2.5	0.00005750
CO2	1.10152540
CH4	0.00007169

Assumptions and Calculations:

- 260 Work days per year (52 weeks per year, 5 days per week)
- 7 Number of workers (passenger vehicles) per day
- 20 Average number of miles driven per day per worker automobile
  
- 12 Drill weekends per year (assume 1 per month)
- 40 Number of reservists per drill weekend
- 50 Average number of miles driven per drill weekend per reservist
  
- 60,400 Annual number of miles driven - Total

Passenger Vehicle Emissions -

Pollutant	Pounds
CO	462.35
NOx	46.86
ROG	48.10
SOx	0.65
PM10	5.42
PM2.5	3.47
CO2	66,532.13
CH4	4.33

Total Vehicle Emissions -

Pollutant	Pounds	Tons	Kilograms	Metric Tons
CO	462.35	0.23	209.72	0.21
NOx	46.86	0.023	21.26	0.021
ROG	48.10	0.024	21.82	0.022
SOx	0.65	0.00032	0.29	0.00029
PM10	5.42	0.0027	2.46	0.0025
PM2.5	3.47	0.0017	1.58	0.0016
CO2	66,532.13	33	30,178.31	30
CH4	4.33	0.0022	1.96	0.0020



## Highest (Most Conservative) EMFAC2007 (version 2.3) Emission Factors for On-Road Passenger Vehicles & Delivery Trucks

Projects in the SCAQMD (Scenario Years 2007 - 2026)  
Derived from Peak Emissions Inventory (**Winter**, **Annual**, **Summer**)  
Source: <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>

### Vehicle Class:

### Passenger Vehicles (<8500 pounds) & Delivery Trucks (>8500 pounds)

The following emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model, taking the weighted average of vehicle types and simplifying into two categories:  
**Passenger Vehicles & Delivery Trucks.**

These emission factors can be used to calculate on-road mobile source emissions for the vehicle categories listed in the tables below, by use of the following equation:

$$\text{Emissions (pounds per day)} = N \times TL \times EF$$

where N = number of trips, TL = trip length (miles/day), and EF = emission factor (pounds per mile)

This methodology replaces the old EMFAC emission factors in Tables A-9-5-J-1 through A-9-5-L in Appendix A9 of the current SCAQMD CEQA Handbook. All the emission factors account for the emissions from start, running and idling exhaust. In addition, the ROG emission factors include diurnal, hot soak, running and resting emissions, and the PM10 & PM2.5 emission factors include tire and brake wear.

#### Scenario Year: 2007

All model years in the range 1965 to 2007

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.01155158	CO	0.02407553
NOx	0.00121328	NOx	0.02508445
ROG	0.00118234	ROG	0.00323145
SOx	0.00001078	SOx	0.00002626
PM10	0.00008447	PM10	0.00091020
PM2.5	0.00005243	PM2.5	0.00078884
CO2	1.10672236	CO2	2.72245619
CH4	0.00010306	CH4	0.00016030

#### Scenario Year: 2008

All model years in the range 1965 to 2008

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.01054844	CO	0.02194915
NOx	0.00110288	NOx	0.02371258
ROG	0.00107919	ROG	0.00299270
SOx	0.00001075	SOx	0.00002565
PM10	0.00008505	PM10	0.00085607
PM2.5	0.00005293	PM2.5	0.00073933
CO2	1.09953226	CO2	2.71943400
CH4	0.00009465	CH4	0.00014769

#### Scenario Year: 2009

All model years in the range 1965 to 2009

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00968562	CO	0.02016075
NOx	0.00100518	NOx	0.02236636
ROG	0.00099245	ROG	0.00278899
SOx	0.00001066	SOx	0.00002679
PM10	0.00008601	PM10	0.00080550
PM2.5	0.00005384	PM2.5	0.00069228
CO2	1.09755398	CO2	2.72330496
CH4	0.00008767	CH4	0.00013655

#### Scenario Year: 2010

All model years in the range 1966 to 2010

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00826276	CO	0.01843765
NOx	0.00091814	NOx	0.02062460
ROG	0.00091399	ROG	0.00258958
SOx	0.00001077	SOx	0.00002701
PM10	0.00008698	PM10	0.00075121
PM2.5	0.00005478	PM2.5	0.00064233
CO2	1.09568235	CO2	2.73222199
CH4	0.00008146	CH4	0.00012576



## Highest (Most Conservative) EMFAC2007 (version 2.3) Emission Factors for On-Road Passenger Vehicles & Delivery Trucks

Projects in the SCAQMD (Scenario Years 2007 - 2026)  
Derived from Peak Emissions Inventory (**Winter**, **Annual**, **Summer**)

### Vehicle Class:

### Passenger Vehicles (<8500 pounds) & Delivery Trucks (>8500 pounds)

Scenario Year: **2011**

All model years in the range 1967 to 2011

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00826276	CO	0.01693242
NOx	0.00084460	NOx	0.01893366
ROG	0.00085233	ROG	0.00241868
SOx	0.00001077	SOx	0.00002728
PM10	0.00008879	PM10	0.00070097
PM2.5	0.00005653	PM2.5	0.00059682
CO2	1.10235154	CO2	2.75180822
CH4	0.00007678	CH4	0.00011655

Scenario Year: **2012**

All model years in the range 1968 to 2012

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00765475	CO	0.01545741
NOx	0.00077583	NOx	0.01732423
ROG	0.00079628	ROG	0.00223776
SOx	0.00001073	SOx	0.00002667
PM10	0.00008979	PM10	0.00064975
PM2.5	0.00005750	PM2.5	0.00054954
CO2	1.10152540	CO2	2.76628414
CH4	0.00007169	CH4	0.00010668

Scenario Year: **2013**

All model years in the range 1969 to 2013

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00709228	CO	0.01407778
NOx	0.00071158	NOx	0.01577311
ROG	0.00074567	ROG	0.00206295
SOx	0.00001072	SOx	0.00002682
PM10	0.00009067	PM10	0.00059956
PM2.5	0.00005834	PM2.5	0.00050174
CO2	1.10087435	CO2	2.78163459
CH4	0.00006707	CH4	0.00009703

Scenario Year: **2014**

All model years in the range 1970 to 2014

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00660353	CO	0.01284321
NOx	0.00065484	NOx	0.01425162
ROG	0.00070227	ROG	0.00189649
SOx	0.00001069	SOx	0.00002754
PM10	0.00009185	PM10	0.00054929
PM2.5	0.00005939	PM2.5	0.00045519
CO2	1.10257205	CO2	2.79845465
CH4	0.00006312	CH4	0.00008798

Scenario Year: **2015**

All model years in the range 1971 to 2015

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00614108	CO	0.01169445
NOx	0.00060188	NOx	0.01285026
ROG	0.00066355	ROG	0.00173890
SOx	0.00001070	SOx	0.00002741
PM10	0.00009259	PM10	0.00050307
PM2.5	0.00006015	PM2.5	0.00041268
CO2	1.10192837	CO2	2.81247685
CH4	0.00005923	CH4	0.00008076

Scenario Year: **2016**

All model years in the range 1972 to 2016

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00575800	CO	0.01080542
NOx	0.00055658	NOx	0.01172881
ROG	0.00063254	ROG	0.00161521
SOx	0.00001071	SOx	0.00002767
PM10	0.00009392	PM10	0.00046606
PM2.5	0.00006131	PM2.5	0.00037868
CO2	1.10677664	CO2	2.83134285
CH4	0.00005623	CH4	0.00007355



## Highest (Most Conservative) EMFAC2007 (version 2.3) Emission Factors for On-Road Passenger Vehicles & Delivery Trucks

Projects in the SCAQMD (Scenario Years 2007 - 2026)  
Derived from Peak Emissions Inventory (**Winter**, **Annual**, **Summer**)

### Vehicle Class:

### Passenger Vehicles (<8500 pounds) & Delivery Trucks (>8500 pounds)

Scenario Year: **2017**

All model years in the range 1973 to 2017

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00537891	CO	0.00998101
NOx	0.00051297	NOx	0.01070034
ROG	0.00060109	ROG	0.00150242
SOx	0.00001079	SOx	0.00002723
PM10	0.00009446	PM10	0.00043131
PM2.5	0.00006192	PM2.5	0.00034605
CO2	1.10627489	CO2	2.84005015
CH4	0.00005300	CH4	0.00006663

Scenario Year: **2018**

All model years in the range 1974 to 2018

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00502881	CO	0.00923234
NOx	0.00047300	NOx	0.00979416
ROG	0.00057178	ROG	0.00139856
SOx	0.00001071	SOx	0.00002749
PM10	0.00009494	PM10	0.00040110
PM2.5	0.00006234	PM2.5	0.00031792
CO2	1.10562643	CO2	2.84646835
CH4	0.00005003	CH4	0.00006203

Scenario Year: **2019**

All model years in the range 1975 to 2019

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00471820	CO	0.00857192
NOx	0.00043716	NOx	0.00900205
ROG	0.00054654	ROG	0.00130563
SOx	0.00001072	SOx	0.00002706
PM10	0.00009523	PM10	0.00037393
PM2.5	0.00006259	PM2.5	0.00029276
CO2	1.10496100	CO2	2.85060182
CH4	0.00004743	CH4	0.00005619

Scenario Year: **2020**

All model years in the range 1976 to 2020

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00444247	CO	0.00799617
NOx	0.00040506	NOx	0.00831802
ROG	0.00052463	ROG	0.00122382
SOx	0.00001073	SOx	0.00002733
PM10	0.00009550	PM10	0.00035054
PM2.5	0.00006279	PM2.5	0.00027128
CO2	1.10456157	CO2	2.85148109
CH4	0.00004495	CH4	0.00005330

Scenario Year: **2021**

All model years in the range 1977 to 2021

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00421218	CO	0.00748303
NOx	0.00037757	NOx	0.00773500
ROG	0.00050573	ROG	0.00115568
SOx	0.00001073	SOx	0.00002755
PM10	0.00009640	PM10	0.00033125
PM2.5	0.00006364	PM2.5	0.00025331
CO2	1.11009559	CO2	2.86434187
CH4	0.00004322	CH4	0.00004905

Scenario Year: **2022**

All model years in the range 1978 to 2022

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00397866	CO	0.00699290
NOx	0.00035150	NOx	0.00722470
ROG	0.00048658	ROG	0.00108569
SOx	0.00001072	SOx	0.00002774
PM10	0.00009661	PM10	0.00031501
PM2.5	0.00006389	PM2.5	0.00023906
CO2	1.11019931	CO2	2.87006769
CH4	0.00004121	CH4	0.00004557



## Highest (Most Conservative) EMFAC2007 (version 2.3) Emission Factors for On-Road Passenger Vehicles & Delivery Trucks

Projects in the SCAQMD (Scenario Years 2007 - 2026)  
Derived from Peak Emissions Inventory (**Winter**, **Annual**, **Summer**)

### Vehicle Class:

### Passenger Vehicles (<8500 pounds) & Delivery Trucks (>8500 pounds)

Scenario Year: **2023**

All model years in the range 1979 to 2023

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00377527	CO	0.00658123
NOx	0.00032851	NOx	0.00679147
ROG	0.00046900	ROG	0.00102852
SOx	0.00001070	SOx	0.00002790
PM10	0.00009676	PM10	0.00030109
PM2.5	0.00006405	PM2.5	0.00022582
CO2	1.11023373	CO2	2.87466338
CH4	0.00003951	CH4	0.00004218

Scenario Year: **2024**

All model years in the range 1980 to 2024

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00358611	CO	0.00625076
NOx	0.00030721	NOx	0.00647083
ROG	0.00045136	ROG	0.00096578
SOx	0.00001080	SOx	0.00002807
PM10	0.00009676	PM10	0.00029407
PM2.5	0.00006410	PM2.5	0.00021880
CO2	1.11061572	CO2	2.88010717
CH4	0.00003781	CH4	0.00004019

Scenario Year: **2025**

All model years in the range 1981 to 2025

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00342738	CO	0.00595363
NOx	0.00028846	NOx	0.00615945
ROG	0.00043545	ROG	0.00092178
SOx	0.00001070	SOx	0.00002761
PM10	0.00009679	PM10	0.00028425
PM2.5	0.00006418	PM2.5	0.00020958
CO2	1.11078571	CO2	2.88143570
CH4	0.00003641	CH4	0.00003765

Scenario Year: **2026**

All model years in the range 1982 to 2026

Passenger Vehicles (pounds/mile)		Delivery Trucks (pounds/mile)	
CO	0.00328779	CO	0.00569435
NOx	0.00027141	NOx	0.00589869
ROG	0.00042052	ROG	0.00088403
SOx	0.00001076	SOx	0.00002716
PM10	0.00009687	PM10	0.00027657
PM2.5	0.00006415	PM2.5	0.00020187
CO2	1.11105829	CO2	2.88298299
CH4	0.00003518	CH4	0.00003581

# Highest (Most Conservative) EMFAC2007 (version 2.3) Emission Factors for On-Road Heavy-Heavy-Duty Diesel Trucks

Projects in the SCAQMD (Scenario Years 2007 - 2026)  
Derived from Peak Emissions Inventory (**Winter**, Annual, **Summer**)

## Vehicle Class: Heavy-Heavy-Duty Diesel Trucks (33,001 to 60,000 pounds)

The following emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model and extracting the **Heavy-Heavy-Duty Diesel Truck (HHDT)** Emission Factors.

These emission factors can be used to calculate on-road mobile source emissions for the vehicle/emission categories listed in the tables below, by use of the following equation:

$$\text{Emissions (pounds per day)} = N \times TL \times EF$$

where N = number of trips, TL = trip length (miles/day), and EF = emission factor (pounds per mile)

The **HHDT-DSL** vehicle/emission category accounts for all emissions from heavy-heavy-duty diesel trucks, including start, running and idling exhaust. In addition, ROG emission factors account for diurnal, hot soak, running and resting emissions, and the PM10 & PM2.5 emission factors account for tire and brake wear.

The **HHDT-DSL, Exh** vehicle/emission category includes only the exhaust portion of PM10 & PM2.5 emissions from heavy-heavy-duty diesel trucks.

Scenario Year: **2007**

All model years in the range 1965 to 2007

HHDT-DSL (pounds/mile)	
CO	0.01446237
NOx	0.04718166
ROG	0.00372949
SOx	0.00003962
PM10	0.00230900
PM2.5	0.00204018
CO2	4.22184493

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00216752
PM2.5	0.00199491

Scenario Year: **2008**

All model years in the range 1965 to 2008

HHDT-DSL (pounds/mile)	
CO	0.01361368
NOx	0.04458017
ROG	0.00351579
SOx	0.00004136
PM10	0.00215635
PM2.5	0.00189990
CO2	4.21067145
CH4	0.00016269

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00201296
PM2.5	0.00185303

Scenario Year: **2009**

All model years in the range 1965 to 2009

HHDT-DSL (pounds/mile)	
CO	0.01282236
NOx	0.04184591
ROG	0.00329320
SOx	0.00004013
PM10	0.00199572
PM2.5	0.00175227
CO2	4.21080792
CH4	0.00015249

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00185393
PM2.5	0.00170680

Scenario Year: **2010**

All model years in the range 1966 to 2010

HHDT-DSL (pounds/mile)	
CO	0.01195456
NOx	0.03822102
ROG	0.00304157
SOx	0.00004131
PM10	0.00183062
PM2.5	0.00160083
CO2	4.21120578
CH4	0.00014201

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00168861
PM2.5	0.00155435

# Highest (Most Conservative) EMFAC2007 (version 2.3) Emission Factors for On-Road Heavy-Heavy-Duty Diesel Trucks

Projects in the SCAQMD (Scenario Years 2007 - 2026)

Derived from Peak Emissions Inventory (**Winter**, Annual, **Summer**)

Source: <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>

**Vehicle Class:**

**Heavy-Heavy-Duty Diesel Trucks (33,001 to 60,000 pounds)**

Scenario Year: **2011**

All model years in the range 1967 to 2011

HHDT-DSL (pounds/mile)	
CO	0.01112463
NOx	0.03455809
ROG	0.00279543
SOx	0.00003972
PM10	0.00166087
PM2.5	0.00144489
CO2	4.22045680
CH4	0.00012910

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00151936
PM2.5	0.00139772

Scenario Year: **2012**

All model years in the range 1968 to 2012

HHDT-DSL (pounds/mile)	
CO	0.01021519
NOx	0.03092379
ROG	0.00252764
SOx	0.00004042
PM10	0.00149566
PM2.5	0.00129354
CO2	4.21590774
CH4	0.00011651

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00135537
PM2.5	0.00124837

Scenario Year: **2013**

All model years in the range 1969 to 2013

HHDT-DSL (pounds/mile)	
CO	0.00931790
NOx	0.02742935
ROG	0.00226308
SOx	0.00004086
PM10	0.00133697
PM2.5	0.00114629
CO2	4.21518556
CH4	0.00010441

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00119623
PM2.5	0.00109863

Scenario Year: **2014**

All model years in the range 1970 to 2014

HHDT-DSL (pounds/mile)	
CO	0.00846435
NOx	0.02418049
ROG	0.00201594
SOx	0.00004092
PM10	0.00118458
PM2.5	0.00100582
CO2	4.21279345
CH4	0.00009261

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00104243
PM2.5	0.00096059

Scenario Year: **2015**

All model years in the range 1971 to 2015

HHDT-DSL (pounds/mile)	
CO	0.00766891
NOx	0.02122678
ROG	0.00178608
SOx	0.00004082
PM10	0.00104715
PM2.5	0.00087977
CO2	4.20902225
CH4	0.00008369

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00090631
PM2.5	0.00083282

Scenario Year: **2016**

All model years in the range 1972 to 2016

HHDT-DSL (pounds/mile)	
CO	0.00704604
NOx	0.01887374
ROG	0.00161035
SOx	0.00003952
PM10	0.00094448
PM2.5	0.00078443
CO2	4.21063031
CH4	0.00007508

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00080419
PM2.5	0.00073898

# Highest (Most Conservative) EMFAC2007 (version 2.3) Emission Factors for On-Road Heavy-Heavy-Duty Diesel Trucks

Projects in the SCAQMD (Scenario Years 2007 - 2026)  
Derived from Peak Emissions Inventory (**Winter**, **Annual**, **Summer**)

## Vehicle Class: Heavy-Heavy-Duty Diesel Trucks (33,001 to 60,000 pounds)

Scenario Year: **2017**

All model years in the range 1973 to 2017

HHDT-DSL (pounds/mile)	
CO	0.00650533
NOx	0.01690387
ROG	0.00145203
SOx	0.00004033
PM10	0.00084894
PM2.5	0.00069721
CO2	4.20820129
CH4	0.00006722

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00070873
PM2.5	0.00065111

Scenario Year: **2018**

All model years in the range 1974 to 2018

HHDT-DSL (pounds/mile)	
CO	0.00604721
NOx	0.01526414
ROG	0.00131697
SOx	0.00003934
PM10	0.00076808
PM2.5	0.00062383
CO2	4.20756838
CH4	0.00006182

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00062758
PM2.5	0.00057700

Scenario Year: **2019**

All model years in the range 1975 to 2019

HHDT-DSL (pounds/mile)	
CO	0.00565433
NOx	0.01389113
ROG	0.00120235
SOx	0.00004032
PM10	0.00070198
PM2.5	0.00056085
CO2	4.20637830
CH4	0.00005499

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00056085
PM2.5	0.00051320

Scenario Year: **2020**

All model years in the range 1976 to 2020

HHDT-DSL (pounds/mile)	
CO	0.00532242
NOx	0.01274755
ROG	0.00110621
SOx	0.00003957
PM10	0.00064574
PM2.5	0.00050904
CO2	4.20541416
CH4	0.00005216

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00050364
PM2.5	0.00046227

Scenario Year: **2021**

All model years in the range 1977 to 2021

HHDT-DSL (pounds/mile)	
CO	0.00503726
NOx	0.01179977
ROG	0.00103095
SOx	0.00004033
PM10	0.00059437
PM2.5	0.00046287
CO2	4.21495573
CH4	0.00004734

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00045411
PM2.5	0.00041729

Scenario Year: **2022**

All model years in the range 1978 to 2022

HHDT-DSL (pounds/mile)	
CO	0.00478830
NOx	0.01098794
ROG	0.00096142
SOx	0.00004106
PM10	0.00055427
PM2.5	0.00042597
CO2	4.21520828
CH4	0.00004448

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00041399
PM2.5	0.00037807

**Highest (Most Conservative) EMFAC2007 (version 2.3)  
Emission Factors for On-Road Heavy-Heavy-Duty Diesel Trucks**

Projects in the SCAQMD (Scenario Years 2007 - 2026)  
Derived from Peak Emissions Inventory (**Winter**, Annual, **Summer**)

**Vehicle Class:  
Heavy-Heavy-Duty Diesel Trucks (33,001 to 60,000 pounds)**

Scenario Year: **2023**

All model years in the range 1979 to 2023

HHDT-DSL (pounds/mile)	
CO	0.00457902
NOx	0.01031407
ROG	0.00090210
SOx	0.00004009
PM10	0.00052122
PM2.5	0.00039592
CO2	4.21483461
CH4	0.00004176

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00037922
PM2.5	0.00034915

Scenario Year: **2024**

All model years in the range 1980 to 2024

HHDT-DSL (pounds/mile)	
CO	0.00444444
NOx	0.00974372
ROG	0.00084009
SOx	0.00003930
PM10	0.00050766
PM2.5	0.00038320
CO2	4.19552935
CH4	0.00003930

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00036682
PM2.5	0.00033735

Scenario Year: **2025**

All model years in the range 1981 to 2025

HHDT-DSL (pounds/mile)	
CO	0.00431086
NOx	0.00932573
ROG	0.00080206
SOx	0.00004018
PM10	0.00048541
PM2.5	0.00036326
CO2	4.19512979
CH4	0.00003697

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00034397
PM2.5	0.00031664

Scenario Year: **2026**

All model years in the range 1982 to 2026

HHDT-DSL (pounds/mile)	
CO	0.00420297
NOx	0.00898990
ROG	0.00077178
SOx	0.00003946
PM10	0.00046717
PM2.5	0.00034564
CO2	4.19349747
CH4	0.00003630

HHDT-DSL, Exh (pounds/mile)	
PM10	0.00032670
PM2.5	0.00029830

**Musselman Stationary Sources (Natural Gas Heating) - Estimated Annual Emissions  
Alternative 1: Traditional disposal and Reuse**

**Criteria Pollutant Emission Factors:**

Source: U.S. Air Force Air Conformity Applicability Model Version 4.5, Technical Documentation, January 2010

**Commercial/Retail and Office/Employment Heating Emissions**

The following calculations for emissions were derived from information in the U.S. Air Force Air Conformity Applicability Model Version 4.5, Technical Documentation, January 2010

*Emission Calculation:*

$$E_p = F \times (1 - \text{CENHEAT}) \times \text{FACBTU} \times \text{EF}_p \times \frac{\sum_{f=1}^{NF} \text{GSF}_f}{2000}$$

*User-Input Variables:*

F = Fraction of the year the building operate.

CENHEAT = Fraction of facility heating provided by central heating plant (MMBtu basis).

GSF<sub>f</sub> = Facility gross floor area, square feet.

*Other Parameters:*

FACBTU = Heating energy requirement, MMBtu/square feet. Refer to Appendix K for energy requirements by region and building activity type.

EF<sub>p</sub> = Emission factor for pollutant, p, for natural gas heating (lb/MMBtu). The factors are as follows: CO = 0.0824, NO<sub>x</sub> = 0.1863, VOC = 0.0054, SO<sub>2</sub> = 0.0006 and PM<sub>10</sub> = 0.0075.

NF = Number of facilities.

2000 = Conversion factor from pounds to tons.

Reference: USEPA, 1998b.

**Assumptions:** (these assumptions produce the most conservative emission results: Maximum calculated emissions)

F =	1.0	
CENHEAT =	0.0	
GSF =	39,346	(Main administration building + Organizational Maintenance Shop)
FACBTU =	0.1016	(Appendix K: Northeast region, Education Building)
EF (CO) =	0.0824	
EF (NO <sub>x</sub> ) =	0.1863	
EF (VOC) =	0.0054	
EF (SO <sub>2</sub> ) =	0.0006	
EF (PM <sub>10</sub> ) =	0.0075	
NF =	1	

**Calculations:** (Emissions in tons per year)

CO Emissions =	0.16
NO <sub>x</sub> Emissions =	0.37
VOC Emissions =	0.011
SO <sub>2</sub> Emissions =	0.0012
PM <sub>10</sub> Emission =	0.015

**Carbon Dioxide (CO<sub>2</sub>) Emission Factors:**

Source: U.S. EPA, AP-42, Fifth Edition, Volume I, Chapter 1.4: Natural Gas Combustion (Table 1.4-2)

**Assumptions:**

Carbon Dioxide Emission Factor =	120,000	pounds per million standard cubic feet
	117.65	pounds per million Btu (MMBtu)
Annual MMBtu for heating =	3,998	(FACBTU * GSF) from criterial pollutant equation above

**Calculations:** (Emissions in tons per year)

CO <sub>2</sub> Emissions =	235
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**Musselman Stationary Sources (Natural Gas Heating) - Estimated Annual Emissions  
Alternative 2: Caretaker Status**

**Criteria Pollutant Emission Factors:**

Source: U.S. Air Force Air Conformity Applicability Model Version 4.5, Technical Documentation, January 2010

**Commercial/Retail and Office/Employment Heating Emissions**

The following calculations for emissions were derived from information in the U.S. Air Force Air Conformity Applicability Model Version 4.5, Technical Documentation, January 2010

Emission Calculation:

$$E_p = F \times (1 - \text{CENHEAT}) \times \text{FACBTU} \times \text{EF}_p \times \frac{\sum_{f=1}^{NF} \text{GSF}_f}{2000}$$

User-Input Variables:

F = Fraction of the year the building operate.

CENHEAT = Fraction of facility heating provided by central heating plant (MMBtu basis).

GSF<sub>f</sub> = Facility gross floor area, square feet.

Other Parameters:

FACBTU = Heating energy requirement, MMBtu/square feet. Refer to Appendix K for energy requirements by region and building activity type.

EF<sub>p</sub> = Emission factor for pollutant, p, for natural gas heating (lb/MMBtu). The factors are as follows: CO = 0.0824, NO<sub>x</sub> = 0.1863, VOC = 0.0054, SO<sub>2</sub> = 0.0006 and PM<sub>10</sub> = 0.0075.

NF = Number of facilities.

2000 = Conversion factor from pounds to tons.

Reference: USEPA, 1998b.

**Assumptions:** (these assumptions produce the most conservative emission results: Maximum calculated emissions)

F =	1.0	
CENHEAT =	0.0	
GSF =	39,346	(Main administration building + Organizational Maintenance Shop)
FACBTU =	0.0416	(Appendix K: Northeast region, Warehouse)
EF (CO) =	0.0824	
EF (NO <sub>x</sub> ) =	0.1863	
EF (VOC) =	0.0054	
EF (SO <sub>2</sub> ) =	0.0006	
EF (PM <sub>10</sub> ) =	0.0075	
NF =	1	

**Calculations:** (Emissions in tons per year)

CO Emissions =	0.067
NO <sub>x</sub> Emissions =	0.15
VOC Emissions =	0.0044
SO <sub>2</sub> Emissions =	0.00049
PM <sub>10</sub> Emission =	0.0061

**Carbon Dioxide (CO<sub>2</sub>) Emission Factors:**

Source: U.S. EPA, AP-42, Fifth Edition, Volume I, Chapter 1.4: Natural Gas Combustion (Table 1.4-2)

**Assumptions:**

Carbon Dioxide Emission Factor =	120,000	pounds per million standard cubic feet
	117.65	pounds per million Btu (MMBtu)
Annual MMBtu for heating =	1,637	(FACBTU * GSF) from criterial pollutant equation above

**Calculations:** (Emissions in tons per year)

CO <sub>2</sub> Emissions =	96
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**Musselman Stationary Sources (Natural Gas Heating) - Estimated Annual Emissions**  
**Alternative 3: No Action Alternative**

**Criteria Pollutant Emission Factors:**

Source: U.S. Air Force Air Conformity Applicability Model Version 4.5, Technical Documentation, January 2010

**Commercial/Retail and Office/Employment Heating Emissions**

The following calculations for emissions were derived from information in the U.S. Air Force Air Conformity Applicability Model Version 4.5, Technical Documentation, January 2010

Emission Calculation:

$$E_p = F \times (1 - \text{CENHEAT}) \times \text{FACBTU} \times \text{EF}_p \times \frac{\sum_{f=1}^{NF} \text{GSF}_f}{2000}$$

User-Input Variables:

F = Fraction of the year the building operate.

CENHEAT = Fraction of facility heating provided by central heating plant (MMBtu basis).

GSF<sub>f</sub> = Facility gross floor area, square feet.

Other Parameters:

FACBTU = Heating energy requirement, MMBtu/square feet. Refer to Appendix K for energy requirements by region and building activity type.

EF<sub>p</sub> = Emission factor for pollutant, p, for natural gas heating (lb/MMBtu). The factors are as follows: CO = 0.0824, NO<sub>x</sub> = 0.1863, VOC = 0.0054, SO<sub>2</sub> = 0.0006 and PM<sub>10</sub> = 0.0075.

NF = Number of facilities.

2000 = Conversion factor from pounds to tons.

Reference: USEPA, 1998b.

**Assumptions:** (these assumptions produce the most conservative emission results: Maximum calculated emissions)

F =	1.0	
CENHEAT =	0.0	
GSF =	39,346	(Main administration building + Organizational Maintenance Shop)
FACBTU =	0.0650	(Appendix K: Northeast region, Commercial/Retail)
EF (CO) =	0.0824	
EF (NO <sub>x</sub> ) =	0.1863	
EF (VOC) =	0.0054	
EF (SO <sub>2</sub> ) =	0.0006	
EF (PM <sub>10</sub> ) =	0.0075	
NF =	1	

**Calculations:** (Emissions in tons per year)

CO Emissions =	0.11
NO <sub>x</sub> Emissions =	0.24
VOC Emissions =	0.0069
SO <sub>2</sub> Emissions =	0.00077
PM <sub>10</sub> Emission =	0.010

**Carbon Dioxide (CO<sub>2</sub>) Emission Factors:**

Source: U.S. EPA, AP-42, Fifth Edition, Volume I, Chapter 1.4: Natural Gas Combustion (Table 1.4-2)

**Assumptions:**

Carbon Dioxide Emission Factor =	120,000	pounds per million standard cubic feet
	117.65	pounds per million Btu (MMBtu)
Annual MMBtu for heating =	2,557	(FACBTU * GSF) from criterial pollutant equation above

**Calculations:** (Emissions in tons per year)

CO <sub>2</sub> Emissions =	150
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# Musselman USARC: Summary of Estimated Annual Emissions

Please review the worksheets for Mobile Sources and Stationary Sources for detailed information on emission calculations.

## Alternative 1: Traditional disposal and Reuse

### Mobile Sources

Total Vehicle Emissions (tons per year)

Pollutant	Tons	
CO	0.87	
NOx	1.7	
ROG	0.17	
SOx	0.0026	
PM10	0.084	
PM2.5	0.072	
CH4	0.0093	
CO2	273	Metric Tons 248

### Stationary Sources

Natural gas heating Emissions (tons per year)

Pollutant	Tons	
CO	0.16	
NOx	0.37	
VOC	0.011	
SO2	0.0012	
PM10	0.015	
CO2	235	Metric Tons 213

### Total Emissions

Pollutant	Tons	
CO	1.0	
NOx	2.1	
ROG	0.18	
SOx	0.0038	
PM10	0.099	
PM2.5	0.072	
CH4	0.0093	
CO2	508	Metric Tons 461

## Musselman USARC: Summary of Estimated Annual Emissions

Please review the worksheets for Mobile Sources and Stationary Sources for detailed information on emission calculations.

### Alternative 2: Caretaker Status

#### Mobile Sources

Total Vehicle Emissions (tons per year)

Pollutant	Tons	
CO	0.028	
NOx	0.0028	
ROG	0.0029	
SOx	0.000039	
PM10	0.00033	
PM2.5	0.00021	
CH4	0.00026	
CO2	4	Metric Tons 3.6

#### Stationary Sources

Natural gas heating Emissions (tons per year)

Pollutant	Tons	
CO	0.067	
NOx	0.15	
VOC	0.0044	
SO2	0.00049	
PM10	0.0061	
CO2	96	Metric Tons 87

#### Total Emissions

Pollutant	Tons	
CO	0.095	
NOx	0.15	
ROG	0.0073	
SOx	0.00053	
PM10	0.0064	
PM2.5	0.00021	
CH4	0.00026	
CO2	100	Metric Tons 91

## Musselman USARC: Summary of Estimated Annual Emissions

Please review the worksheets for Mobile Sources and Stationary Sources for detailed information on emission calculations.

### Alternative 3: No Action Alternative

#### Mobile Sources

Total Vehicle Emissions (tons per year)

Pollutant	Tons	
CO	0.23	
NOx	0.023	
ROG	0.024	
SOx	0.00032	
PM10	0.0027	
PM2.5	0.0017	
CH4	0.0022	
CO2	33	Metric Tons 30

#### Stationary Sources

Natural gas heating Emissions (tons per year)

Pollutant	Tons	
CO	0.11	
NOx	0.24	
VOC	0.0069	
SO2	0.00077	
PM10	0.01	
CO2	150	Metric Tons 136

#### Total Emissions

Pollutant	Tons	
CO	0.34	
NOx	0.26	
ROG	0.031	
SOx	0.0011	
PM10	0.0127	
PM2.5	0.0017	
CH4	0.0022	
CO2	183	Metric Tons 166

## APPENDIX E. ECONOMIC IMPACT FORECAST SYSTEM

This appendix contains the Economic Impact Forecast System (EIFS) model output for the Proposed Action at the Musselman USARC.



### EIFS REPORT

**PROJECT NAME**  
Musselman EA

**STUDY AREA**  
42091 Montgomery, PA

**FORECAST INPUT**

Change In Local Expenditures	\$765,000	
Change In Civilian Employment	20	
Average Income of Affected Civilian	\$39,511	
Percent Expected to Relocate	0	
Change In Military Employment	0	
Average Income of Affected Military	\$39,511	
Percent of Militart Living On-post	0	

**FORECAST OUTPUT**

Employment Multiplier	3.12	
Income Multiplier	3.12	
Sales Volume - Direct	\$1,400,337	
Sales Volume - Induced	\$2,968,714	
Sales Volume - Total	\$4,369,051	0.01%
Income - Direct	\$923,335	
Income - Induced)	\$516,576	
Income - Total(place of work)	\$1,439,912	0%
Employment - Direct	25	
Employment - Induced	10	
Employment - Total	35	0.01%
Local Population	0	
Local Off-base Population	0	0%

**RTV SUMMARY**

	Sales Volume	Income	Employment	Population
<b>Positive RTV</b>	12.57 %	11.64 %	2.77 %	1.3 %
<b>Negative RTV</b>	-5.82 %	-3.7 %	-3.13 %	-0.44 %

\*\*\*\*\* End of Report \*\*\*\*\*