
FINAL

**ENVIRONMENTAL ASSESSMENT
FOR BRAC 2005
CLOSURE, DISPOSAL, AND REUSE OF THE MARSHALL
UNITED STATES ARMY RESERVE CENTER (TX053)
MARSHALL, TEXAS**



**Prepared for:
U.S. Army Reserve 63d Regional Support Command**

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August 2014

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FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT FOR
BRAC 2005
CLOSURE, DISPOSAL, AND REUSE OF THE
MARSHALL UNITED STATES ARMY RESERVE CENTER
MARSHALL, TEXAS

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended that the Department of Defense close the Marshall United States Army Reserve Center (Marshall USARC or the property) in Marshall, Texas and relocate units to a new Armed Forces Reserve Center with a field maintenance shop in Tyler, Texas. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

Pursuant to the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act of 1969 (42 U.S.C. § 4321 et seq.) and Environmental Analysis of Army Actions (32 CFR Part 651), the United States (U.S.) Army Corps of Engineers, Mobile District has prepared an Environmental Assessment (EA) for the United States Army Reserve, 63d Regional Support Command (RSC) of the potential environmental and socioeconomic effects associated with the closure, disposal, and reuse of the Marshall USARC.

The EA is incorporated in this Finding of No Significant Impact (FNSI) by reference.

PROPOSED ACTION

The proposed action is the closure and disposal of the Marshall USARC. Redevelopment and reuse of the surplus property made available by the closure of the Marshall USARC would occur as a secondary action resulting from disposal.

Under BRAC law, the Army was required to close the Marshall USARC no later than September 15, 2011. The Marshall USARC was closed, and the Army will dispose of the USARC property in as-is condition with no warranties, either express or implied, regarding the condition of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

ALTERNATIVES CONSIDERED

Alternative 1 – No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Marshall USARC at levels the same as those that occurred prior to the BRAC Commission's recommendations for closure becoming final. 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, the No Action Alternative allows comparison of impacts between the prior mission, the current caretaker status, and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

Alternative 2 – Caretaker Status

The Army secured the Marshall USARC after the military mission ended to ensure public safety and the security of remaining government property and to allow completion of any required environmental remediation actions. From the time of operational closure until conveyance the Army would place the vacant property in caretaker status. The Army, in consultation with the LRA, would determine the initial maintenance levels for the closed Marshall USARC and their duration on a facility-by-facility basis. At a minimum, these levels would ensure weather tightness for buildings, limit undue facility deterioration, and provide physical security. At the end of the initial maintenance period, the Army normally would reduce its maintenance to the minimum level for surplus government property as required by 41 CFR §§ 102-75.945 and 102-75.965, and Army Regulation 420-1 (Army Facilities Management).

Alternative 3 – Traditional Army Disposal and Educational Reuse

For Alternative 3, the Army would transfer the property via public sale. The entire property would be transferred in “as-is” condition with 3.8 acres being used for educational purposes. Development on the property is limited by 0.9 acres of regulatory floodplain. Uses of the property could include, but are not limited to, academic space, offices, training space for faculty and staff, and/or a maintenance facility. The new owner (the Grantee) would comply with federal, state, and local laws and would obtain any applicable permits or certifications, such as construction, zoning, and air quality permits.

Under this reuse alternative it is assumed the current USARC buildings are to be renovated and reused as a school and/or other institutional space, with possible demolition and new construction on the property. Based on the current total building area (approximately 5,800 SF) on the property (3.8 acres or approximately 165,528 SF) there is a 0.04 floor-area ratio (FAR), which is a low intensity level land use (BRAC 2006). For the purposes of this EA, a medium-high intensity level (0.30-0.70 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for educational use. A medium-high intensity level would be represented by an educational building footprint of approximately 25,000 to 60,000 SF plus approximately 1 acre (43,560 SF) of associated parking lot space. A 2-story building would have a total of approximately 50,000 to 120,000 SF of floor space. Up to 600 users (employees and students) of the educational building(s) could be expected at this intensity level. Periods of use for an educational facility would likely be Monday through Friday during the day, with some use in the evenings and on weekends.

Alternative 4 – Traditional Army Disposal and Commercial Reuse

For Alternative 4, the Army would transfer the property via a public sale. The entire property would be transferred in “as-is condition” with 3.8 acres being available for commercial use. Development on the property is limited by 0.9 acres of regulatory floodplain. Current zoning of the Marshall USARC property is C-3, General Business. Section 21, Permitted Uses, of the City of Marshall Zoning Code describes the uses allowed in this zoning district. C-3 General Business permitted uses include, but are not limited to, retail, banks, hotels, restaurants,

community centers, museums, amusement enterprises, theaters, child care, repair services, automobile sales and service, parking garages or lots, storage units, warehousing, or office space (local government, organizations, or private business).

Under this reuse alternative it is assumed the current USARC buildings are to be renovated and reused, with possible demolition and new construction on the property. For the purposes of this EA, a medium-high intensity level (0.30-0.70 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for commercial use. A medium-high intensity level would be represented by a commercial building footprint of approximately 25,000 to 60,000 SF plus approximately 2 acres (90,000 SF) of associated parking lot space. A 2-story building would have a total of approximately 50,000 to 120,000 SF of floor space. Up to 600 users (employees and customers) of the commercial building(s) could be expected at this intensity level. Periods of use for a commercial space would likely be throughout the week, both during the day and in the evenings.

Alternative 5 – Traditional Army Disposal and Residential Reuse

For Alternative 5, the Army would transfer the property via a public sale. The entire property would be transferred in “as-is condition” with 3.8 acres being used for residential use. Development on the property is limited by 0.9 acres of regulatory floodplain. Current zoning of the Marshall USARC property is C-3, General Business. Section 21, Permitted Uses, of the City of Marshall Zoning Code describes the uses allowed in this zoning district. C-3 General Business permitted uses include some residential development, including single family dwellings, duplexes, triplexes, quadraplexes, townhomes, and group care homes. However, construction of apartments and condominiums are not allowed in areas zoned as C-3, General Business.

Under this reuse alternative, the analysis in the EA assumes the current USARC buildings are to be demolished and residential dwellings will be constructed. For the purposes of this EA, a medium intensity level (0.10-0.30 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for residential use. A medium intensity level would be represented by residential building footprints of approximately 8,000 to 25,000 SF plus approximately 18,000 SF of associated parking lot space. A series of 2-story buildings would have a total of approximately 16,000 to 50,000 SF of residential space. There is the potential for up to approximately 30 residential units (quadraplexes) on the 3.8-acre property (City of Marshall 2012). Periods of use for a residential reuse would likely be throughout the week, both during the day and in the evenings.

FACTORS CONSIDERED IN DETERMINING THAT NO ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED

As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of each of the implementation alternatives and the No Action Alternative have been considered. The EA examined potential effects of Alternative 1 (No Action), Alternative 2 (Caretaker Status), Alternative 3 (Traditional Army Disposal and Educational Reuse), Alternative 4 (Traditional Army Disposal and Commercial Reuse), and Alternative 5 (Traditional Army Disposal and Residential Reuse) on 12 resource categories. This analysis included a detailed analysis of eight resource categories: aesthetics and visual resources, air quality, land use (current and future

development in the region of influence, installation land, and surrounding land), hazardous and toxic substances (asbestos-containing material (ACM) and lead-based paint (LBP)), noise, socioeconomics (economic development, environmental justice, housing, protection of children, and public services), transportation (roadways and traffic and public transportation), and water resources (floodplain). The detailed analyses concluded there would be no impacts to the protection of children, not significant minor impacts to aesthetics and visual resources, land use, hazardous and toxic substances, noise, environmental justice, and water resources, not significant minor to moderate impacts to transportation, and not significant moderate impacts to air quality and socioeconomics resulting from the Proposed Action alternatives.

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the transferee would assume responsibility for abatement or management of any ACM in accordance with applicable federal, state, and local requirements. Any remaining LBP would not present an unacceptable risk to human health, because the transferee 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 complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards.

PUBLIC COMMENT

Comments on the EA and FNSI were accepted during a 30-day public review period that began on August 15, 2014 and ended on September 15, 2014 in accordance with requirements specified in 32 CFR Part 651. The 30-day public review period was initiated by placing a Notice of Availability of the Final EA and Draft FNSI in the *Marshall News Messenger* and the *Longview News-Journal* on August 15, 2014. The EA and Draft FNSI were available at the Marshall Public Library (300 South Alamo Boulevard, Marshall, Texas 75670) and the Army's BRAC website at: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

During the 30-day public review period, the 63d RSC received two comments. Both the Texas State Historic Preservation Office (SHPO) and the Muscogee (Creek) Nation of Oklahoma indicated concurrence with the determination of No Historic Properties Affected.

CONCLUSION

Based on the analysis in the EA, it has been determined that implementation of any of the Proposed Action's alternatives would have no significant direct, indirect, or cumulative impacts on the quality of the natural or human environment. Because no significant environmental impacts will result from implementation of the proposed action or any of the alternatives, issuance of a Finding of No Significant Impact is warranted, and preparation of an Environmental Impact Statement is not required.


FOR THE COMMANDER

Date 26 Sep 14

Stewart R. Fearon
Colonel
Director of Public Works

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ENVIRONMENTAL ASSESSMENT
FOR BRAC 2005
CLOSURE, DISPOSAL, AND REUSE OF THE
MARSHALL UNITED STATES ARMY RESERVE CENTER
MARSHALL, TEXAS

Approved by:



Date 24 JUL 2014

FOR THE COMMANDER

Stewart R. Fearon
Colonel
Director of Public Works

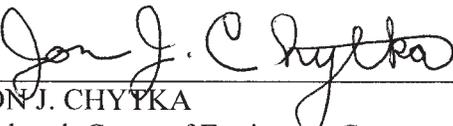
Reviewed by:

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Date 23 Jul 2014

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Prepared by:



Date 5 Aug 14

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EXECUTIVE SUMMARY

ES 1 Introduction

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the Marshall United States Army Reserve Center (Marshall USARC or the USARC property) in Marshall, Texas and relocation of its units to a new Armed Forces Reserve Center (AFRC) with a field maintenance shop in Tyler, Texas. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

This Environmental Assessment (EA) analyzes the environmental impacts of the proposed closure, disposal, and reuse of the Marshall USARC. This EA was developed in accordance with the *National Environmental Policy Act* (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. Its purpose is to inform decision makers and the public of the likely environmental and socioeconomic consequences of the Proposed Action and alternatives.

This EA addresses the potential environmental, cultural, and socioeconomic effects of the Marshall USARC closure, disposal, and reuse. The U.S. Army Corps of Engineers (USACE), Mobile District prepared separate NEPA documentation for construction and operation of the new AFRC in Tyler, Texas (USACE 2009). The 63d RSC prepared NEPA documentation for relocation of the unit to the new AFRC.

ES 2 Proposed Action

The proposed action is the disposal of surplus property made available by the realignment of the Marshall USARC. Redevelopment and reuse of the surplus Marshall USARC property would occur as a secondary action under disposal.

Under BRAC (Base Closure and Realignment) law, the Army was required to close the Marshall USARC not later than September 15, 2011. The Marshall USARC was closed and the Army will dispose of the property in as-is condition with no warranties, either express or implied, regarding the condition of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

ES 3 Alternatives Considered

ES 3.1 Alternative 1 - No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Marshall USARC at levels the same as those that occurred prior to the BRAC Commission's recommendations for closure becoming final. 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, the No Action Alternative allows comparison of impacts between the prior mission, the current caretaker status, and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

ES 3.2 Alternative 2 - Caretaker Status Alternative

The Army secured the Marshall USARC after the military mission ended to ensure public safety and the security of remaining government property and to allow completion of any required environmental remediation actions. From the time of operational closure until conveyance the Army would place the vacant property in caretaker status. The Army, in consultation with the LRA, would determine the initial maintenance levels for the closed Marshall USARC and their duration on a facility-by-facility basis. At a minimum, these levels would ensure weather tightness for buildings, limit undue facility deterioration, and provide physical security. At the end of the initial maintenance period, the Army normally would reduce 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).

ES 3.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

For Alternative 3, the Army would transfer the property via public sale. The entire property would be transferred in “as-is” condition with 3.8 acres being used for educational purposes. Development on the property is limited by 0.9 acres of regulatory floodplain. Uses of the property could include, but are not limited to, academic space, offices, training space for faculty and staff, and/or a maintenance facility. The new owner (the Grantee) would comply with federal, state, and local laws and would obtain any applicable permits or certifications, such as construction, zoning, and air quality permits.

Under this reuse alternative it is assumed the current USARC buildings are to be renovated and reused as a school and/or other institutional space, with possible demolition and new construction on the property. Based on the current total building area (approximately 5,800 square feet (SF)) on the property (3.8 acres or approximately 165,528 SF) there is a 0.04 floor-area ratio (FAR), which is a low intensity level land use (BRAC 2006). For the purposes of this EA, a medium-high intensity level (0.30-0.70 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for educational use. A medium-high intensity level would be represented by an educational building footprint of approximately 25,000 to 60,000 SF plus approximately 1 acre (43,560 SF) of associated parking lot space. A 2-story building would have a total of approximately 50,000 to 120,000 SF of floor space. Up to 600 users (employees and students) of the educational building(s) could be expected at this intensity level. Periods of use for an educational facility would likely be Monday through Friday during the day, with some use in the evenings and on weekends.

ES 3.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

For Alternative 4, the Army would transfer the property via a public sale. The entire property would be transferred in “as-is condition” with 3.8 acres being available for commercial use. Development on the property is limited by 0.9 acres of regulatory floodplain. Current zoning of the Marshall USARC property is C-3, General Business. Section 21, Permitted Uses, of the City of Marshall Zoning Code describes the uses allowed in this zoning district. C-3 General Business permitted uses include, but are not limited to, retail, banks, hotels, restaurants, community centers, museums, amusement enterprises, theaters, child care, repair services, automobile sales and service, parking garages or lots, storage units, warehousing, or office space (local government, organizations, or private business).

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ES 3.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

For Alternative 5, the Army would transfer the property via a public sale. The entire property would be transferred in “as-is condition” with 3.8 acres being used for residential use. Development on the property is limited by 0.9 acres of regulatory floodplain. Current zoning of the Marshall USARC property is C-3, General Business. Section 21, Permitted Uses, of the City of Marshall Zoning Code describes the uses allowed in this zoning district. C-3 General Business permitted uses include some residential development, including single family dwellings, duplexes, triplexes, quadraplexes, townhomes, and group care homes. However, construction of apartments and condominiums are not allowed in areas zoned as C-3, General Business.

Under this reuse alternative, the analysis in the EA assumes the current USARC buildings are to be demolished and residential dwellings will be constructed. For the purposes of this EA, a medium intensity level (0.10-0.30 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for residential use. A medium intensity level would be represented by residential building footprints of approximately 8,000 to 25,000 SF plus approximately 18,000 SF of associated parking lot space. A series of 2-story buildings would have a total of approximately 16,000 to 50,000 SF of residential space. There is the potential for up to approximately 30 residential units (quadraplexes) on the 3.8-acre property (City of Marshall 2012). Periods of use for a residential reuse would likely be throughout the week, both during the day and in the evenings.

ES 4 Environmental Consequences

Table ES-1 lists each of the environmental resource categories and subcategories and it documents which resources are present and the potential environmental consequences. The ranges of intensity of potential impacts discussed in this EA and listed in Table ES-1 are characterized as follows:

- No Impact - a resource is not present;
- No Impact - a resource is present, but is not affected;
- Negligible - the impact is not measurable at the lowest level of detection;
- Minor - the impact is slight, but detectable;
- Moderate - the impact is readily apparent and appreciable; and
- Significant - the impact is over a limit that would trigger requirements for mitigation or the preparation of an Environmental Impact Statement, as discussed at 40 CFR § 1508.27. These limits are established for each resource category.

Table ES-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
AESTHETICS AND VISUAL RESOURCES Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.1	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
AIR QUALITY Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.2	Present; no impacts Present; not significant, negligible impacts Present; not significant, moderate impacts Present; not significant, moderate impacts Present; not significant, minor impacts
BIOLOGICAL RESOURCES		
Critical Habitat	4.1.1	Not present; no impacts
Threatened and Endangered Species (State and Federal)	4.1.1	Not present; no impacts
Vegetation	4.1.3	Present; no impacts or not significant, negligible/minor impacts
Wildlife	4.1.3	Present; no impacts or not significant, negligible/minor impacts
Wilderness Areas and Wildlife Refuges	4.1.1	Not present; no impacts
CULTURAL RESOURCES		
Archaeological Resources	4.1.1	Not present; no impacts
Historic Buildings	4.1.1	Not present; no impacts
Historic Properties of Religious or Cultural Significance to Native Americans and Tribes	4.1.1	Not present; no impacts
GEOLOGY AND SOIL	4.1.3	Present; no impacts or not significant, minor impacts
HAZARDOUS AND TOXIC SUBSTANCES		
Asbestos-Containing Material Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.3	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Marshall USARC.

Resource Category (Alphabetical)	Document Section	Analysis
Lead-Based Paint Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.3	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Munitions and Explosives of Concern	4.1.1	Not present; no impacts
Past Uses and Operations	4.1.2	Present; no impacts
Polychlorinated Biphenyls	4.1.2	Present; no impacts
Radioactive Materials	4.1.1	Not present; no impacts
Radon	4.1.2	Present; no impacts
Petroleum Products, Underground Storage Tanks (USTs), Aboveground Storage Tanks (ASTs)	4.2.3	USTs not present; AST present, little or no impacts
Waste Disposal Sites	4.1.1	Not present; no impacts
LAND USE		
Current and Future Development in the Region of Influence Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.4	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Installation Land/Airspace Use Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.4	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
National and State Parks	4.1.1	Not present; no impacts
Prime and Unique Farmland	4.1.1	Not present; no impacts
Surrounding Land Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.4	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
NOISE Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.5	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, negligible/minor impacts
SOCIOECONOMICS		
Demographics	4.1.3	Present; not significant, negligible/minor impacts
Economic Development Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, moderate impacts Present; not significant, moderate impacts
Environmental Justice Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible to minor impacts Present; not significant, negligible to minor impacts Present; not significant, minor impacts
Housing Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse	4.2.6	Present; no impacts Present; no impacts Present; no impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse		Present; no impacts Present; not significant, negligible impacts
Protection of Children Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; no impacts Present; no impacts Present; no impacts Present; no impacts
Public Services Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible to minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
TRANSPORTATION		
Roadways and Traffic Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts Present; not significant, negligible to minor impacts
Public Transportation Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, negligible impacts Present; not significant, negligible impacts Present; not significant, negligible impacts
UTILITIES		
Communications	4.1.3	Present; not significant, negligible impacts
Energy Sources (Electrical, Gas, etc)	4.1.3	Present; not significant, negligible impacts
Potable Water Supply	4.1.3	Present; not significant, negligible impacts

Table ES-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Solid Waste	4.1.3	Present; not significant, negligible impacts
Wastewater/Storm Water System	4.1.3	Present; not significant, negligible impacts
WATER RESOURCES		
Floodplains/Coastal Barriers and Zones Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.8	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Hydrology/Groundwater	4.1.3	Present; not significant, negligible/minor impacts
National Wild and Scenic Rivers	4.1.1	Not present; no impacts
Surface Water (Streams, Ponds, etc.)	4.1.3	Present on adjacent/nearby property; not significant, negligible/minor impacts
Wetlands	4.1.1	Not present; no impacts

ES 5 Conclusions

This EA was conducted in accordance with the requirements of NEPA, the Council on Environmental Quality regulations implementing NEPA (40 CFR Part 1500), and Environmental Analysis of Army Actions (32 CFR Part 651). As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the each of the implementation alternatives and the No Action Alternative have been considered.

The EA performed an analysis of 12 resource categories including a detailed analysis of eight resource categories: aesthetics and visual resources, air quality, hazardous and toxic substances (asbestos-containing material and lead-based paint), land use (current and future development in the region of influence, installation land, and surrounding land), noise, socioeconomics (economic development, environmental justice, housing, protection of children, and public services), transportation (roadways and traffic and public transportation), and water resources (floodplains). The analyses in the EA concluded there would be no significant adverse or significant beneficial environmental impacts resulting from any of the Proposed Action alternatives. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted, and preparation of an Environmental Impact Statement (EIS) is not required.

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SECTION 1.0 INTRODUCTION

This Environmental Assessment (EA) analyzes the potential environmental impacts of the proposed action of closure, disposal, and reuse of the Marshall United States Army Reserve Center (USARC). The facility is located at 1209 Pinecrest Drive East, Marshall, Harrison County, Texas (Figure 1-1). This EA was developed in accordance with the National Environmental Policy Act (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. The purpose of the EA is to inform decision makers and the public of the likely environmental and socioeconomic consequences of the Proposed Action and its reuse alternatives.

1.1 Purpose and Need of the Proposed Action

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the Marshall USARC (Figure 1-2) and realignment of its essential missions to other installations. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

1.2 Public Involvement

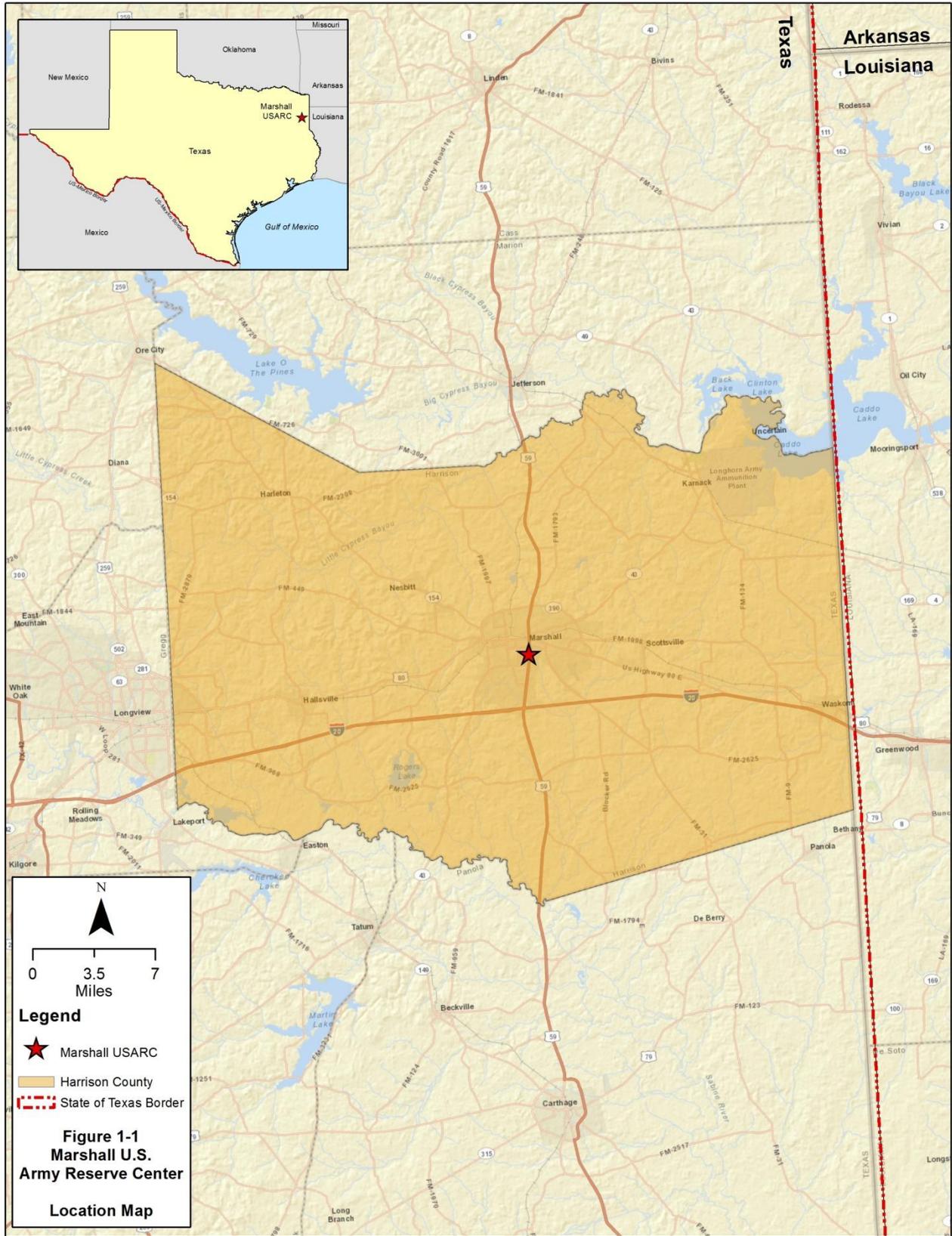
The Army is committed to open decision making. The collaborative involvement of other agencies, organizations, and individuals in the NEPA process enhances issue identification and problem solving. In preparing this EA, the Army consulted or coordinated with relevant United States (U.S.), state, and tribal entities including the U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), U.S. Department of the Interior, Texas Commission on Environmental Quality, Texas Historical Commission (THC), federally recognized Native American tribes, and others as appropriate.

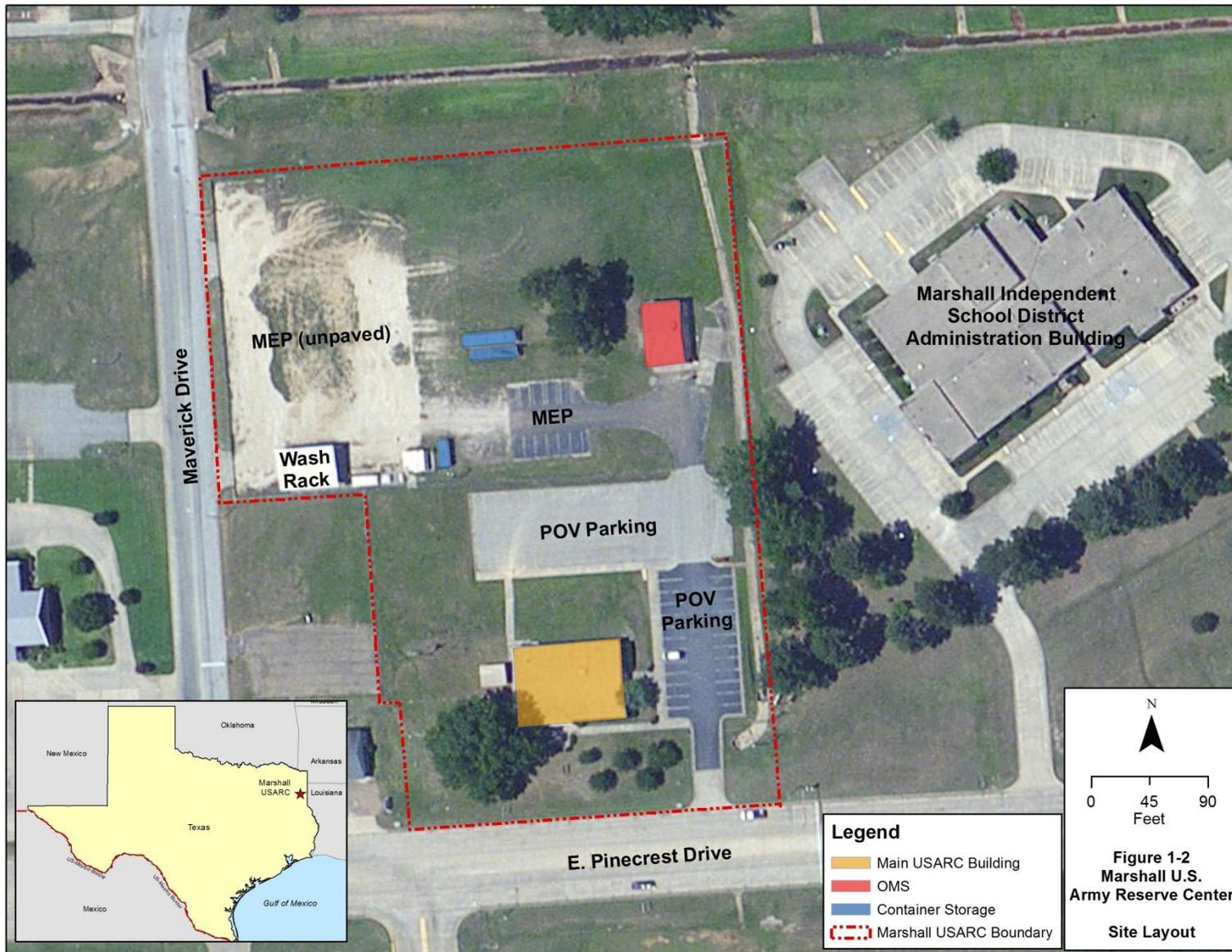
The 30-day public review period begins by publishing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in a local newspaper, the *Marshall News Messenger*, and the *Longview News-Journal*, Longview, Texas. The EA and draft FNSI are made available during the public review period at the Marshall Public Library (300 South Alamo Boulevard, Marshall, Texas 75670), and on the BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

The Army invites the public and all interested and affected parties to review and comment on this EA and the draft FNSI. Written comments and requests for information should be submitted to the NEPA Coordinator of the 63d Regional Support Command (RSC), Carmen Call, P.O. Box 63, Moffett Field, California 94035-0063 or carmen.a.call.civ@mail.mil.

At the end of the public review period, the Army will review all comments received; compare environmental impacts associated with reasonable alternatives; revise the FNSI or the EA, if necessary; supplement the EA, if needed; and make a decision. If impacts are found to be not significant, the Army will sign the FNSI and can proceed with the proposed action. If potential impacts are found to be significant, the Army can decide to (1) not proceed with the proposed action, (2) proceed with the proposed action after committing in the revised Final FNSI to

mitigation reducing the anticipated impact to a less than significant impact, or (3) publish a Notice of Intent to prepare an Environmental Impact Statement (EIS) in the Federal Register.





SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION

The proposed action is the disposal of surplus property made available by the realignment of the Marshall USARC. Redevelopment and reuse of the surplus Marshall USARC property (the property) would occur as a secondary action under disposal.

Under BRAC law, the Army was required to close the Marshall USARC not later than August 3, 2011. The Marshall USARC was closed and the Army will dispose of the property in “as-is condition,” with no warranties, either express or implied, regarding the condition of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose (BRAC 2011).

2.1 BRAC Commission’s Recommendation

*“Close the United States Army Reserve Center, Tyler, TX, and the **United States Army Reserve Center, Marshall, TX, and relocate units to a new Armed Forces Reserve Center with a Field Maintenance Shop in Tyler, TX, if the Army is able to acquire suitable land for the construction of the facilities. The new AFRC shall have the capability to accommodate Texas National Guard Units from the following Texas ARNG Readiness Centers: Athens, Tyler, Henderson, Kilgore, Marshall, and Corsicana, TX, and the Field Maintenance Shop in Marshall, TX, if the state decides to relocate those National Guard units”** (BRAC 2011).*

The former occupant of the Marshall USARC, the 721st Engineer Company, has relocated to a new Armed Forces Reserve Center (AFRC) in Tyler, Texas. The U.S. Army Corps of Engineers, (USACE), Mobile District prepared the NEPA documentation for construction and operation of the new AFRC (USACE 2009). The 63d RSC prepared NEPA documentation for relocation of the unit to the new AFRC.

2.2 Local Redevelopment Authority’s Reuse Plan

The Marshall, Texas Local Redevelopment Authority (LRA) was officially recognized by the U.S. Office of Economic Adjustment as the planning entity for the purpose of formulating a recommendation for the reuse of the Marshall USARC. On May 31, 2006, the Department of Defense published recognition of the LRA in the Federal Register. In accordance with provisions in 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 (NOIs) from state and local governments, representatives of the homeless, and other interested parties. The LRA published a request for NOIs in the Marshall News Messenger on October 1, 2006. The deadline for receiving NOIs was January 3, 2006. On November 3, 2006, the LRA held a workshop and site tour of the Marshall USARC to provide the public and organizations the opportunity to become familiar with the property and to inquire about the NOI process (LRA 2007).

In the LRA’s original reuse plan for the Marshall USARC property, two NOIs were considered. The Marshall Independent School District proposed using the property for academic space, offices, training space for faculty and staff, and/or as a maintenance facility, and the Marshall-Harrison County Veterans Association (VA) proposed using the property for a Veterans Center

that would include a museum, a ceremonial area, and an area for gatherings and activities. The VA's reuse proposal was determined by the LRA to be more compatible with the City's General Plan than a reuse by the School District. However, the original reuse plan is no longer valid because the VA did not have the funds to purchase the property via negotiated sale (LRA 2010a).

After the VA wasn't able to acquire the property, the City of Marshall attempted to purchase it for a historic center via negotiated sale. However, after 2 years the city could not generate the funds to meet the Army's appraised value of the property. The LRA then sought a Public Benefit Conveyance (PBC) for a U.S. Department of Education (DoED) conveyance, but the DoEd did not approve a sponsorship for the LRA's stated purpose. The LRA also considered a proposal for a National Park Service (NPS) PBC of the property. However, in October 2013, the BRAC Division decided to convey the property via public sale because of the extreme length of time the LRA was taking to organize a conveyance method.

On February 13, 2014 Parsons personnel met with City of Marshall Mayor Ed Smith and Acting City Manager Buzz Snyder to help determine possible reuses for the Marshall USARC property. At the meeting Parsons obtained a copy of the City of Marshall General Plan and the City of Marshall zoning regulations. City officials expressed that residential reuse was unlikely; however, it is a permitted use within the zoning district. They also stated that the VA and the Marshall Independent School District are still very interested in obtaining the property and both organizations would consider purchasing it if they could procure the funds. During the February 13, 2014 meeting, the Mayor indicated a preference for the VA proposal over the School District proposal.

2.3 Description of the Marshall USARC

The property is located at 1209 Pinecrest Drive East, in Marshall, Texas. The U.S. Government acquired the 3.78-acre property from Roger and Mary Magers on August 12, 1958, and the Marshall USARC was constructed in 1959 (USACE 2007).

Figure 1-2 shows the Marshall USARC site layout. The USARC contains two permanent structures and two parking lots including a military equipment parking (MEP) area and a paved privately owned vehicle (POV) parking area. The two permanent structures comprise a 4,472-square-foot (SF) main administrative building and a 1,328-SF organizational maintenance shop (OMS) that is currently inactive. The main building and OMS walls are concrete block with brick veneer.

The main building is a rectangular, single-story structure. The building's interior consists of office space, classrooms, a kitchen area, storage, and a mechanical room. The OMS building is a one-bay, one-story maintenance shop used primarily for vehicle maintenance and storage. Other improvements on the property include a vehicle wash rack (VWR) with associated oil-water separator (OWS) system, and a picnic/break area shelter. Also located on the property were three steel mobile shipping containers (CONEX) used to store field equipment (USAR 2012a). Two portable steel sheds on the property that had been used for petroleum, oil and lubricants (POL) and hazardous materials storage had been removed before a February 13, 2014 site visit (Parsons 2014).

The perimeter of the OMS and MEP area is secured by a chain-link fence along Mustang Drive, with two vehicle access gates located on the west side. There are pedestrian and vehicle access gates that both open into the POV parking lot located on the south side. Approximately one-

third of the property is impervious (asphalt parking areas, driveways, concrete walkways, buildings, etc.), while the remainder is covered by lawn except for the northern portion of the MEP area that is gravel. The property is bordered to the south by Pinecrest Drive East and to the west by Mustang Drive. A concrete-lined drainage feature known as Turtle Creek runs along the northern border of the property. Topographically, the property is relatively flat with a gentle slope down to the north. No signs of erosion, excavation, or fill were observed on the property.

According to the records review of the 2007 Environmental Condition of Property (ECP) Report, the Army removed a VWR and associated OWS in 1999. The removed VWR and OWS were located near the OMS. The current vehicle wash area consisting of a covered concrete pad is located west of the OMS building in the fenced MEP area (USACE 2007).

The Marshall USARC was most recently occupied by the 721st Engineer Company. The USARC previously consisted of 1 full time staff and approximately 42 reservists that trained at the USARC one weekend per month.



Photograph 1. Marshall USARC, front entrance, view facing north.



Photograph 2. Marshall USARC, side entrance, view facing southwest.



Photograph 3. Marshall USARC, OMS, view facing northeast.



Photograph 4. Marshall USARC, MEP area and CONEXs, view facing north.



Photograph 5. Marshall USARC, vehicle wash rack and oil-water separator system, view facing south.



Photograph 6. Marshall USARC, main building, rear view, view facing south.

SECTION 3.0 ALTERNATIVES

3.1 Non-Disposal Alternatives

3.1.1 Alternative 1 – No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Marshall USARC at levels the same as those that occurred prior to the BRAC Commission’s recommendations for closure becoming final. 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, the No Action Alternative allows comparison of impacts between the prior mission, the current caretaker status, and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

3.1.2 Alternative 2 – Caretaker Status Alternative

The Army secured the Marshall USARC after the military mission ended to ensure public safety and the security of remaining government property and to allow completion of any required environmental remediation actions. From the time of operational closure until conveyance the Army would place the vacant property in caretaker status. The Army, in consultation with the LRA, would determine the initial maintenance levels for the closed Marshall USARC and their duration on a facility-by-facility basis. At a minimum, these levels would ensure weather tightness for buildings, limit undue facility deterioration, and provide physical security. At the end of the initial maintenance period, the Army normally would reduce 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).

3.2 Preferred Alternative: Traditional Army Disposal and Reuse

The primary action is the disposal of excess property by the Army. The secondary action is reuse of the property by the transferee.

Zoning restrictions can play a role in determining the type of reuse that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Marshall USARC property is in an area that is zoned by the City of Marshall as C-3, General Business District. This zoning designation prohibits industrial use and housing consisting of more than four connected units but allows for a wide variety of retail, restaurant, office, transportation, institutional, medical, and other residential uses. In addition, development on the Marshall USARC property is limited by approximately 0.9 acres of regulatory floodplain present on the north portion of the property (see Subsection 4.2.8 Water Resources). The following three alternatives offer a reasonable range of the possible reuses following public sale of the Marshall USARC property.

3.2.1 Alternative 3 – Traditional Army Disposal and Educational Reuse

For Alternative 3, the Army would transfer the property via public sale. The entire property would be transferred in “as-is” condition with 3.8 acres being used for educational purposes. Development on the property is limited by 0.9 acres of regulatory floodplain. Uses of the property could include, but are not limited to, academic space, offices, training space for faculty

and staff, and/or a maintenance facility. The new owner (the Grantee) would comply with federal, state, and local laws and would obtain any applicable permits or certifications, such as construction, zoning, and air quality permits.

Under this reuse alternative it is assumed the current USARC buildings are to be renovated and reused as a school and/or other institutional space, with possible demolition and new construction on the property. Based on the current total building area (approximately 5,800 SF) on the property (3.8 acres or approximately 165,528 SF) there is a 0.04 floor-area ratio (FAR), which is a low intensity level land use (BRAC 2006). For the purposes of this EA, a medium-high intensity level (0.30-0.70 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for educational use. A medium-high intensity level would be represented by an educational building footprint of approximately 25,000 to 60,000 SF plus approximately 1 acre (43,560 SF) of associated parking lot space. A 2-story building would have a total of approximately 50,000 to 120,000 SF of floor space. Up to 600 users (employees and students) of the educational building(s) could be expected at this intensity level. Periods of use for an educational facility would likely be Monday through Friday during the day, with some use in the evenings and on weekends.

3.2.2 Alternative 4 – Traditional Army Disposal and Commercial Reuse

For Alternative 4, the Army would transfer the property via a public sale. The entire property would be transferred in “as-is condition” with 3.8 acres being available for commercial use. Development on the property is limited by 0.9 acres of regulatory floodplain. Current zoning of the Marshall USARC property is C-3, General Business. Section 21, Permitted Uses, of the City of Marshall Zoning Code describes the uses allowed in this zoning district. C-3 General Business permitted uses include, but are not limited to, retail, banks, hotels, restaurants, community centers, museums, amusement enterprises, theaters, child care, repair services, automobile sales and service, parking garages or lots, storage units, warehousing, or office space (local government, organizations, or private business).

Under this reuse alternative it is assumed the current USARC buildings are to be renovated and reused, with possible demolition and new construction on the property. For the purposes of this EA, a medium-high intensity level (0.30-0.70 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for commercial use. A medium-high intensity level would be represented by a commercial building footprint of approximately 25,000 to 60,000 SF plus approximately 2 acres (90,000 SF) of associated parking lot space. A 2-story building would have a total of approximately 50,000 to 120,000 SF of floor space. Up to 600 users (employees and customers) of the commercial building(s) could be expected at this intensity level. Periods of use for a commercial space would likely be throughout the week, both during the day and in the evenings.

3.2.3 Alternative 5 – Traditional Army Disposal and Residential Reuse

For Alternative 5, the Army would transfer the property via a public sale. The entire property would be transferred in “as-is condition” with 3.8 acres being used for residential use. Development on the property is limited by 0.9 acres of regulatory floodplain. Current zoning of the Marshall USARC property is C-3, General Business. Section 21, Permitted Uses, of the City of Marshall Zoning Code describes the uses allowed in this zoning district. C-3 General Business permitted uses include some residential development, including single family dwellings, duplexes, triplexes, quadraplexes, townhomes, and group care homes. However,

construction of apartments and condominiums are not allowed in areas zoned as C-3, General Business.

Under this reuse alternative, the analysis in the EA assumes the current USARC buildings are to be demolished and residential dwellings will be constructed. For the purposes of this EA, a medium intensity level (0.10-0.30 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for residential use. A medium intensity level would be represented by residential building footprints of approximately 8,000 to 25,000 SF plus approximately 18,000 SF of associated parking lot space. A series of 2-story buildings would have a total of approximately 16,000 to 50,000 SF of residential space. There is the potential for up to approximately 30 residential units (quadraplexes) on the 3.8-acre property (City of Marshall 2012). Periods of use for a residential reuse would likely be throughout the week, both during the day and in the evenings.

3.3 Alternatives Considered and Eliminated From Further Analysis

3.3.1 Early Transfer and Reuse

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. 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. This alternative was not carried forward for further analysis, because no remedial action is required.

3.3.2 Other Reuse Options

The LRA screened this federal government surplus property by soliciting NOIs 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 Redevelopment and Homeless Assistance Act of 1994. In response to the November 3, 2006 newspaper notice, two local organizations had expressed interest in the property. One organization was a group of military service veterans from Harrison County interested in developing a Veterans Center and museum and the other was the Marshall Independent School District interested in reuse as a school, administrative offices, and/or a maintenance facility. These two alternatives were not carried forward for individual analysis, because they were not selected by the LRA. However, the environmental impacts of the proposed reuses by the Marshall Independent School District and the Marshall-Harrison County VA for academic space, gatherings, and/or a museum would be similar to and consistent with the environmental impacts discussed under Alternative 3, Traditional Disposal and Educational Reuse. The environmental impacts of the proposed reuse by the Marshall Independent School District for administrative offices and/or vehicle storage and maintenance would be similar to and consistent with the environmental impacts discussed under Alternative 4, Traditional Disposal and Commercial Reuse.

In 2010, two homeless assistance organizations provided NOIs to use the property for homeless centers: My Friend's House and Bridge of Compassion. The LRA determined the presence of a facility that would serve the homeless adjacent to a school campus was not a compatible or desirable combination of land uses (LRA 2010b).

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SECTION 4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

The affected environment is a description of the existing environment potentially affected by the proposed action (40 CFR §1502.15). This section analyzes the significance of direct, indirect, and cumulative impacts of the proposed action and alternatives on the affected environment.

Impact

An environmental consequence or impact (referred to in this document as an impact) is defined as a noticeable change in a resource from the existing environmental baseline conditions caused by or resulting from the proposed action. As noted in Section 3, the baseline is the operations level at the Marshall USARC and existing environment present immediately prior to the BRAC Commission's recommendations for closure becoming final. The terms "impact" and "effect" are synonymous as used in this EA. Impacts may be determined to be beneficial or adverse and may apply to the full range of natural, aesthetic, cultural, and economic resources of the installation and its surrounding environment.

Direct Versus Indirect Impacts

Where applicable, analysis of impacts associated with each course of action has been further divided into direct and indirect impacts. Definitions and examples of direct and indirect impacts as used in this document are as follows:

- **Direct Impacts.** Direct impacts are caused by the action and occur at the same time and place. Both short- and long-term direct impacts can be applicable.
- **Indirect Impacts.** Indirect impacts are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.
- **Application of Direct Versus Indirect Impacts.** For direct impacts to occur, a resource must be present in a particular area. For example, if highly erodible soil were disturbed due to construction, there would be a direct impact to soil from erosion at the development site. Sediment-laden runoff might indirectly affect surface water quality in adjacent areas downstream from the development site.

Indirect impacts are described for the resource category in which indirect impacts are anticipated to occur. For those resource categories with no anticipated indirect impacts, no further discussion on indirect impacts will be included in the Consequences sections.

Long-Term versus Short-Term Impacts

Impacts to resources may occur in a relatively short period of time or may be permanent. In this EA, the estimated time durations during which impacts may be perceived or measured are described as short- or long-term.

Short-term impacts are generally realized just after or as a result of implementation of the alternative. Short-term impacts may result from preparation of the site for construction, actual construction, and renovation of existing facilities. Some resources may exhibit short-term impacts as they recover from any disturbances.

Long-term impacts are realized later in time after implementation of the alternative. The longer duration may be resource specific (e.g., soil impacts from increased impervious surfaces) or may be a result of the persistence of the cause of the impact (e.g., increased traffic during weekdays without traffic calming measures).

Significance

The term “significant,” as defined in the CEQ Regulations for Implementing NEPA, 40 CFR 1500, requires consideration of both the context and intensity of the impact evaluated.

Context Significance can vary in relation to the context of the action. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend on the effects in the locale rather than in the world as a whole. Both short- and long-term effects may be relevant.

Intensity In accordance with the CEQ implementing regulations, impacts are also evaluated in terms of their intensity or severity. Factors contributing to the evaluation of the intensity of an impact are listed in the CEQ regulations, 40 CFR § 1508.27(b).

The ranges of intensity of potential impacts discussed in this EA are characterized as follows:

- No Impact - a resource is not present;
- No Impact - a resource is present, but is not affected;
- Negligible - the impact is not measurable at the lowest level of detection;
- Minor - the impact is slight, but detectable;
- Moderate - the impact is readily apparent and appreciable; and
- Significant - the impact is over a limit that would trigger requirements for mitigation or the preparation of an Environmental Impact Statement, as discussed at 40 CFR 1508.27. These limits are established for each resource category.

Resource Categories Analyzed

Twelve resource areas were considered for potential impacts resulting from the Proposed Action alternatives including aesthetics and visual resources, air quality, biological resources, cultural resources, geology and soils, hazardous and toxic substances, land use, noise, socioeconomics, transportation, utilities, and water resources. Some resources were eliminated from detailed analysis as described below. Table 4-1 lists each of the environmental resource categories and subcategories, documents which resources are present and the environmental consequences, and references the document section containing each discussion.

As noted in the following analysis, none of the potential impacts identified in this EA are significant.

Table 4-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
AESTHETICS AND VISUAL RESOURCES Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.1	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
AIR QUALITY Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.2	Present; no impacts Present; not significant, negligible impacts Present; not significant, moderate impacts Present; not significant, moderate impacts Present; not significant, minor impacts
BIOLOGICAL RESOURCES		
Critical Habitat	4.1.1	Not present; no impacts
Threatened and Endangered Species (State and Federal)	4.1.1	Not present; no impacts
Vegetation	4.1.3	Present; no impacts or not significant, negligible/minor impacts
Wildlife	4.1.3	Present; no impacts or not significant, negligible/minor impacts
Wilderness Areas and Wildlife Refuges	4.1.1	Not present; no impacts
CULTURAL RESOURCES		
Archaeological Resources	4.1.1	Not present; no impacts
Historic Buildings	4.1.1	Not present; no impacts
Historic Properties of Religious or Cultural Significance to Native Americans and Tribes	4.1.1	Not present; no impacts
GEOLOGY AND SOIL	4.1.3	Present; no impacts or not significant, minor impacts
HAZARDOUS AND TOXIC SUBSTANCES		
Asbestos-Containing Material Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.3	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Lead-Based Paint Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.3	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Munitions and Explosives of Concern	4.1.1	Not present; no impacts
Past Uses and Operations	4.1.2	Present; no impacts
Polychlorinated Biphenyls	4.1.2	Present; no impacts
Radioactive Materials	4.1.1	Not present; no impacts
Radon	4.1.2	Present; no impacts
Petroleum Products, Underground Storage Tanks (USTs), Aboveground Storage Tanks (ASTs)	4.2.3	USTs not present, AST present, little or no impacts
Waste Disposal Sites	4.1.1	Not present; no impacts
LAND USE		
Current and Future Development in the Region of Influence Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.4	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Installation Land/Airspace Use Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.4	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
National and State Parks	4.1.1	Not present; no impacts
Prime and Unique Farmland	4.1.1	Not present; no impacts
Surrounding Land Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.4	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
NOISE Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.5	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, negligible to minor impacts
SOCIOECONOMICS		
Demographics	4.1.3	Present; not significant, negligible/minor impacts
Economic Development Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, moderate impacts Present; not significant, moderate impacts
Environmental Justice Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible to minor impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse		Present; not significant, negligible to minor impacts Present; not significant, minor impacts
Housing Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; no impacts Present; no impacts Present; no impacts Present; not significant, negligible impacts
Protection of Children Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; no impacts Present; no impacts Present; no impacts Present; no impacts
Public Services Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.6	Present; no impacts Present; no impacts Present; not significant, negligible to minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
TRANSPORTATION		
Roadways and Traffic Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, minor to moderate impacts Present; not significant, minor to moderate impacts Present; not significant, negligible to minor impacts
Public Transportation Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and	4.2.7	Present; no impacts Present; not significant, negligible impacts Present; not significant, negligible impacts Present; not significant, negligible impacts

Table 4-1 Summary of Resource Category Impact Analysis for the Marshall USARC.		
Resource Category (Alphabetical)	Document Section	Analysis
Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse		Present; not significant, negligible impacts
UTILITIES		
Communications	4.1.3	Present; not significant, negligible impacts
Energy Sources (Electrical, Gas, etc)	4.1.3	Present; not significant, negligible impacts
Potable Water Supply	4.1.3	Present; not significant, negligible impacts
Solid Waste	4.1.3	Present; not significant, negligible impacts
Wastewater/Storm Water System	4.1.3	Present; not significant, negligible impacts
WATER RESOURCES		
Floodplains/Coastal Barriers and Zones Alternative 1 – No Action Alternative Alternative 2 – Caretaker Status Alternative 3 – Traditional Army Disposal and Educational Reuse Alternative 4 – Traditional Army Disposal and Commercial Reuse Alternative 5 – Traditional Army Disposal and Residential Reuse	4.2.8	Present; no impacts Present; no impacts Present; not significant, minor impacts Present; not significant, minor impacts Present; not significant, minor impacts
Hydrology/Groundwater	4.1.3	Present; not significant, negligible/minor impacts
National Wild and Scenic Rivers	4.1.1	Not present; no impacts
Surface Water (Streams, Ponds, etc.)	4.1.3	Present on adjacent/nearby property; not significant, negligible/minor impacts
Wetlands	4.1.1	Not present; no impacts

4.1 Environmental Resources Eliminated from Further Considerations

Army NEPA Regulations (32 CFR § 651.14) state the NEPA analysis should reduce or eliminate discussion of minor issues to help focus analysis. This approach minimizes unnecessary analysis and discussion during the NEPA process. 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 process.

Resource categories with more than one component (e.g., Hazardous and Toxic Substances), may have certain subcategories that can be deemphasized due to insignificance and other subcategories that should be analyzed in more detail. These resource categories will, therefore, be discussed in multiple subsections throughout Section 4.

4.1.1 Environmental Resource Categories That Are Not Present

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

- **Critical Habitat** – The property is in an urban setting, is disturbed, and approximately one-third of the property is covered by impervious features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass and gravel and therefore lacks natural habitat. The 63d RSC letter to the USFWS dated July 18, 2011 documented that the USFWS has not designated critical habitat on or in the vicinity of the property (Appendix A).
- **Threatened and Endangered Species (State and Federal)** – No listed species are known to be present on the property, nor is there suitable habitat for any of the federally proposed or candidate species listed for Harrison County. The 63d RSC sent a coordination letter dated July 18, 2011 to the USFWS and a coordination letter dated April 15, 2014 to the Texas Parks and Wildlife Commission (Appendix A). These agencies did not respond with concerns for listed species.
- **Wilderness Areas and Wildlife Refuges** – The nearest national wilderness areas are the Turkey Hill Wilderness and the Big Slough Wilderness, which are located approximately 82 and 85 miles from the property, respectively. The nearest national wildlife refuges (NWR) are the Caddo Lake NWR and Red River NWR, which are located approximately 15 and 40 miles from the property, respectively. Because of their distance from the property, these resources would not be affected by the proposed action.
- **Archaeological Resources** – No archaeological sites are known to occur on the Marshall USARC property. The 63D RSC had previously determined that the archaeological potential of the Marshall USARC was low based on an archaeological assessment of Army Reserve properties conducted in June 1997 (Appendix A). It is unlikely that any archaeological sites remain on the facility and no archaeological survey is recommended for the Marshall USARC. The Texas State Historic Preservation Office (SHPO) concurred with this recommendation in a letter dated July 15, 1997 (Appendix A). However, should artifacts or archaeological features be encountered during construction activities, work would cease and the Texas SHPO and appropriate Tribes would be consulted immediately.
- **Historic Buildings** – The Marshall USARC was constructed in 1959 and contains two permanent structures: a main administration building and an OMS building. The 63d RSC determined that the Marshall USARC is not eligible for the National Register of Historic Places (NRHP) based on an architectural survey and evaluation conducted in 2011 and that no historic properties would be affected by the proposed closure, disposal, and reuse of the property. The Texas SHPO concurred with the determination in a letter dated May 4, 2011 (Appendix A).
- **Historic Properties of Religious or Cultural Significance to Native Americans and Tribes** – No properties of religious or cultural significance to the Caddo Nation, the Choctaw Nation of Oklahoma, the Muscogee (Creek) Nation of Oklahoma, the Osage

Nation, or the Tonkawa Tribe of Indians of Oklahoma have been identified through consultation. Native American coordination is presented in Appendix A.

- **Munitions and Explosives of Concern** – There was no evidence found during the ECP site reconnaissance or from USAR personnel interviews of the past presence of munitions and explosives of concern on the Marshall USARC property (USACE 2007).
- **Radioactive Materials** – It should be assumed that some low level radiological materials associated with the illumination of various types of military equipment, e.g., weapon sights, compasses, aiming circles, etc., could have been stored or used on site. However, the Radiological Site Assessment found no evidence to suggest that any radiological commodities were improperly managed on the property, or that any radiological material was released (USACE 2007). The Marshall USARC Radiological Site Assessment report was completed in December 2011 (U.S. Army 2011). The report provides an evaluation of radiological materials used and the summary of findings and results. The report concluded that no further action is required with respect to radiological devices or materials identified. The USARC buildings are suitable for unrestricted use.
- **Waste Disposal Sites** – The Marshall USARC is a Resource Conservation and Recovery Act (RCRA) conditionally exempt small quantity generator (CESQG). CESQGs are defined as facilities generating less than 100 kilograms (kg) of hazardous waste, or less than 1 kg of acutely hazardous waste per month. No violations were reported for the property. There are no waste disposal sites on the property, and waste disposal activities on the property were conducted in accordance with local, state, and federal regulations. In addition, the Grantee would properly dispose of waste generated from the reuse, including demolition and construction waste, in accordance with local, state, and federal regulations.
- **National and State Parks** – The property does not contain and is not near any national or state parks. The nearest national parks are the President William Jefferson Clinton Birthplace Home National Historic Site and the Cane River Creole National Historical Park, which are located approximately 88 and 100 miles from the property, respectively. The nearest state parks are Caddo Lake State Park and Martin Creek Lake State Park, which are located approximately 15 and 20 miles from the property, respectively.
- **Prime and Unique Farmland** – The property is not prime or unique farmland as defined by 7 CFR § 658.2(a), because the definition of farmland does not include land already in or committed to urban development.
- **National Wild and Scenic Rivers** – The nearest National Wild and Scenic Rivers to the Marshall USARC are the Saline Bayou in Louisiana and the Cossatot River in Arkansas, which are approximately 95 and 120 miles from the property, respectively. Because of their distance from the property, these resources would not be affected by the proposed action.
- **Wetlands** – The site reconnaissance revealed that no wetlands are present on the USARC property. Wetland indicators including wetland vegetation, hydric soils, or wetland hydrology were not observed on the property.

4.1.2 Environmental Resources that are Present, but Not Impacted

None of the alternatives would have significant direct, indirect, or cumulative impacts on the following subcategories of the environmental categories, because proposed demolition or new construction activities would not alter or affect these resources:

- **Past Uses and Operations (Hazardous and Toxic Substances)** – The property is classified as an ECP category Type 2, an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred (USACE 2007; USAR 2012a). This classification is based on a petroleum release of approximately 15 gallons of diesel fuel and hydraulic fluid that occurred in the MEP area on December 1, 2005. The spill occurred when a crane rolled over during loading/unloading activities on the north side of the driveway connecting the OMS to the VWR. In response to the spill, fluids were drained from the overturned crane to stop the leak, and stained soil was manually excavated. No other releases of hazardous substances or petroleum products have been identified. No stained soil or stressed vegetation was observed on the property during the February 2014 site visit. Because no remedial action is required, past uses and operations on the property regarding hazardous and toxic substance would have no direct, indirect, or cumulative impacts on the implementation of the alternatives.

Historically, the property primarily functioned as an administrative, storage, and maintenance facility, including vehicle washing. The USARC was also used by reservists for drill activities on various weekends throughout the year. The OMS was used to perform routine vehicle maintenance including checking and changing fluids, replacement of brakes, and tune ups.

Vehicle washing activities occurred at a covered VWR located in the southwest corner of the fenced MEP area. The VWR discharges to the city sanitary sewer system.

- **Polychlorinated Biphenyls** – There would be no direct, indirect, or cumulative impacts from the presence of polychlorinated biphenyls (PCBs) on the implementation of the alternatives because the only suspected PCB-containing equipment on the property are three pole-mounted transformers that would be managed by the Southwestern Electric Power Company (SWEPCO) in accordance with applicable local, state, and federal regulations (USACE 2007). At the time of the 2014 site visit, one of the transformers appeared to be recently replaced and in new condition. The other transformers were in fair condition with surface rust and no sign of visible leaks. The older transformers were manufactured by Central Malone in 1958 and have not been tested for PCB content (U.S. Army Center for Health Promotion and Preventive Medicine 1997). PCBs may be contained in light ballasts in older type fluorescent light fixtures. According to a PCB assessment report conducted in 1997, none of the fluorescent lighting fixtures observed in the facility were operated by PCB-containing ballasts (U.S. Army Center for Health Promotion and Preventive Medicine 1997). At the time of the ECP site reconnaissance visit, the ballasts appeared to be in good condition and no leaking dielectric fluid was observed (USACE 2007). As such, they are in compliance with federal and state regulations and have not negatively affected environmental conditions on the property. If any ballasts that are not marked “No

PCBs” are encountered and begin to leak or are removed from service, then they should be assumed to contain PCBs.

- **Radon** – There would be no direct, indirect, or cumulative impacts from the presence of radon on the implementation of the alternatives because radon levels found at the Mann USARC were below the USEPA accepted action level of 4.0 picocuries per liter (USACE 2007).

4.1.3 Environmental Resources are Present, but Not Significant, Negligible/Minor Environmental Impacts

The resources discussed below are present at the Marshall USARC and impacts may occur to these resources as a result of implementing the proposed action. Because these impacts would have little to no measureable environmental effect on the resource, the impacts will not be discussed in detail.

- **Vegetation** – The No Action Alternative would have no impact on the vegetation present at the Marshall USARC. The action alternatives would have negligible to minor direct, indirect, or cumulative impacts on the vegetation present at the Marshall USARC because the USARC is developed and urbanized. Over one-third of the property is covered by impervious features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass and gravel.
- **Wildlife** – The No Action Alternative would have no impact on the vegetation present at the Marshall USARC. The action alternatives would have negligible to minor direct, indirect, or cumulative impacts on wildlife present at the Marshall USARC. Existing wildlife consists of a few species found in typical urban environments such as songbirds, small mammals, and invertebrates. Although demolition or new construction activities would temporarily displace any individuals utilizing the area for habitat, there would be negligible to minor environmental effects.
- **Geology and Soil** – The No Action Alternative would have no impact on the vegetation present at the Marshall USARC. The action alternatives would have minor direct, indirect, or cumulative impacts on the geology or soil at the Marshall USARC because the soils present at the property have been compacted and disturbed from previous typical development and urban activities. Demolition or new construction activities may involve excavation, grading, and movement of heavy equipment at the Marshall USARC. These activities would disturb the surface soil, increasing the potential for soil erosion by wind or runoff. Impacts would be minor because appropriate sediment control measures would be applied in accordance with local regulations to reduce erosion. Geological hazards such as sinkholes, caves, mines, or quarries do not exist on or adjacent to the property. Seismic risk is relatively small.
- **Demographics** – The alternatives would have no direct, indirect, or cumulative impacts on demographics because the proposed action would not alter the composition of the population in the region of influence (ROI). Under Alternative 5 – Traditional Army Disposal and Residential Reuse, there could be negligible/minor impacts to demographics because new housing would be constructed on the property. However, it is likely that most new residents would not be relocating from outside of the ROI.

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- **Utilities** – The alternatives would have negligible direct, indirect, or cumulative impacts on utility services because the utilities available at the USARC have the capacity to provide service for any of the alternatives and any change in demand and usage would be non-significant (LRA 2007).
 - **Hydrology/Groundwater** – The No Action and Caretaker Status Alternatives would have no impact on the hydrology/groundwater at the Marshall USARC. The action alternatives would have negligible/minor direct, indirect, or cumulative impacts on the hydrology of the property if demolition, construction, or other ground disturbing activities occur. Impacts would be negligible/minor because there are no major water resources on the property. It is likely that construction activities would not occur deep enough to affect groundwater.
 - **Surface Water (Streams, Ponds, etc.)** – The site reconnaissance revealed that no streams, ponds, or other surface water features are present on the property. However, Turtle Creek is a channelized, concrete-lined drainage that runs east-west approximately 60 feet north of the property. Sediment-laden runoff from demolition/construction activities and increased impervious surfaces could indirectly affect surface water quality downstream from the property. The USEPA National Pollutant Discharge Elimination System (NPDES) Program requires a permit for all construction activities that disturb more than 1 acre. Property transferees would adhere to applicable restrictions on the property imposed by federal, state, or local regulations.

4.2 Environmental Resources Analyzed in Detail

Eight resource areas, aesthetic and visual resources, air quality, hazardous and toxic substances, land use, noise, socioeconomics, transportation, and water resources, 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 Aesthetics and Visual Resources

4.2.1.1 Affected Environment

The Marshall USARC property occupies approximately 3.8 acres with two permanent structures: a main administration building and an OMS. The USARC property also contains two parking lots including an MEP area and POV parking. A chain-link security fence topped with barbed wire encloses the MEP area and the OMS. Both the 4,472 SF main building and the 1,328 SF OMS were constructed in 1959 on concrete foundations with concrete block walls covered with a brick veneer.

The main building is a rectangular, single-story structure. The building's interior consists of office space, classrooms, a kitchen area, storage, and a mechanical room. The OMS building is a one-bay, one-story maintenance shop used primarily for vehicle maintenance and storage. Other improvements on the property include a covered VWR with associated OWS system, and a picnic/break area shelter. Also located on the property are three CONEXs used to store field equipment (USACE 2007).

The property is in an urban setting and over one-third of the property is covered by impervious features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass and gravel.

The view from the property is dominated by a commercial and institutional landscape. The dominant view to the north consists of the Marshall High School campus, including athletic fields. East of the property is a Marshall Independent School District Administration Building. South of the property is commercial development, including a mall and restaurants. West of the property is a commercial development and single family homes. East Pinecrest Drive borders the south and Maverick Avenue borders the west side of the USARC property.

4.2.1.2 Consequences

Potential impacts to aesthetic and visual resources are considered significant if the proposed action would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

After performing an analysis of aesthetic and visual resources, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.1.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for aesthetic and visual resources are anticipated. No direct impacts to visual resources would occur, because no demolition, construction, or ground-disturbing activities would take place.

Indirect Impacts. No changes to the existing baseline conditions for aesthetic and visual resources are anticipated. No demolition, construction, or ground-disturbing activities would take place.

4.2.1.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There would be negligible direct adverse impacts under this alternative. Although the caretaker would insure public safety and security of the remaining government property, long-term caretaker status could result in a decrease in the frequency of mowing, weeding, and visual maintenance that may have a negligible adverse impact on aesthetic resources.

Indirect Impacts. There are no known indirect impacts to aesthetics and visual resources that would either occur later in time or farther removed in distance under this alternative.

4.2.1.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. There would be minor, short- and long-term, direct impacts to aesthetics and visual resources under this alternative. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. If the existing buildings are renovated, short-term impacts would be negligible. There would be temporary construction debris and vehicles on the property, but it would be minimal since most of the renovations would be interior. Any modifications to existing buildings, and landscaping would be consistent with surrounding land uses and would result in negligible long-term direct impacts to the visual character of the property.

Minor short-term adverse direct impacts would be expected if the existing building is demolished and there is new construction of educational facilities. Ground disturbance, tree clearing, demolition, and construction activities would result in minor, short-term adverse impacts to aesthetics and visual resources.

A potential for new or improved building(s) and landscaping would result in minor, long-term beneficial impacts to the visual character of the property. New construction would be accomplished in accordance with the City of Marshall General Plan, design standards, and building and zoning codes, helping to ensure that facilities are compatible with their surroundings (City of Marshall 2006; City of Marshall 2012).

It is likely under this alternative that there would be more signage on buildings or at the entrances to the property. In addition, depending on the types of educational uses incorporated in the final design, there is the potential that buildings may remain open later in the evening requiring more parking lot lighting and/or building lighting. These elements would change the existing visual landscape of the area and could result in minor, long-term impacts to the visual character of the property. However, outside lighting features and signs would conform to City of Marshall zoning regulations (City of Marshall 2012).

Indirect Impacts. There are no known indirect impacts to aesthetics and visual resources that would either occur later in time or farther removed in distance under this alternative.

4.2.1.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. There would be minor, short- and long-term, direct impacts to aesthetics and visual resources under this alternative. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. If the existing buildings are renovated, short-term impacts would be negligible. There would be temporary construction debris and vehicles on the property, but it would be minimal since most of the renovations would be interior. Any modifications to existing buildings and landscaping would be consistent with surrounding land uses and would result in negligible long-term direct impacts to the visual character of the property.

Ground disturbance, tree clearing, demolition, and construction activities would result in minor, short-term adverse impacts to aesthetics and visual resources if the existing building is demolished and there is new construction of businesses.

New or improved building(s) and landscaping would result in minor, long-term beneficial impacts to the visual character of the property. New construction would be accomplished in accordance with the City of Marshall General Plan, design standards, and building and zoning

codes, helping to ensure that facilities are compatible with their surroundings (City of Marshall 2006; City of Marshall 2012).

It is likely under this alternative that there would be more signage on buildings or at the entrances to the property. Buildings may also be taller than baseline conditions. The maximum building height for the C-3 General Business zoning designation is 6 stories (City of Marshall 2012). In addition, depending on the types of businesses incorporated in the final design, there is the potential that businesses may remain open later in the evening requiring more parking lot lighting and/or building lighting. These elements would change the existing visual landscape of the area and could result in minor, long-term impacts to the visual character of the property. However, outside lighting features and signs would conform to City of Marshall zoning regulations (City of Marshall 2012).

Indirect Impacts. There are no known indirect impacts to aesthetics and visual resources that would either occur later in time or farther removed in distance under this alternative.

4.2.1.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. There would be minor, short- and long-term, direct impacts to aesthetics and visual resources under this alternative. Minor, short-term adverse impacts would result from construction activities, vehicles, and equipment, ground disturbance and tree clearing on the property during the demolition of the existing USARC buildings and construction of new residential buildings. However, these impacts would be temporary, and once construction is complete, these visual impacts would be gone.

C-3 General Business zoning district permitted uses include some residential development, including single family dwellings, duplexes, triplexes, quadraplexes, townhomes, and group care homes. However, construction of apartments and condominiums are not allowed in areas zoned as C-3, General Business. Under this alternative a full build out residential design could range from a low density single family neighborhood with one dwelling per lot (approximately 4-8 units per acre) to several quadraplexes not to exceed a maximum of 4 units per 11,000 SF (approximately 16 units per acre) (City of Marshall 2012).

Currently, the surrounding visual landscape is dominated by a main thoroughfare and a mix of commercial and institutional properties; although there are some single family residential properties southwest of the property. A newly constructed single- or multi-family residential neighborhood would be somewhat inconsistent with the existing landscape and would result in minor long-term direct impacts to aesthetics and visual resources. However, the removal of military equipment and conversion of asphalt parking to yards and landscaping would result in minor long-term direct beneficial impacts to the visual character of the property. New construction would be accomplished in accordance with the city of Marshall General Plan and building and zoning codes, helping to ensure that facilities are compatible with their surroundings.

Indirect Impacts. There are no known indirect impacts to aesthetics and visual resources that would either occur later in time or farther removed in distance under this alternative.

4.2.2 Air Quality

4.2.2.1 Affected Environment

4.2.2.1.1 Ambient Air Quality Conditions

National Ambient Air Quality Standards

The status of the air quality in a given area is determined by the concentrations of various pollutants in the atmosphere. The Federal Clean Air Act (42 USC 7401-7671q) required the USEPA to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality throughout the United States. The USEPA established NAAQS for six criteria pollutants: carbon monoxide, nitrogen dioxide, sulfur dioxide, ozone, lead, and particulate matter.

Individual states can adopt the NAAQS or establish standards more stringent than the NAAQS. The Texas Commission on Environmental Quality has adopted the NAAQS. Visit <http://www.epa.gov/ebtpages/air.html> for more information about the national programs, technical policies, and regulations protecting the quality of air resources.

Attainment and Non-Attainment Areas

Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in “attainment” for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a “non-attainment” area for that pollutant. Areas in non-attainment for three of the criteria pollutants (ozone, carbon monoxide, and particulate matter equal to or less than 10 microns in size) are classified according to severity.

State Implementation Plans

The USEPA requires each state to prepare a State Implementation Plan (SIP) to bring non-attainment areas into attainment status. A SIP is a compilation of goals, strategies, source emission limitations and control requirements, schedules, and enforcement actions that would lead the state to compliance with all NAAQS. Once a nonattainment area has attained and maintained NAAQS; the state may request a redesignation. Part of the process includes developing a new maintenance SIP for EPA approval that includes a maintenance plan to keep the area in attainment for a 20-year period.

General Conformity Rule

The General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), requires any Federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the General Conformity Rule’s requirements and complete a Record of Non-applicability (RONA) or positively determine that the action conforms to the provisions and objectives of the SIP.

Greenhouse Gases

Executive Order 13423 directs federal agencies to reduce greenhouse gas emissions. Greenhouse gases (GHG) include water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), and several fluorocarbons (CFCs, HCFCs, and PFCs), and sulfur hexafluoride (SF₆).

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 (CO₂e), which is a metric measure used to compare the emissions from various greenhouse gases based upon their GWP. CO₂ has a GWP of 1, and is therefore the standard to which all other GHGs are measured. The GWP of methane is 23, nitrous oxide 296, and sulfur hexafluoride 23,900. For additional information on greenhouse gases visit:

- <http://www.epa.gov/climatechange/emissions/index.html>
- <http://www.epa.gov/cleanenergy/energy-resources/calculator.html>

The President's Council on Environmental Quality has established emissions of 25,000 metric tons of CO₂ gases as a screening level for including greenhouse gas emissions in NEPA analyses. Emissions below this screening level would not be expected to have any significant direct, indirect, or cumulative impacts on air quality.

Existing Environment

The Marshall USARC is located in Harrison County, Texas and the region is an:

- Attainment area for 8-hour ozone, particulate matter <10 micrograms, particulate matter <2.5 micrograms, sulfur dioxide, carbon monoxide, nitrogen dioxide, and lead.

Emission sources at the property include stationary, mobile, and fugitive categorizations. Potential stationary sources include heaters in the main building and the storage building that was the former OMS.

Air emissions from continued operations at the Marshall USARC (at levels similar to those that occurred prior to the BRAC 2005 Commission's recommendations for closure becoming final) are shown in Table 4-2 in Subsection 4.2.2.2.

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 carbon dioxide equivalent or more.

After performing an analysis of air quality, it was determined that no significant impacts would occur under any alternative.

The U.S. Army Institute of Public Health Technical Guide for Compliance with the General Conformity Rule and the USEPA Mobile and Nonroad model emission factors along with AP-42 were used to calculate current annual air emissions of the USARC (Existing Environment) and estimated annual air emissions for each of the alternatives of the proposed action (Environmental Consequences). Detailed air emission calculations are in Appendix B; the summary results of these calculations are shown in Table 4-2.

Table 4-2 Summary of Air Emissions for Each Alternative.

	Attainment or Non-Attainment Status	De Minimus Emission Levels (tons/year)	Emissions* Alternative 1 (tons/year)	Emissions* Alternative 2 (tons/year)	Emissions* Alternative 3 (tons/year)	Emissions* Alternative 4 (tons/year)	Emissions* Alternative 5 (tons/year)
NAAQS Pollutants							
Ozone (NOx)	Attainment	100	0.09	0.09	18.38	18.38	6.82
Ozone (VOC)	Attainment	100	1.15	1.15	4.70	4.70	2.49
Carbon Monoxide (CO)	Attainment	100	20.60	20.57	90.81	90.81	36.74
Sulfur dioxide (SO2)	Attainment	100	0.02	0.01	2.60	2.60	0.56
Nitrogen dioxide (NO2)	Attainment	100	0.09	0.09	18.38	18.38	6.82
Particulate (PM10)	Attainment	100	0.02	0.02	3.79	3.79	3.70
Particulate (PM 2.5)	Attainment	100	0.02	0.02	4.64	4.64	3.31
Lead	Attainment	25	--	--	--	--	--
Greenhouse gases							
Carbon Dioxide	Not Applicable	25,000	250		2,850	2,850	276
* Emissions from mobile and stationary sources.							
-- Trace amounts to small to measure							

Facilities that emit 25,000 metric tons or more per year of GHGs are required to submit annual reports to the USEPA. The list of facilities is public data. Per the 2012 USEPA database, the Marshall USARC is not a reporting facility (USEPA 2012). Therefore, calculations for greenhouse gas emissions evaluated mobile sources only (i.e. construction, maintenance, and personal and military vehicles). All of the alternatives evaluated in this EA would not have a significant impact on GHG emissions because the estimated CO₂ gas emissions are below the screening level of 25,000 metric tons. Emissions below this screening level would not be expected to have any significant direct, indirect, or cumulative impacts on air quality.

Detailed analysis of each alternative is described in the subsections below.

4.2.2.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for air quality resources are anticipated. Because no demolition or construction would occur on the Marshall USARC property, no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for air quality resources are anticipated. Because no demolition or construction would occur on the Marshall USARC property, no indirect impacts to these resources are anticipated.

4.2.2.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There would be short-term, negligible, beneficial direct impacts under Alternative 2. Under this alternative, the Army would provide for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of property. Most recently, the property had approximately 1 full time staff at the Marshall USARC on a daily basis with up to 42 additional reservists 1 weekend per month. Following closure, there has been a reduction of mobile emissions from government vehicles and POVs. The only on-site vehicles are for minimal maintenance activities. During the implementation of the caretaker status, there would be emissions from the vehicles and equipment needed to perform maintenance activities on-site.

During the implementation of the caretaker status there would be a reduction in air emissions associated with the operation of the natural gas boilers. While in caretaker status, the existing buildings would not require heating and cooling for human comfort; consequently emissions associated with these activities would be reduced.

The Marshall USARC property is located within Harrison County, Texas, which is designated as “in attainment” for all USEPA NAAQS criteria pollutants; therefore, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. Texas Air Pollution Control Regulations were reviewed and the project actions under Alternative 2 would be in accordance with all regulations within or referenced by the plan (TCEQ 2011).

Indirect Impacts. There are no measurable anticipated indirect impacts under this alternative because following the closure and during implementation of the caretaker status, there would be a net decrease in emissions since there would be no operations occurring at the property.

4.2.2.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. The primary emission sources for this project will be those associated with construction and renovation activities. Cumulative air emissions were calculated for various types of diesel engine vehicles and related equipment that are commonly used during construction and renovation projects. Under this alternative, there may be either renovation and reuse or demolition and new construction. The calculations and results in Appendix B are for demolition and new construction activities since that option would generate the most emissions.

Construction Impacts

There would be short-term, negligible to minor impacts during either the renovation or the demolition and new construction phase of the project. If only renovation activities occur, the modification would result in a short-term negligible increase in air emissions. There would be emissions from small interior and exterior renovation projects and painting. There would be additional mobile and non-road emissions from commuting construction workers and construction equipment. If the building is demolished and new construction occurs, there would be a short-term minor increase in air emissions as demonstrated in the calculations shown in Appendix B. Emissions would be created from the demolition, site preparation, new building construction, and concrete and asphalt paving. There would also be additional mobile emissions from commuting construction workers and construction equipment.

Operational Reuse Impacts

During the reuse, it is anticipated that the Grantee would use the boiler system in a renovated building at the same duration and capacity as the current use but during different times that may include more evening and weekend use. There would be long-term, moderate, adverse impacts from an increase in stationary source emissions from the construction of a new building (potentially up to 120,000 SF) that would use a gas boiler for heating. Mobile source emissions in the vicinity during the reuse would be greater than current conditions. Most recently, the property had approximately 1 full time staff at the Marshall USARC on a daily basis with up to an additional 42 reservists 1 weekend per month. During the reuse, the educational facility may generate up to 600 users on a typical day increasing mobile source emissions within the vicinity. There would also be more night and weekend use of the property.

The Marshall USARC property is located within Harrison County, Texas, which is designated as “in attainment” for all USEPA NAAQS criteria pollutants; therefore, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. Texas Air Pollution Control Regulations were reviewed and the project actions under Alternative 3 would be in accordance with all regulations within or referenced by the plan (TCEQ 2011).

Indirect Impacts. No indirect impacts to air quality would be expected under Alternative 3 as on-site emissions are directly related to the addition of vehicle emissions and construction related activities. No additional impacts are expected beyond the direct impacts noted above.

4.2.2.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. The primary emission sources for this project will be those associated with either renovation or demolition and construction activities. The calculations and results in Appendix B are for demolition and new construction activities since that option would generate the most emissions. All applicable construction and operation permits would be obtained as required by the Texas Commission on Environmental Quality. Permits would be obtained before the project begins. Construction standards would be in place to minimize any adverse impacts from fugitive dust.

Construction Impacts

There would be short-term, negligible to moderate impacts during either the renovation or the demolition and new construction phase of the project. If only renovation activities occur, the modification would result in a short-term negligible increase in air emissions. There would be emissions from small interior and exterior renovation projects and painting. There would be additional mobile and non-road emissions from commuting construction workers and construction equipment. If the building is demolished and new construction occurs, there would be a short-term moderate increase in air emissions as demonstrated in the calculations shown in Appendix B. Emissions would be created from the demolition, site preparation, new building construction, and concrete and asphalt paving. There would also be additional mobile emissions from commuting construction workers and construction equipment.

Operational Reuse Impacts

During the reuse, it is anticipated that the Grantee would use the boiler system in a renovated building generally at the same capacity as the current use. However, depending on the type of commercial reuse, the boilers may operate at longer hours each day and would include more

evenings and weekends. Any change to the use would be negligible. If demolition and new construction occurs, there would be long-term, moderate, adverse impacts to air quality under Alternative 4. There would be an increase in stationary source emissions from the construction of multiple new buildings (potentially up to 120,000 SF) that would use gas boilers for heating. Mobile source emissions in the vicinity during the reuse would be greater than current conditions with more use on night and weekends. Most recently, the property had approximately 1 full time staff at the Marshall USARC on a daily basis with up to an additional 42 reservists 1 weekend per month. During the reuse, the commercial properties may generate up to 600 users on a typical day.

The Marshall USARC property is located within Harrison County, Texas, which is designated as “in attainment” for all USEPA NAAQS criteria pollutants; therefore, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. Texas Air Pollution Control Regulations were reviewed and the project actions under Alternative 4 would be in accordance with all regulations within or referenced by the plan (TCEQ 2011).

Indirect Impacts. No indirect impacts to air quality would be expected under Alternative 4 as on-site emissions are directly related to the addition of vehicle emissions and construction related activities. No additional impacts are expected beyond the direct impacts noted above.

4.2.2.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. The primary emission sources for this project will be those associated with either renovation or demolition and construction activities. The calculations and results in Appendix B are for demolition and new construction activities since that option would generate the most emissions. All applicable construction and operation permits would be obtained as required by the Texas Commission on Environmental Quality. Permits would be obtained before the project begins. Construction standards would be in place to minimize any adverse impacts from fugitive dust.

Construction Impacts

There would be short-term, negligible to minor impacts during either the renovation or the demolition and new construction phase of the project. If only renovation activities occur, the modification would result in a short-term negligible increase in air emissions. There would be emissions from small interior and exterior renovation projects and painting. There would be additional mobile and non-road emissions from commuting construction workers and construction equipment. If the building is demolished and new construction occurs, there would be a short-term minor increase in air emissions as demonstrated in the calculations shown in Appendix B. Emissions would be created from the demolition, site preparation, new building construction, and concrete and asphalt paving. There would also be additional mobile emissions from commuting construction workers and construction equipment.

Operational Reuse Impacts

During the reuse, there would be an increase in stationary source emissions from the construction of multiple new residential buildings (potentially up to 50,000 SF) that would use gas boilers for heating. Mobile source emissions in the vicinity during the reuse would be greater than current conditions with more use on night and weekends. Most recently, the property had approximately 1 full time staff at the Marshall USARC on a daily basis with up to an additional 42 reservists 1 weekend per month. During the reuse, there could be up to 30 residential units at the property

with 1-2 vehicles per unit. There would be a minor increase in air emissions from the additional mobile sources under this alternative.

The Marshall USARC property is located within Harrison County, Texas, which is designated as “in attainment” for all USEPA NAAQS criteria pollutants; therefore, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. Texas Air Pollution Control Regulations were reviewed and the project actions under Alternative 5 would be in accordance with all regulations within or referenced by the plan (TCEQ 2011).

Indirect Impacts. No indirect impacts to air quality would be expected under Alternative 5 as on-site emissions are directly related to the addition of vehicle emissions and construction related activities. No additional impacts are expected beyond the direct impacts noted above.

4.2.3 Hazardous and Toxic Substances

4.2.3.1 Affected Environment

An ECP Report was completed for the Marshall USARC in February 2007 (USACE 2007). This document details the history of the property, including the U.S. Army Reserve and any prior tenant uses of the property and the resulting environmental condition of the property. The ECP was recertified in April 2012 (USAR 2012a). The sections below include a summary of the information contained in the two ECP documents that pertains to asbestos-containing material (ACM) and lead-based paint (LBP). Impact analysis for other hazardous and toxic substances can be found in Section 4.1 – Environmental Resources Eliminated from Further Considerations.

A component of the ECP report is the review of all reasonably obtainable federal, state, and local government records for the USARC and surrounding properties where there has been a release or likely release of any hazardous substance or any petroleum product and such substances or products are likely to cause or contribute to a release or threatened release of any hazardous substance or any petroleum product on the federal real property. An environmental database summary was obtained from Environmental Data Resources, Inc. (EDR) on July 18, 2006. The environmental database summary consolidates standard federal, state, local, and tribal environmental record sources based on ASTM D 6008-recommended minimum search distances from the property. A copy of the complete EDR report is included in Appendix E of the ECP report (USACE 2007).

There were no other environmental permits issued for the property; therefore, there were no permit applications or associated permit documentation available for review. There were no known contamination events on the property that required an environmental cleanup; therefore, the property did not participate in the Installation Restoration Program, Military Munitions Response Program, or a Compliance Cleanup program.

4.2.3.1.1 Past Uses and Operations

Historically, the property primarily functioned as an administrative, storage, and maintenance facility, including vehicle washing. The USARC was also used by reservists for drill activities on various weekends throughout the year. The OMS was used to perform routine vehicle maintenance including checking and changing fluids, replacement of brakes, and tune ups. Vehicle washing activities occurred at a covered VWR located in the southwest corner of the fenced MEP area. The VWR discharges to the city sanitary sewer system.

4.2.3.1.2 Waste Disposal Sites

The Marshall USARC is an RCRA CESQG. CESQGs are defined as facilities generating less than 100 kg of hazardous waste or less than 1 kg of acutely hazardous waste per month. The USARC is a CESQG of wastes generated during vehicle maintenance activities. No violations were reported for the property. There are no waste disposal sites on the property, and all solid and hazardous waste was disposed off-site at permitted facilities in accordance with local, state, and federal regulations. According to the environmental database report, no other federal RCRA small-quantity generators (SQGs) or large-quantity generators (LQGs) were located within one-quarter mile of the property.

4.2.3.1.3 Asbestos-Containing Material

Visual asbestos inspections conducted in 1999 and 2012 concluded that friable and non-friable ACM is located in the Marshall USARC main building and OMS. Asbestos was detected in both the corrugated pipe insulation and mudded elbows of the domestic cold water lines in the main administration building. The friable thermal system insulation (TSI) was classified in damaged condition, showing cracking, with a low potential for disturbance. Pipe sealant on the hot water supply lines and duct sealant on the heating, ventilating, and air conditioning (HVAC) duct in the main building were found to contain asbestos and were damaged (USACE 2007).

Presumed ACM vibration collars (flexible duct connectors) were found in the men's locker room in the main building and in the OMS. Both sets of collars were considered friable, in damaged condition, with a low probability for disturbance. All friable ACM was classified with a low probability for disturbance (USAR 2012b). The floor tile and surfacing materials were considered in good condition.

4.2.3.1.4 Lead-based Paint

The buildings at the USARC were constructed in 1959 and are presumed to have been painted with LBP. An LBP survey of the main building and OMS was completed in 2003 (USACE 2007). A metal exterior door to the OMS was the only area found to contain LBP, and no immediate actions were recommended. The report advised following proper worker and environmental protection procedures in lead-positive areas that would be disturbed. During the ECP site reconnaissance, painted surfaces were observed to be in good condition (USACE 2007).

4.2.3.1.5 Munitions and Explosives of Concern

Munitions and explosives of concern are not present on the Marshall USARC property and are discussed in Subsection 4.1.1 Environmental Resource Categories That Are Not Present.

4.2.3.1.6 Polychlorinated Biphenyls

PCBs are present on the Marshall USARC property and are discussed in Subsection 4.1.2 Environmental Resource Categories That Are Present but Not Impacted.

4.2.3.1.7 Radioactive Materials

Radioactive materials are not present on the Marshall USARC property and are discussed in Subsection 4.1.1 Environmental Resource Categories That Are Not Present.

4.2.3.1.8 Radon

Radon is present on the Marshall USARC property and is discussed in Subsection 4.1.2 Environmental Resource Categories That Are Present but Not Impacted.

4.2.3.1.9 Petroleum Products, Underground Storage Tanks (USTs), Aboveground Storage Tanks (ASTs)

Based on a review of available property records, a search of federal and state environmental databases, and interviews with USAR personnel, bulk petroleum ASTs and USTs have not been used on the USARC property. The property previously contained a subsurface OWS that was registered as a UST in 1997. That OWS was removed in 2000, and was replaced with the current aboveground OWS which includes a 250-gallon AST containing wastewater from the OWS.

Hazardous substances and POLs stored and used for vehicle maintenance activities and outdoor maintenance included motor oil, lubricants, paints, antifreeze, adhesives, sealants, degreasers, and pesticides. Hazardous materials and wastes were stored in two flammable materials storage cabinets in the OMS, within a parts washer with fluid in the OMS maintenance bay, and in two portable metal buildings located near the VWR and OWS (USACE 2007). Janitorial chemicals and building maintenance-related products were stored in the designated storage area within the janitorial closet in the administrative building. CERCLA regulates the cleanup of releases or threats of releases of hazardous substances, pollutants, or contaminants. There is no evidence that CERCLA-regulated hazardous substances were stored at the property for 1 year or more in excess of corresponding reportable quantities.

According to USAR personnel and property records, the disposal of hazardous materials or hazardous wastes has not occurred on the USARC property. Offsite disposal of hazardous waste was contracted through various qualified disposal companies that were awarded contracts through a bid system (USACE 2007). A Spill Notification Form for the property indicated that a spill of approximately 15 gallons of diesel fuel and hydraulic fluid occurred in the MEP area on December 1, 2005. The spill occurred when a crane rolled over during loading/unloading activities. The spill occurred on the north side of the driveway connecting the OMS to the VWR. In response to the spill, fluids were drained from the overturned crane to stop the leak and stained soil was manually excavated. USAR personnel stated that the spill did not leave the property boundary. No other releases of hazardous substances or petroleum products were identified (USACE 2007).

The RCRA regulates the management of hazardous waste, including storage, handling, transportation, treatment, and disposal. RCRA Corrective Action (CORRACT) sites represent facilities that have generated or managed hazardous wastes and require corrective action. The USARC property is not a CORRACT site, and no RCRA CORRACT sites were located within one mile of the Site.

The RCRA Information (RCRAInfo) database includes selective information on facilities that generate, transport, and treat, store, and/or dispose (TSD) of hazardous waste as defined by RCRA. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. No RCRA transporters or TSD facilities were identified on the RCRAInfo database within one-half mile of the property.

4.2.3.1.10 Other Chemical/Hazardous Substances

There were no indications in the ECP report that any other chemicals or hazardous materials, such as refrigerants and medical and biohazardous wastes, were improperly used or stored at the USARC property (USACE 2007). All hazardous materials were disposed of offsite through various qualified disposal companies that were awarded contracts through a bid system.

4.2.3.2 Consequences

4.2.3.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for hazardous and toxic substances are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no direct impacts to hazardous and toxic substances are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for hazardous and toxic substances are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no indirect impacts to hazardous and toxic substances are anticipated.

4.2.3.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Negligible short-term beneficial direct impacts are expected from hazardous and toxic substances under this alternative. The Army would continue maintenance activities necessary to protect the property and buildings from deterioration. No remedial activities (*e.g.*, removal of remaining ACM or LBP) would be performed by the Army under this alternative. Any remaining small quantities of hazardous and toxic substances stored onsite (*e.g.*, janitorial chemicals, vehicle maintenance products, and building maintenance-related products) would be disposed of by the Army in accordance with federal, state, local, and DoD requirements after closure of the Marshall USARC. The removal of these hazardous and toxic substances would result in a negligible short-term beneficial impact.

Hazardous substances storage, handling, and disposal activities under this alternative may include use of chemicals related to continued maintenance activities for the property, including POL, paints, and pesticides. These substances would not be stored on the property and would be disposed of by the Army in accordance with federal, state, local, and DoD requirements. Because vehicle maintenance activities would no longer occur on the property under this alternative, the USARC would cease to be a CESQG, and RCRA permits would no longer be required.

Indirect Impacts. No indirect impacts are anticipated under this alternative. Continuing maintenance activities and any appropriate use of small quantities of remaining hazardous and toxic substances would be limited to the Marshall USARC property.

4.2.3.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. There would be non-significant short- and long-term adverse direct impacts under Alternative 3. Hazardous substance storage, handling, and disposal activities would be in accordance with federal, state, and local requirements and impacts would be minor.

Hazardous substances storage, handling, and disposal activities under this alternative may include use of chemicals related to continued maintenance activities for the property, including

POL, paints, pesticides, and janitorial chemicals. These substances would be stored on the property and disposed of in accordance with federal, state, and local requirements.

An educational facility would likely be conditionally exempt from CERCLA federal hazardous waste regulations because they would generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. If the facility qualifies as an RCRA CESQG, waste disposal activities on the property would be conducted in accordance with local, state, and federal regulations.

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the transferee would assume responsibility for abatement or management of any ACM in accordance with applicable federal, state, and local requirements. Any remaining LBP would not present an unacceptable risk to human health, because the transferee 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 complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards.

As discussed in Subsection 4.1.1 Environmental Resource Categories That Are Not Present, there are no munitions of concern or radioactive materials on the property. Impacts from PCBs and radon on the property are discussed in Subsection 4.1.2 Environmental Resource Categories That Are Present but Not Impacted. The remaining OWS AST, pesticides, and any other hazardous substances would be stored, handled, and disposed of by the transferee in accordance with federal, state, and local requirements, and would not affect the reuse of this property for an educational facility.

Indirect Impacts. No indirect impacts are anticipated under this alternative since impacts would be limited to the Marshall USARC property.

4.2.3.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. There would be non-significant short- and long-term adverse direct impacts under Alternative 4. Hazardous substance storage, handling, and disposal activities would be in accordance with federal, state, and local requirements and impacts would be minor.

Hazardous substances storage, handling, and disposal activities under this alternative may include use of chemicals related to continued maintenance activities for the property, including POL, paints, pesticides, and janitorial chemicals. These substances would be stored on the property and disposed of in accordance with federal, state, and local requirements.

A commercial facility would likely be a small business due to the location and size of the property and would be conditionally exempt from CERCLA federal hazardous waste regulations because they would generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. However, if the facility is not exempt from CERCLA or qualifies as an RCRA CESQG, hazardous waste storage, handling, and disposal activities on the property would be conducted in accordance with local, state, and federal regulations.

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the transferee would assume responsibility for abatement or management of any ACM in accordance with applicable federal, state, and local requirements. Any remaining LBP would not present an unacceptable risk to human health,

because the transferee 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 complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards.

As discussed in Subsection 4.1.1 Environmental Resource Categories That Are Not Present, there are no munitions of concern or radioactive materials on the property. Impacts from PCBs and radon on the property are discussed in Subsection 4.1.2 Environmental Resource Categories That Are Present but Not Impacted. The remaining OWS AST, pesticides, and any other hazardous substances would be stored, handled, and disposed of by the transferee in accordance with federal, state, and local requirements, and would not affect the reuse of this property for a commercial facility.

Indirect Impacts. No indirect impacts are anticipated under this alternative since impacts would be limited to the Marshall USARC property.

4.2.3.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. There would be non-significant short- and long-term adverse direct impacts under Alternative 5. Hazardous substance storage, handling, and disposal activities would be in accordance with federal, state, and local requirements and impacts would be minor.

Hazardous substances storage, handling, and disposal activities under this alternative may include use of chemicals related to continued maintenance activities for residences on the property, including POL, paints, pesticides, and household chemicals. These substances would be stored in residences and disposed of in accordance with federal, state, and local requirements.

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the transferee would assume responsibility for abatement or management of any ACM in accordance with applicable federal, state, and local requirements. Any remaining LBP would not present an unacceptable risk to human health, because the transferee 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 complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards.

As discussed in Subsection 4.1.1 Environmental Resource Categories That Are Not Present, there are no munitions of concern or radioactive materials on the property. Impacts from PCBs and radon on the property are discussed in Subsection 4.1.2 Environmental Resource Categories That Are Present but Not Impacted. The remaining OWS AST would be removed or closed in place. Any hazardous substances remaining on the property would be disposed of in accordance with federal, state, and local regulations prior to conversion to residential use.

Indirect Impacts. No indirect impacts are anticipated under this alternative since impacts would be limited to the Marshall USARC property.

4.2.4 Land Use

4.2.4.1 Affected Environment

The Marshall USARC is located in Harrison County, on the southeastern side of the City of Marshall, Texas (Figures 1-1 and 1-2). Marshall is located in the eastern part of Texas,

approximately 150 miles east of Dallas and 35 miles west of Shreveport, Louisiana. The property occupies approximately 3.8 acres and is located on the U.S. Geological Survey (USGS) 7.5-Minute Marshall East, Texas Quadrangle map.

4.2.4.1.1 Current and Future Development in the Region of Influence

The City of Marshall's General Plan emphasizes development of centers of business and institutional activity in the community. These activity centers are expected to remain the focus of most business, employment, and shopping activity in Marshall. The property within the vicinity of the mall and the high school at U.S. Highway 59 and State Highway 43 (East Pinecrest Drive) is identified as an activity center in Marshall's General Plan because of the major activities that are concentrated in the vicinity of this intersection. These major activities include the Marshall Mall, the Marshall Civic Center, the north campus of Texas State Technical College, Marshall High School, and a variety of smaller businesses. The Marshall USARC is located within this activity center. The city's General Plan calls for continued development of activity centers as a way to utilize existing resources in an efficient manner and as a way to support additional economic development in the community (City of Marshall 2006; LRA 2007).

The City of Marshall's Branding, Development & Marketing Action Plan (Destination Development, Inc. 2007) is a detailed action plan to increase visitor spending in the community and to enhance the tourism industry. The plan outlines steps to develop downtown Marshall into a regional hub for the arts, entertainment and education (Destination Development, Inc. 2007).

According to the Mayor and the Acting City Manager of Marshall, there have been no recent development projects in the immediate vicinity of the Marshall USARC (Parsons 2014). However, there has been continued redevelopment and revitalization of homes, businesses, and government buildings in and around established activity centers in Marshall, including the vicinity of the mall and the high school at the intersection of East Pinecrest Drive and Highway 59. In addition, the Marshall Independent School District 2014 Bond referendum calls for improvements to Marshall High School located adjacent and north of the Marshall USARC property, including proposed renovations to Maverick Stadium and renovations and additions to Marshall High School (Marshall ISD 2014). The Interstate 69 (I-69) System Harrison County/Marshall Route Study will determine options for development of I-369 in the Marshall area, including an option for upgrade of existing U.S. Highway 59 through Marshall to an interstate highway (TXDOT 2014a).

4.2.4.1.2 Installation Land

The Marshall USARC contains two permanent structures: a 4,472 SF main administration building and a 1,328 SF OMS. The property also contains two parking lots including a POV parking area and a fenced in MEP area. Approximately one-third of the property is covered by impervious surfaces such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land cover is primarily maintained grass and gravel.

The Marshall USARC was most recently occupied by the 721st Engineer Company. The USARC primarily functioned as an administrative, storage, and vehicle maintenance training facility and was also used by reservists for training and drill activities on various weekends throughout the year.

In the Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act (2006), Table 4-1, titled Land Use Intensity Parameters, characterizes land use by using intensity parameters to evaluate how intensely a site will be reused. A FAR is used to determine the intensity level of a reuse based on how much building development occurs at a site or across an area. Based on the current total building area (approximately 5,800 SF) on the USARC property (3.8 acres or approximately 165,528 SF) there is a 0.04 FAR, which is a low intensity level use.

The property is zoned by the City of Marshall as C-3, General Business, a designation that prohibits industrial use and housing consisting of more than four connected units but allows for a wide variety of retail, restaurant, office, transportation, institutional, medical, and other residential uses (City of Marshall 2012).

4.2.4.1.3 Surrounding Land

The land use surrounding the Marshall USARC is primarily mixed commercial and institutional. The Marshall High School campus is located north of the USARC property. This campus houses approximately 1,600 students in grades nine through twelve. Classes are typically in session from late August through the end of May. There is typically a short summer school session during the summer for a small number of students. The campus includes a full range of athletic facilities for use by school teams. The Marshall Independent School District Administration Building lies east of the USARC. South of the property is the Marshall Mall, which includes a Blue Cross Blue Shield call center, Beall's Department Store, J.C. Penney Department Store, Baskin's Department Store, and other small shops and offices in approximately 250,000 SF of retail space. Three restaurants, a bank, and a real estate office are also located on the mall property. A tire store and single family residences are located to the southwest across Pinecrest Drive. The property to the west includes an office, a bank, a church, a grocery store, and other small shops and offices. Other notable land uses within a ½ mile radius of the Marshall USARC include the Marshall Civic Center, which is located immediately south of Marshall Mall, and the north campus of the Texas State Technical College in Marshall, which is located on the east side of U.S. Highway 59 across from the Mall (LRA 2007).

4.2.4.2 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.

After performing an analysis of land use, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.4.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of land use are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no direct impacts to land use are anticipated.

Indirect Impacts. No changes to the existing baseline conditions of land use are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no indirect impacts to land use are anticipated.

4.2.4.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There are minor direct impacts to land use under this alternative. The Marshall USARC property would continue to contain two permanent structures, two parking areas, and maintained grass under this alternative, and maintenance activities are expected to continue for the existing facilities. However, the former occupants of the USARC property have been relocated, resulting in reduced activity and vacant buildings on the property.

Indirect Impacts. There are minor indirect impacts to land use under this alternative. Maintenance activities are expected to continue for the current facilities. However, a vacant property could negatively affect surrounding land use by having a diminished appearance and leaving the property more vulnerable to vandalism or theft.

4.2.4.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. There would be minor beneficial direct impacts to land use under this alternative. Land use would change from training and administrative activities associated with national defense to full build-out as an educational facility.

Based on the current total building area (approximately 5,800 SF) on the property (3.8 acres or approximately 165,528 SF) there is a 0.04 FAR, which is a low intensity level use. Although the City of Marshall zoning ordinance allows for high intensity development in the C-3 zoning district, the intensity of development on the Marshall USARC property is limited by 0.9 acres of regulatory floodplain on the north portion of the property.

Therefore, under Alternative 3, a medium-high intensity level (0.30-0.70 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for educational use. Although the land use intensity would increase under this alternative, the reuse of the site would result in a beneficial use of the land for local residents and the community by providing an educational facility for local residents.

There would be no changes to zoning under this alternative. The reuse as an educational facility is compatible with the C-3, General Business, zoning designation. Educational and institutional uses under this zoning designation include, but are not limited to, primary and secondary schools, trade schools, business schools, colleges or universities, convention facilities, child care centers, churches, libraries, and museums. The Grantee would comply with federal, state, and local laws and would obtain any applicable construction and zoning permits or other required permits associated with renovation and new construction on the property.

The reuse as a commercial facility would be compatible with the surrounding mixed commercial and institutional uses. It would comply with the City of Marshall's General Plan, which designates the USARC property in a major activity center, having a wide range of retail, service, institutional, and civic activities.

Indirect Impacts. No indirect impacts on land use are anticipated, as there would be no changes to land use on adjacent properties as a result of this action.

4.2.4.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. There would be minor beneficial direct impacts to land use under this alternative. Land use would change from training and administrative activities associated with national defense to full build-out as commercial.

Based on the current total building area (approximately 5,800 SF) on the property (3.8 acres or approximately 165,528 SF) there is a 0.04 FAR, which is a low intensity level use. Although the City of Marshall zoning ordinance allows for high intensity development in the C-3 zoning district, the intensity of development on the Marshall USARC property is limited by floodplain and saturated conditions present on the north portion of the property.

Therefore, under Alternative 4, a medium-high intensity level (0.30-0.70 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for commercial use. Although the land use intensity would increase under this alternative, the reuse of the site would result in a beneficial use of the land for local residents and the community by providing expansion of employment and retail activities.

There would be no changes to zoning under this alternative. The reuse as commercial is compatible with the C-3, General Business, zoning designation. Commercial uses under this zoning designation include, but are not limited to, retail, banks, hotels, restaurants, community centers, museums, amusement enterprises, theaters, child care, repair services, automobile sales and service, parking garages or lots, storage units, warehousing, or office space (local government, organizations, or private business). The Grantee would comply with federal, state, and local laws and would obtain any applicable construction and zoning permits or other required permits associated with renovation and new construction on the property.

The reuse as a commercial facility would be compatible with the surrounding mixed commercial and institutional uses. It would comply with the City of Marshall's General Plan, which designates the USARC property in a major activity center, having a wide range of retail, service, institutional, and civic activities.

Indirect Impacts. No indirect impacts on land use are anticipated, as there would be no changes to land use on adjacent properties as a result of this action.

4.2.4.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. There would be minor beneficial direct impacts to land use under this alternative. Land use would change from training and administrative activities associated with national defense to full build-out as residential.

Based on the current total building area (approximately 5,800 SF) on the property (3.8 acres or approximately 165,528 SF) there is a 0.04 FAR, which is a low intensity level use. Although the City of Marshall zoning ordinance allows for high intensity development in the C-3 zoning district, the intensity of development on the Marshall USARC property is limited by floodplain and saturated conditions present on the north portion of the property.

Therefore, under Alternative 5, a medium intensity level (0.10-0.30 FAR) reuse of the property will be analyzed to allow for the evaluation of development of the property for residential use. Although the land use intensity would increase under this alternative, the reuse of the site would result in a beneficial use of the land for local residents and the community by providing

additional housing options. However, the City of Marshall's General Plan designates the Marshall USARC property in a major activity center that would allow a wide range of retail, service, institutional, and civic activities. These activity centers are expected to remain the focus of most business, employment, and shopping activity in Marshall. The General Plan encourages commercial development along major thoroughfares, including East Pinecrest Drive (State Highway 43).

There would be no changes to zoning under this alternative. A residential reuse is compatible with the C-3, General Business, zoning designation. Permitted uses include some residential development, including single family dwellings, duplexes, triplexes, quadraplexes, townhomes, and group care homes. However, construction of apartments and condominiums is not allowed in areas zoned as C-3, General Business. The Grantee would comply with federal, state, and local laws and would obtain any applicable construction and zoning permits or other required permits associated with new construction on the property.

Indirect Impacts. No indirect impacts on land use are anticipated, as there would be no changes to land use on adjacent properties as a result of this action.

4.2.5 Noise

4.2.5.1 Affected Environment

When in operation, the major sources of noise¹ at the USARC property were generated by daily POV use by one full-time employee, heating, ventilation, and HVAC systems for a 16,132 square foot administration building and a 5,081 square-foot storage building, and POV and limited military equipment use and vehicle maintenance and repair activities during training activities on 1 weekend per month. These noise sources are directly comparable to surrounding institutional, commercial, and residential traffic noise. As such, activities performed at the USARC facility did not add to ambient noise levels.

The City of Marshall maintains a general nuisance noise ordinance; the code, however, does not set explicit not-to-exceed sound levels (Marshall Code of Ordinances, Section 20-5 Noises). Although construction noise is not stated to be exempt from the noise ordinance, construction in public rights-of-way is limited to the hours between 7 a.m. and 6 p.m., Monday through Friday (Marshall Code of Ordinances, Section 25-156 Construction Obligations).

Surrounding noise is generated by institutional (Marshall High School) and commercial activities (Marshall Mall). Typical background levels of noise in urban residential areas range from 55 dBA to 70 dBA (USEPA 1978). Vehicle noise can be attributed to East Pinecrest Drive to the south, U.S. Highway 59 to the east, and Maverick Drive to the west. U.S. Highway 59 is a major north-south transportation artery in the central U.S. Pinecrest Drive is a 4-lane principal arterial road with an average of 11,200 vehicles each per 24-hour period (LRA 2007).

Maverick Drive serves as the primary means of access to the Marshall High School Campus. Traffic would be described as moderately heavy from 7:30 to 8:00 a.m. and from 3:00 to 3:30 pm when the high school is in session. Other noise sources include commercial development and fast food restaurants south of the property. The nearest sensitive noise receptors are

¹ Noise is expressed as sound pressure level in decibels or A-weighted decibels, which is weighted toward those portions of the frequency spectrum, between 20 and 20,000 hertz (cycles per second), to which the human ear is most sensitive (DOE 1998).

Marshall High School to the north, Marshall Independent School District Administration Building to the east, and a church to the west of the USARC.

4.2.5.2 Consequences

Effects to the noise environment are considered significant if the proposed action would:

- Conflict with applicable federal, state, interstate, or local noise control regulations; or
- Result in continuous and long-term noise levels that are ≥ 85 dB, which is the threshold of hearing damage with prolonged exposure.

After performing an analysis of noise, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.5.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of noise are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no direct impacts from noise are anticipated. Noise levels from vehicle operations would continue at baseline levels.

Indirect Impacts. No changes to the existing baseline conditions of noise are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no indirect impacts from noise are anticipated. Noise levels from vehicle operations would continue at baseline levels.

4.2.5.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Short-term, minor, beneficial impacts to noise would occur under the Caretaker Status Alternative. If the Army finds it necessary to place the Marshall USARC in caretaker status for an indefinite period, the Army would ensure public safety and security of the remaining government property. Maintenance activities are expected to continue for the buildings, grounds, and paved areas. It is likely caretaker activities would result in noise levels below baseline levels because of reduced vehicle and training activities at the USARC. Reduced noise levels would occur throughout the period of caretaker status, resulting in short-term minor beneficial impacts to noise.

Indirect Impacts. No indirect impacts due to noise are anticipated as compared to baseline conditions as changes in noise levels would be limited to on-site caretaker activities, which would not occur at a later time or farther removed in distance.

4.2.5.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. There would be short-term, negligible to minor and long-term, negligible adverse impacts from noise due to the change in noise levels associated with the reuse of the Marshall USARC for educational use. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. Negligible short-term adverse direct impacts would be expected from the renovation of the existing building. Construction noise, including equipment noise, is expected to be minimal under this alternative. The renovation would be mainly interior work that includes, but is not limited to,

painting, new carpeting, new drywall, updates to bathrooms, updates and repairs to electrical and HVAC systems.

Minor short-term adverse direct impacts would be expected if the current USARC buildings are demolished and a new facility is constructed. Construction noise, including equipment noise, typically does not contribute substantially to long-term average noise levels, but consists of frequent, highly intrusive sounds of 87 to 96 dBA (Suter 2002). To reduce impacts associated with noise levels, best management practices (BMPs), including limiting construction activities to between 7:00 am and 10:00 pm and ensuring construction equipment mufflers are properly maintained and are in good working condition, would be used.

Negligible long-term adverse direct impacts would occur based on the future use of the Marshall USARC property as an educational facility. The USARC was previously occupied by 1 person on a daily basis during normal business hours and 42 people training there one weekend per month. During the reuse, there is the potential for additional people and vehicles during the day as well as more weekend and evening use, which could produce more noise than baseline. However, the noise of an educational facility would be consistent with the noise levels of adjacent commercial and institutional properties and the adjacent principal arterial roads. Noise levels would comply with applicable federal, state, interstate, or local noise control regulations.

Indirect Impacts. No indirect impacts from noise are anticipated, as there would be no changes to noise levels on adjacent properties or at a distance from the reuse as a result of this action.

4.2.5.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. Under Alternative 4 there would be short-term, negligible to minor and long-term, minor adverse impacts from noise due to the change in noise levels associated with the reuse of the Marshall USARC for full build-out as commercial. The reuse may include either the renovation of existing buildings or demolition of existing buildings and construction of new buildings. Short-term impacts under Alternative 4 would be similar to those listed under Alternative 3.

Minor long-term adverse direct impacts would occur based on the future use of the Marshall USARC property as full build-out as commercial. The presence of more businesses may increase noise levels slightly over baseline levels due to increased business traffic volume. However, noise levels would be consistent with the noise levels of adjacent commercial and institutional properties and the adjacent principal arterial roads. Traffic noise would be variable throughout the day with possible increased traffic noise during work/commute times, in the evenings, and on weekends. Noise levels would comply with applicable federal, state, interstate, or local noise control regulations and would be compatible with surrounding land use.

Indirect Impacts. No indirect impacts on noise are anticipated, as there would be no changes to noise levels on adjacent properties or at a distance from the reuse as a result of this action.

4.2.5.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. Under Alternative 5 there would be short-term, minor and long-term, negligible adverse impacts to noise due to the change in noise levels associated with the reuse of the Marshall USARC for full build-out residential. Under the medium reuse intensity, there is the potential for up to approximately 30 new residential units (quadraplexes) on the 3.8-acre property (City of Marshall 2012). The reuse would include demolition of existing buildings and

construction of new buildings. Short-term impacts from demolition and new construction noise under Alternative 5 would be similar to those listed under Alternative 3.

Negligible long-term adverse direct impacts would occur based on the future use of the Marshall USARC property as a residential development. The surrounding properties have mostly institutional and commercial land uses. Although the residential reuse would be consistent with the noise levels of adjacent properties, there would be more noise than baseline from a higher intensity use of the property. Future vehicle use would consist primarily of privately owned vehicles. Noise levels would comply with applicable federal, state, interstate, local, and/or occupational noise control regulations.

Indirect Impacts. No indirect impacts on noise are anticipated, as there would be no changes to noise levels on adjacent properties or at a distance from the reuse as a result of this action.

4.2.6 Socioeconomics

4.2.6.1 Affected Environment

The following sections discuss the existing economic and social conditions of the ROI:

- Local and regional economic activity,
- Housing,
- Public services,
- Environmental justice in minority and low-income populations, and
- Protection of children from environmental health risks and safety risks.

The Marshall USARC is located in the Marshall, Texas Micropolitan Statistical Area (μ SA), which is the ROI for this socioeconomic analysis. The Marshall, Texas μ SA is comprised of Harrison County.

4.2.6.1.1 Economic Development

Local Economic Activity

The Marshall USARC was most recently occupied with 1 full time employee and 42 reservists that trained at the facility one weekend a month. Expenditures by employees were spent in the local economy.

Regional Economic Activity

Marshall is the county seat of Harrison County and draws from a large workforce of 250,000 in a 30-mile radius (MEDC 2014). Marshall has a diverse economy that employs a variety of industries including manufacturing, healthcare services, transportation services, and the oil and gas industry. The State of Texas and most of its major metropolitan areas fared the recession quite well. Unlike many other places in the nation, Texas did not experience huge housing bubbles followed by a crash; furthermore, their economies weren't rooted in the auto industry (Yousuf 2010). Although unemployment in the state and the μ SA did increase during the recession and recession recovery, the peak unemployment was around 8 percent for the region. The U.S. unemployment rate peaked at nearly 10 percent. Unemployment in the region since the recession has decreased at a faster rate as well; however, some of the decline may be attributed to some labor force fluctuation. Since 2008, the labor force has remained relatively stable

fluctuating between 32,000 and 34,000. Labor force information and unemployment rates for the county, state, and nation are shown in Tables 4-3 and 4-4.

Jurisdiction	2008	2009	2010	2011	2012
Marshall μ SA	32,266	32,972	33,548	34,033	33,966
Texas	11,650,935	11,968,709	12,281,023	12,484,241	12,597,465
United States	154,287,000	154,142,000	153,889,000	153,617,000	154,975,000

¹ : μ SA = micropolitan statistical area
Source: Bureau of Labor Statistics 2008, 2009a, 2009b, 2010, 2011a, 2011b, 2012a, and 2012b

Jurisdiction	2008	2009	2010	2011	2012
Marshall μ SA	4.7	8.1	8.6	7.7	6.9
Texas	4.9	7.5	8.2	7.9	6.8
United States	5.8	9.3	9.6	8.9	8.1

¹ : μ SA = micropolitan statistical area
Source: Bureau of Labor Statistics 2008, 2009a, 2009b, 2010, 2011a, 2011b, 2012a, and 2012b

Trade, transportation and utilities; education and health services, and manufacturing are the region's top industries as shown on Table 4-5. The top five employers in the Marshall area include Eastman Chemical Company, Trinity Industries, Good Shepherd Medical Center, Blue Cross Blue Shield, and Fowler Transportation. All of the top employers have between 350 and 1,520 full time employees (MEDC 2014).

Table 4-5 Non-Agricultural Wage and Salary Employment by NAICS Industry for the Marshall, TX μSA (2012, 2013)			
Industry	2012 Annual Average 3rd Quarter (persons)	2013 Annual Average 3rd Quarter (persons)	2012-2013 Percent Change
Natural and Resources Mining	2,536	2,676	5.5
Construction	1,493	1,445	(3.2)
Manufacturing	3,471	5,124	47.62
Trade (Wholesale and Retail), Transportation, and Utilities	4,323	4,291	(0.7)
Information	144	172	19.4
Financial Activities	1,521	1,668	9.7
Professional and Business Services	1,385	1,274	(8.0)
Education and Health Services	5,124	4,767	(7.0)
Leisure and Hospitality	1,640	1,567	(4.5)
Other Services	919	1,039	13.0
Public Administration	660	622	(5.8)
Total	23,216	24,650	6.2
<i>Source: Bureau of Economic Analysis 2012, 2013.</i>			
() Indicates a Decrease			

4.2.6.1.2 Housing

According to the U.S. Census, 73 percent of the housing units in the Marshall μ SA are owner-occupied, which is greater than the state and the nation's rate. Median household income in the μ SA is nearly 13 percent lower than the nation, but the housing costs differ by approximately 49 percent. Vacancy rates in the ROI (approximately 17%) are much higher than the rate in the state and the nation, which are both at approximately 12%. Housing information for the region is shown in Table 4-6.

Jurisdiction	Total Housing Units 2011	Percent Vacant 2011	Percent Owner Occupied 2011	Median Value Owner Occupied 2011	Median Gross Rent 2011	Median Household Income 2011
Marshall	9,573	17.3	59.9	\$88,700	\$647	\$32,944
Marshall μ SA	27,714	16.5	73.1	\$109,900	\$676	\$46,718
Texas	9,978,137	12.0	63.9	\$128,000	\$834	\$51,563
United States	131,642,457	12.5	65.5	\$181,400	\$889	\$53,046

¹ μ SA = micropolitan statistical area
Source: U.S. Department of Commerce, U.S. Census Bureau – American Community Survey 5-year Estimates, 2007-2011.

At the time of this writing there were approximately 172 single family homes listed for sale in the Marshall area (National Association of Realtors 2014). Within 10 miles of Marshall, there were 501 single family homes listed. Approximately 62 percent of the homes were listed at \$150,000 or lower. There were only 4 multi-family properties listed in the City of Marshall. Within 20 miles of Marshall, there were 24 listed.

4.2.6.1.3 Public Services

Education

The Marshall ROI has approximately 17 elementary schools, 10 middle schools, and 10 high schools with a total student enrollment of 13,126 students in grades pre-k through 12. The ROI has 2 private schools. Marshall Christian Academy enrolls 66 students in grades K-12, and Trinity Episcopal School enrolls 233 students in grades K-9. Both private schools are within a one mile radius of the Marshall USARC. There are three public schools within 1 mile of the USARC. Texas Early College High School enrolls 88 students in grades 8-12, and Marshall High School has 1,433 students in grades 9-12. South Marshall Elementary School, approximately ½ mile away, has 500 students in K-4 (Public School Review 2013; Private School Review 2013).

Health

The city of Marshall residents are served by the Good Shepherd Medical Center (AHD 2014). The hospital is approximately 1.5 miles to the northwest of the property. It is a 124-bed hospital that offers a variety of specialty services that include neuroscience, orthopedics, radiology/imaging, rehabilitation, and surgery (GSMC 2014).

Law Enforcement

Law enforcement within the city of Marshall is provided by the city of Marshall Police Department and the Harrison County Sheriff's Department. Marshall has a police department that is comprised of approximately 54 officers and 19 civilians (MPD 2014). The department features many specialized divisions that include crime scene investigation, special response team, canine patrol, narcotics, motorcycle patrol, community policing, and the D.A.R.E. program.

Fire Protection

Fire suppression, prevention, and emergency medical services (EMS) support within the city of Marshall is provided by the city of Marshall Fire Department. There are three fire stations staffed full time. Equipment includes three engines, two ladders, and six Mobile Intensive Care Unit (MICU) ambulances. The department also has a variety of specialty vehicles that includes a hazardous material unit, a technical rescue unit, two water rescue units, eight brush units, and a command/rehab vehicle, and there are five pumpers and one ladder that are maintained as a reserve apparatus fleet (City of Marshall 2014).

Recreation

The Marshall Parks and Recreation Department manages the local parks, open space, and recreational facilities within the city system. The city of Marshall has eight parks, a municipal pool, and a golf course. The department also offers Youth Baseball and Youth Softball programs (Marshall Parks and Recreation 2014). The park nearest to the USARC is City Park located approximately 1.5 miles to the northwest.

4.2.6.1.4 Environmental Justice

On February 11, 1994, President Clinton issued *Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. The purpose of this EO is to avoid the disproportionate placement of adverse environmental, economic, social, or health impacts from Federal actions and policies on minority and low-income populations or health impacts from Federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as minority or low-income individuals or groups of individuals subject to an actual or potential health, economic, or environmental threat arising from existing or proposed Federal actions and policies. Low-income, i.e., at or below the poverty threshold, is defined as the aggregate annual mean income, which for a family of four was \$23,492 in 2012.

Tables 4-7 and 4-8 summarize minority and low-income populations for the area. According to the U.S. Census, the city of Marshall has a much higher rate of those in poverty than the μ SA.

Table 4-7 Low-Income Populations: Marshall USARC Region and Larger Regions, 2011.

Jurisdiction	Total Population	Median Household Income	All People Whose Income is Below Poverty Level (%)
Marshall	23,922	\$32,944	23.1
Marshall μ SA	65,958	\$46,718	13.0
Texas	25,208,897	\$51,563	13.5
United States	309,138,711	\$53,046	14.3

¹ : μ SA = micropolitan statistical area

Source: U.S. Department of Commerce, U.S. Census Bureau – American Community Survey 5-year Estimates, 2007-2011.

Table 4-8 Minority Populations: Marshall USARC Region and Larger Regions, 2011.

Jurisdiction	Percent Minority	Percent Black or African American	Percent American Indian/Alaska Native	Percent Asian	Percent Native Hawaiian or Other Pacific Islander	Percent Some Other Race	Two or More Races	Percent Ethnicity Hispanic/Latino
Marshall	45.4	41.7	0.2	0.8	0.0	2.3	0.4	16.4
Marshall μ SA	26.4	22.7	0.1	0.6	0.0	1.8	1.2	11.0
Texas	25.9	11.8	0.5	3.9	0.1	7.5	2.2	37.6
United States	25.8	12.6	0.8	4.8	0.2	4.8	2.7	16.4

¹ : μ SA = micropolitan statistical area

Source: U.S. Department of Commerce, U.S. Census Bureau – American Community Survey 5-year Estimates, 2007-2011.

4.2.6.1.5 Protection of Children

On April 21, 1997, 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.

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.

Within a 1-mile radius of the Marshall USARC, there is an elementary school, a high school, eight daycare centers, one middle school, and four parks.

4.2.6.2 Consequences

Potential socioeconomic impacts are considered significant if the proposed action would cause:

- Substantial gains or losses in population and/or employment; or
- Disequilibrium in the housing market, such as severe housing shortages or surpluses, resulting in substantial property value changes.

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

After performing an analysis of socioeconomics, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.6.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.2.6.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. The Marshall USARC has closed and its operations have relocated to a new AFRC with a field maintenance shop in Tyler, Texas. The USACE, Mobile District prepared separate NEPA documentation for construction and operation of the new AFRC in Tyler, Texas (USACE 2009). The 63d RSC prepared NEPA documentation for relocation of the unit to the new AFRC. During caretaker status, there would no longer be daily discretionary spending (i.e. grocery shopping, gas purchases) by USARC employees in the immediate vicinity of the property. However, any impacts from decreased spending the area would be negligible because there is only one full-time employee and 42 reservists that train at the USARC one weekend per month. There are no anticipated impacts to the safety of children during the caretaker status phase of the property. Appropriate Federal and state safety measures and health regulations would be followed to protect the health and safety of all residents as well as workers.

Indirect Impacts. Under this alternative, there would be benefits foregone (minor short-term adverse indirect impact) from the delayed reuse of the property. The city would lose potential immediate economic benefits from possible employment and sales from the reuse of the property. Potential private developers of the property would lose the immediate redevelopment opportunity. Residents of the surrounding community would lose any potential immediate employment opportunities that may be created through the renovation phase of the property.

4.2.6.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. Recognizing the uncertainty that accompanies reuse planning, instead of trying to predict exactly what will occur at the site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities, provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

The Economic Impact Forecast System (EIFS) model, developed by the USACE Construction Engineering Research Laboratory, was used to assess the impacts of this alternative on the economy of the ROI. To complete the EIFS model, sample reuse intensity scenarios and costs were estimated for the alternative. The cost used in this analysis is only an estimate of a possible development scenario and is subject to change depending on the final design. For purposes of the analysis, the demolition and new construction costs were analyzed in EIFS because it would result in the greatest impacts to the economy. Rough estimates for demolition and construction of a school and/or institutional space with a maximum of 120,000 SF ranged from \$10-18 million (RSMMeans 2013). The estimated construction period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 2.27.

Table 4-9 provides the estimated direct, indirect, and total annual economic impacts of renovation activities on business volume, income, and employment, as estimated by the EIFS model. Table 4-9 also provides the indirect impacts on business volume, income, and employment because of the initial direct impacts of the construction activities. Appendix C contains a description of the EIFS model and the EIFS reports on impacts.

The EIFS model also includes a Rational Threshold Value (RTV) profile used in conjunction with the forecast models to assess the degree of the impacts of an activity for a specific geographic area. These impacts would be realized over the length of the construction period. The increase in business volume, income, and employment includes capital expenditures, income, and labor directly associated with the construction activity. Appendix C contains a description of the RTV. Table 4-9 provides the RTV associated with each of the economic impacts resulting from the renovation activity. If the RTV for a variable is less than the historic maximum annual deviation for that variable, then the regional economic impacts are not considered significant. Thus, the RTV for each of the variables was found to be considerably less than the respective regional RTV.

Table 4-9 Estimated Annual Economic Impacts from Alternative 3 – Educational Facility					
Variable	Direct Impacts	Indirect Impacts	Total	Project Rational Threshold Value	Historic Positive Rational Threshold Value
Annual Construction Impacts²					
Sales (Business) Volume	\$10,382,040	\$13,185,190	\$23,567,230	1.6	8.5
Income	\$6,276,552	\$1,917,789	\$8,194,789	0.7	7.3
Employment	196	53	249	0.9	5.9
² 2014 Dollars. <i>Source: Economic Impact Forecast System, U.S. Army Corps of Engineers, Construction Engineering Research Laboratory.</i>					

Impacts from Construction

There would be minor short- term beneficial impacts to the economy from the creation of new temporary construction jobs in the local area during the demolition and construction period of the project.

There would also be additional negligible short- term economic impacts to the local jurisdictions and the state from the revenues generated from the demolition sales taxes on materials sold to builders (NAHB 2009).

There would be negligible short-term impacts to the local population, which includes minority and low income individuals, during the construction phase of the project. During the renovation or demolition and construction phase, there may be increased noise, fugitive dust, and traffic congestion around the property. The degree of impact would be greater if the USARC is demolished and a new building constructed. Construction standards would be in place to minimize impacts. Any impacts to the local population would be temporary.

There are no anticipated impacts to the safety of children during the construction phase of the project. Appropriate Federal and state safety measures and health regulations would be followed to protect the health and safety of all residents as well as workers. Safety measures, barriers, and “no trespassing” signs would be placed around the perimeter of construction sites to deter children from playing in these areas, and construction vehicles and equipment would be secured when not in use.

Impacts from Closure and Reuse

The Marshall USARC has closed and its operations have relocated to a new AFRC with a field maintenance shop in Tyler, Texas. The U.S. Army Corps of Engineers (USACE), Mobile District prepared separate NEPA documentation for construction and operation of the new AFRC in Tyler, Texas (USACE 2009). The 63d RSC prepared NEPA documentation for relocation of the unit to the new AFRC. There would negligible impacts from the closure of the USARC on the local economy. There would no longer be daily discretionary spending by USARC employees and reservists in the immediate vicinity of the property. However, any impacts from decreased spending the area would be negligible because there is only one full-time employee and 42 reservists one weekend per month.

Under Alternative 3, minor long-term direct economic impacts would be realized by the regional and local economy during the reuse. Educational reuse of the property would create job opportunities for local workers mainly in the educational services sect. There would not be any impacts to local spending or housing from the additional long-term workers. It is anticipated that no workers would relocate. Local workers would be utilized from within the region.

There would also be additional long-term economic impacts to the local jurisdictions and the state from the revenues generated from the reuse of a new building. The state would benefit from the additional tax revenue generated during the renovation phase.

There is the potential for negligible impacts to public services (i.e. police, fire, and hospital). The construction of an educational facility is not expected to create an influx of people from outside or within the region. However, there may be additional people working and commuting to the site. The reuse may change the number of police and fire response calls and times of calls to that location. The city has adequate staff and resources to accommodate any anticipated changes. There would be minor impacts to educational services. The reuse as a school would provide additional opportunities for educational or vocational services to the surrounding population.

There would be negligible to minor short-term and long-term impacts to the local population, which includes minority and low income individuals, during the construction and reuse of the site. During the reuse, a new educational building would potentially would bring in jobs and additional revenue and provide additional opportunities for educational or vocational services to the surrounding population. It is not anticipated that impacts would be any greater or more severe on minorities or individuals below the poverty line than non-minorities and those above the poverty line. There are no anticipated impacts to the safety of children during the reuse of the project.

Indirect Impacts. Employment generated by construction activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4-9. The indirect economic impacts of the proposed construction activities on business volume, income, and employment are also provided in Table 4-9. As a result of construction expenditures for materials, supplies, and services, in addition to construction labor wages, the EIFS model estimates an approximate \$13 million increase in indirect business volume; a \$2 million increase in indirect or induced personal income; and an increase of 53 indirect jobs created in the construction, retail trade, service, and industrial sectors. These impacts would be realized during the length of the construction period, and would have non-significant short-term impacts on the regional economy.

4.2.6.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. Recognizing the uncertainty that accompanies reuse planning, instead of trying to predict exactly what will occur at the site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

The cost used in this analysis is only an estimate of a possible development scenario and is subject to change depending on the final design. Using RS Means, costs were estimated to construct a variety of commercial properties. The costs can vary widely depending on the type and quality of materials and the amount of detail in the final project. For purposes of the analysis, the demolition and new construction costs were analyzed in the EIFS model because it would result in the greatest impacts to the economy. Rough estimates for a new commercial development of 120,000 SF could cost up to \$15 million (RSMeans 2013). The estimated construction/renovation period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 2.27.

Table 4-10 provides the estimated direct, indirect, and total annual economic impacts of construction/renovation activities on business volume, income, and employment, as estimated by the EIFS model. Table 4-10 also provides the RTV associated with each of the economic impacts resulting from the renovation activity. The RTV for each of the variables was found to be considerably less than the respective regional RTV, so the regional economic impacts are considered non-significant.

Table 4-10 Estimated Annual Economic Impacts from Alternative 4 - Commercial					
Variable	Direct Impacts	Indirect Impacts	Total	Project Rational Threshold Value	Historic Positive Rational Threshold Value
Annual Construction Impacts¹					
Sales (Business) Volume	\$8,642,308	\$10,975,730	\$19,618,040	1.3	8.5
Income	\$5,218,777	\$1,596,423	\$6,815,199	0.6	7.3
Employment	163	44	207	0.7	5.9
¹ 2014 Dollars					
<i>Source: Economic Impact Forecast System, U.S. Army Corps of Engineers, Construction Engineering Research Laboratory.</i>					

Impacts from Construction

Under Alternative 4, moderate short-term beneficial direct economic impacts would be realized by the regional and local economy during the renovation or demolition and new construction phase of the proposed reuse. Employment generated by construction activities would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies.

There would be minor to moderate short-term beneficial impacts to the economy during the construction of a commercial development on the property by creating new jobs in the local area. The degree of impact would be greatest if the existing USARC is demolished and new construction occurs. Jobs would be created for temporary workers that are part of the construction activity.

There would be additional minor to moderate short-term economic impacts to the local jurisdictions and the state from the revenues generated either from renovation or demolition and new construction of a commercial development. The state would receive additional tax revenue from the taxes on materials sold to builders. The county would benefit from the impact, permit, and other fees paid by the builders and developers.

There is the potential for minor impacts to public services (i.e. police, fire, hospital, and education services) and no impacts to recreation or the safety of children. The city has adequate staff and resources to accommodate any calls for services during the construction phase of the project.

There would be negligible to minor short-term impacts to the local population, which includes minority and low income individuals, during the construction and reuse of the site. Greater impacts would occur if the USARC is demolished and new construction occurs. During the construction, there may be increased noise, fugitive dust, and traffic congestion around the property. Construction standards would be in place to minimize impacts.

Impacts from Closure and Reuse

The Marshall USARC has closed and its operations have relocated to a new AFRC with a field maintenance shop in Tyler, Texas. The USACE, Mobile District prepared separate NEPA documentation for construction and operation of the new AFRC in Tyler, Texas (USACE 2009). The 63d RSC prepared NEPA documentation for relocation of the unit to the new AFRC. There would negligible impacts from the closure of the USARC on the local economy. There would no longer be daily discretionary spending by USARC employees and reservists in the immediate vicinity of the property. However, any impacts from decreased spending the area would be negligible because there is only one full-time employee and 42 reservists one weekend per month.

There would be minor to moderate long-term beneficial impacts to the economy by creating new jobs in the local area. During and following construction, permanent jobs would be created mainly in the services sector. For example, if a restaurant was built on the site, there would be additional staff hired to manage, cook, and serve at the restaurant. The number of jobs created would depend on the types and quantity of businesses on site. The degree of impacts would be greater if the existing USARC building is demolished and full build out of the site occurs.

There would not be any impacts to local spending, housing, or community services from the additional short- and long-term workers. It is anticipated that no workers would relocate. Local workers from within the ROI would be utilized for the permanent jobs.

There would be additional minor to moderate long-term economic impacts to the local jurisdictions and the state. In the long-term, if the development sells goods or services that local and state taxes are collected on, the city and the state would receive tax revenue from the sale. There would also be long-term benefits to the county from annual property tax payments that businesses would pay.

There is the potential for minor impacts to public services (i.e. police, fire, hospital, and education services) and no impacts to recreation or the safety of children. The construction of a commercial development is not expected to create an influx of people from outside or within the region. However, there may be additional people working and commuting to the site. The reuse may change the number of police and fire response calls and times of calls to that location. The city has adequate staff and resources to accommodate any anticipated changes.

There would be negligible to minor long-term impacts to the local population, which includes minority and low income individuals. During the reuse, a new commercial development potentially would bring in jobs and additional revenue. It is not anticipated that impacts would be any greater or more severe on minorities or individuals below the poverty line than non-minorities and those above the poverty line. Any impacts to the local population would be temporary.

Indirect Impacts. Employment generated by construction activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4-10. The indirect economic impacts of the proposed construction activities on business volume, income, and employment are also provided in Table 4-10. As a result of construction expenditures for materials, supplies, and services, in addition to construction labor wages, the EIFS model estimates an approximate \$11 million increase in indirect business volume; a \$2 million increase in indirect or induced personal income; and an increase of 44 indirect jobs created in the construction, retail trade, service, and industrial sectors. These impacts would be realized during the length of the construction period, and would have non-significant short-term impacts on the regional economy.

4.2.6.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. Recognizing the uncertainty that accompanies reuse planning, instead of trying to predict exactly what will occur at the site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

The cost used in this analysis is only an estimate of a possible development scenario and is subject to change depending on the final design. Using RS Means and the National Association of Homebuilder's data, costs were estimated to construct a variety of residential housing options. The costs can vary widely depending on the type and quality of materials and the amount of detail in the final project. For purposes of the analysis, the demolition and new construction costs were analyzed in the EIFS model because it would result in the greatest impacts to the economy. Rough estimates for a 30 unit new residential construction, which is the maximum

that would be allowed on the site, ranged from \$4-15 million (RSMMeans 2013, Hawkins Research Inc. 2014). The estimated renovation period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 2.27.

Table 4-11 provides the estimated direct, indirect, and total annual economic impacts of renovation activities on business volume, income, and employment, as estimated by the EIFS model. Table 4-11 also provides the RTV associated with each of the economic impacts resulting from the renovation activity. The RTV for each of the variables was found to be considerably less than the respective regional RTV, so the regional economic impacts are considered non-significant.

Table 4-11 Estimated Annual Economic Impacts from Alternative 5 - Residential					
Variable	Direct Impacts	Indirect Impacts	Total	Project Regional Threshold Value¹	Historic Positive Regional Threshold Value¹
Annual Construction Impacts²					
Sales (Business) Volume	\$4,601,716	\$5,844,179	\$10,445,900	0.7	8.5
Income	\$2,774,001	\$850,037	\$3,624,038	0.33	7.3
Employment	87	24	110	0.39	5.9
¹ Rational Threshold Value. ² 2013 Dollars. <i>Source: Economic Impact Forecast System, U.S. Army Corps of Engineers, Construction Engineering Research Laboratory.</i>					

Impacts from Construction

Under Alternative 5, moderate short-term beneficial direct economic impacts would be realized by the regional and local economy during the renovation or demolition and new construction phase of the proposed reuse. Employment generated by construction activities would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies.

There would be minor to moderate short-term beneficial impacts to the economy during the construction residences on the property by creating new jobs in the local area. Greater impacts would occur if the USARC building is demolished and new residential buildings constructed. Most of the jobs would be for temporary workers that are part of the construction activity.

There would not be any impacts to local spending, housing, or community services from the additional short and long-term workers. It is anticipated that no workers would relocate. Local workers would be from within the ROI.

There would be additional short term economic impacts to the local jurisdictions and the state from the revenues generated from the renovation of the building. The state would receive additional tax revenue from the taxes on materials sold to builders. The county would benefit from the impact, permit, and other fees paid by the builders and developers.

Impacts to public services (i.e. police, fire, and hospital services) and the safety of children would be the same as those described under Alternative 4. There would be minor short-term adverse impacts to the local population, which includes minority and low income individuals, during the construction and reuse of the site. There would be increased noise from construction operations and workers; fugitive dust emissions during building construction and demolition activities; and an increase in traffic congestion from commuting construction workers and construction equipment. It is not anticipated that impacts would be any greater or more severe on minorities or individuals below the poverty line than non-minorities and those above the poverty line. Construction would occur during normal business hours and standards would be in place to minimize dust. Any impacts to the local population would be temporary and during the construction phase of the project.

Impacts from Closure and Reuse

The Marshall USARC has closed and its operations have relocated to a new AFRC with a field maintenance shop in Tyler, Texas. There would negligible impacts from the closure of the USARC on the local economy. There would no longer be daily discretionary spending by USARC employees and reservists in the immediate vicinity of the property. However, any impacts from decreased spending the area would be negligible because there is only one full-time employee and 42 reservists one weekend per month. The USACE, Mobile District prepared the NEPA documentation for construction and operation of the new AFRC.

There would be minor to moderate long term beneficial impacts to the economy from the construction of residences on the property. Jobs would be created for real estate agents, brokers, and various other workers that would provide services to home builders and buyers.

There would be additional long term economic impacts to the local jurisdictions from the revenues generated from the reuse of the building. Residents would pay yearly property tax payments.

Impacts to public services (i.e. police, fire, and hospital services) and the safety of children would be the same as those described under Alternative 4. There would be minor short-term adverse impacts to the local population, which includes minority and low income individuals. During the reuse, there may be long-term adverse impacts to local populations from increased vehicle traffic near the new residential complex. Any changes to traffic patterns would be negligible and limited to peak commuting times. There would be long-term negligible beneficial impacts to housing resources. At the time of this writing, there are 172 homes in Marshall that are listed for sale. There were a limited number of multi-family properties available. The addition of homes in the region would create additional housing opportunities for county residents. Greater benefits to the local community may occur if multi-family units are constructed.

Indirect Impacts. Employment generated by construction activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4-11. The indirect economic impacts of the proposed construction activities on business volume, income, and employment are also provided in Table 4-11. As a result of construction expenditures for materials, supplies, and services, in addition to construction labor wages, the EIFS model estimates an approximate \$6 million increase in indirect business volume; a \$0.9 million increase in indirect or induced personal income; and an increase of 24 indirect jobs created in the construction, retail trade, service, and industrial sectors. These impacts would be realized during the length of the construction period, and would have non-significant short-term impacts on the regional economy.

4.2.7 Transportation

4.2.7.1 Affected Environment

This section describes the existing transportation conditions at and surrounding the Marshall USARC.

4.2.7.1.1 Roadways and Traffic

The Marshall USARC is located on East Pinecrest Drive (State Highway 43) between U.S. Highway 59 and Maverick Drive. U.S. Highway 59 is a major north-south transportation artery in the central United States. It is one of the major links in the nation between the Texas Gulf Coast and Mexico (LRA 2007). The annual average daily traffic (AADT) volume in 2012 on U.S. Highway 59 at State Highway 43 was 22,000 vehicles per day (TXDOT 2013).

North of State Highway 43, U.S. Highway 59 has three northbound lanes and three southbound lanes with a continuous left turn lane. South of State Highway 43, U.S. Highway 59 has two northbound lanes and two southbound lanes separated by a grass median. The level of service (LOS) rating north of State Highway 43 is B (see Table 4-12 for LOS rating definitions), and the LOS rating for U.S. Highway 59 south of State Highway 43 is C (TXDOT 2014b).

A	Traffic flows at or above the posted speed limit and all motorists have complete mobility between lanes.
B	Slightly congested, with some impingement of maneuverability. Two motorists might be forced to drive side by side, limiting lane changes.
C	Ability to pass or change lanes is not assured. Most experienced drivers are comfortable, and posted speed is maintained, but roads are close to capacity. This is often the target LOS for urban highways.
D	Typical of an urban highway during commuting hours. Speeds are somewhat reduced, motorists are hemmed in by other cars and trucks.

E	Flow becomes irregular and speed varies rapidly, but rarely reaches the posted limit. On highways this is consistent with a road over its designed capacity.
F	Flow is forced; every vehicle moves in lockstep with the vehicle in front of it, with frequent drops in speed to nearly zero mph. A road for which the travel time cannot be predicted

Texas State Highway 43 (East Pinecrest Drive) has two eastbound lanes and two westbound lanes with a continuous left turn lane in front of the USARC property. AADT on State Highway 43 (East Pinecrest Drive) adjacent to the USARC property is 9,600 vehicles, and the LOS rating is B (TXDOT 2014b).

Maverick Drive to the west of the property is a two-lane north-south local street that serves as the primary means of access to the Marshall High School campus. Traffic in the vicinity of the property would be described as moderately heavy from 7:30 to 8:00 am and from 3:00 to 3:30 pm when Marshall High School is in session. During most hours of the day and evening traffic in the vicinity of the USARC is light to moderate (LRA 2007).

Before closure of the Marshall USARC, daily vehicle traffic to the facility included approximately 1 full-time employee who commuted to the facility daily and approximately 42 persons who attended drills on one weekend per month. According to the Institute of Transportation Engineers, a single tenant office building generates approximately four trip ends per employee (Table 4-12), the total number of trips entering and exiting a site during that designated time (ITE 2008). Before closure of the USARC, it generated approximately four trip ends per day from the full-time employee and an additional 168 trip ends per day by reservists on one weekend per month.

4.2.7.1.2 Public Transportation

The city of Marshall community is served by rail, interstate buses, one taxi company, a general aviation airport with a 5,000 foot runway (Harrison County Airport), and a demand-responsive public transit system that handles pick-ups on an appointment basis (LRA 2007).

Greyhound Bus service operates out of the Pony Express Travel Center truck stop on Interstate 20, approximately 2.6 miles south of the USARC property. Amtrak Train service operates out of a station in downtown Marshall, approximately 1.8 miles northwest of the USARC. Shreveport Regional Airport is approximately 25 miles east of the property and accommodates four passenger and five air cargo carriers on two runways (Shreveport Regional Airport 2014). The airport offers domestic flights and serves the northwestern Louisiana, northeastern Texas, southeastern Oklahoma, and southwestern Arkansas regions. The Dallas/Fort Worth International Airport is approximately 150 miles west of Marshall.

4.2.7.2 Consequences

Potential impacts to transportation resources are considered significant if the proposed action would:

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

After performing an analysis of transportation resources, it was determined that no significant impacts would occur under any alternative. Detailed analysis of each alternative is described in the subsections below.

4.2.7.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for transportation resources are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for transportation resources are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.2.7.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Maintenance activities are expected to continue for the grounds and remaining asphalt areas. Negligible beneficial impacts to the community would result from the reduction in employees commuting to the USARC.

Indirect Impacts. No indirect impacts to transportation resources are anticipated because maintenance activities on the property are expected to continue. There would be no changes to transportation resources under this alternative.

4.2.7.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. During the construction or renovation phase, there would be minor direct adverse impacts to transportation under this alternative. A short-term increase in vehicular traffic on the local roads around the site would occur during this phase of the project. There would be commuting construction workers and more trucks and heavy equipment traffic delivering and hauling supplies.

The USARC property can currently only be entered from East Pinecrest Drive (State Highway 43). It is possible that the new development may use the same access points; however, it is also possible that the property could be accessed from other points on this same road or along Maverick Drive (Figure 1-2).

Reuse of the Marshall USARC would result in minor to moderate adverse impacts to local transportation patterns depending on the final design and type of educational facility development. There would be negligible impacts to public transportation because traffic generated under this alternative would be mostly local and public transportation is not widely used within Marshall.

Potential educational facility reuses could include, but are not limited to, primary and secondary schools, trade schools, business schools, colleges or universities, convention facilities, churches, libraries, and museums. Under a medium-high intensity level (0.30-0.70 FAR) reuse of the property, the floor area for an educational facility development would be between 50,000 and 116,000 SF with a maximum of 600 users (students and employees).

In the long-term, the reuse as an educational facility would increase traffic and public transportation use in the area. Impacts would be minor to moderate depending on the type and final square footage of the development. An educational facility would generate between approximately 1,500 and 3,100 trip ends per day (ITE 2008; ITE 2012) if the existing buildings were demolished and the maximum allowed building area (116,000 SF) was constructed. If the existing USARC buildings are renovated and reused, there would be 5,800 SF of floor area, resulting in approximately 75 to 157 trip ends per day. For comparison, there were approximately 4 trip ends daily and an additional 168 trip ends one weekend per month for training events before closure of the USARC.

Table 4-13 compares trip ends generated under Alternative 3 compared with those of the No Action Alternative. The roads adjacent and near the USARC would be able to accommodate the increase in traffic because they are major thoroughfares in a major activity center of the city of Marshall (LRA 2007). Traffic calming measures may be required under this alternative. However, State Highway 43 is a wide, 4-lane thoroughfare with a continuous left turn lane in front of the USARC property and an LOS B rating (traffic flows freely).

Indirect Impacts. No indirect impacts to transportation are anticipated because of the small scale of this project in relation to the highly developed transportation infrastructure in the region.

Table 4-13 Summary of Weekday Daily Trip Generation Rates by Land Use Type	
Land Use	Average (TE/KSF)¹
Education – High School	13
Education - Community College	27
Museum	12
Recreational Community Center	23
Church/Synagogue	9
Automobile Care Center	16
New Car Sales	32
Automobile Parts Sales	62
Gasoline/Service Station	169
Bank (Walk-in)	156
Bank (Drive-in)	148
General Office	11
Single-tenant Office Building	4 (TE/number of employees)
Government Office Complex	28
Hotel	8 (TE/number of rooms)
Movie Theater	78
Health Club	33
Clinic	31
Medical Dental Office	36
Restaurant – Fast Food	496
Restaurant – Sit Down	127
Shopping Center	43
Discount Supermarket	97
Drug Store w/ Drive-Thru	88
Warehousing	4
Residential – Single Family Homes	10 (TE/dwelling unit)
Residential – Condominium/townhouse	6 (TE/dwelling unit)
¹ Trip-End (the origin or destination of a trip)/units of 1,000 square feet NA – Not Available <i>Source: 8th Edition Institute of Transportation Engineers Trip Generation Report 2008; ITE 2012; Cambridge Systematics, Inc. 2011.</i>	

	Estimated Daily Trip Ends¹ (Renovation of Exiting Buildings)	Estimated Daily Trip Ends¹ (Demolition and Construction)	East Pinecrest Drive (Texas State Highway 43) AADT²	U.S. Highway 59 AADT²
No Action Alternative	4 (plus 168 one weekend per month)		9,600 vehicles	22,000 vehicles
Caretaker Status Alternative	0			
Alternative 3 – Educational Reuse	75 to 157	1,500 and 3,100		
Alternative 4 – Commercial Reuse	23 to 2,900	Approx. 5,000		
Alternative 5 – Residential Reuse	35 to 58	300 to 500		
¹ Trip ends: the total number of trips entering and exiting a site. ² AADT: Annual Average Daily Traffic Source: Institute of Transportation Engineers. 2008. Trip Generation Rates from the 8 th Edition ITE Trip Generation Report Series.				

4.2.7.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. Short-term and property access impacts would be similar to those described under Alternative 3. During the construction or renovation phase, there would be minor direct adverse impacts to transportation under this alternative. A short-term increase in vehicular traffic on the local roads around the site would occur during this phase of the project. There would be commuting construction workers and more trucks and heavy equipment traffic delivering and hauling supplies.

Reuse of the Marshall USARC would result in minor to moderate adverse impacts to transportation patterns depending on the final design and type of commercial development. There would be negligible impacts to public transportation because traffic generated under this alternative would be mostly local and public transportation is not widely used within Marshall.

Potential commercial reuses could include, but are not limited to, retail, banks, hotels, restaurants, community centers, amusement enterprises, theaters, child care, repair services, automobile sales and service, parking garages or lots, storage units, warehousing, or office space (local government, organizations, or private business). Under a medium-high intensity level (0.30-0.70 FAR) reuse of the property, the floor area for a commercial facility development would be between 50,000 and 116,000 SF, with a maximum of 600 users (customers and employees).

In the long-term, commercial reuse would increase traffic use in the area. Impacts would be minor to moderate depending on the type and final square footage of the development. A typical suburban commercial development scenario would generate approximately 5,000 trip ends per day (ITE 2008; ITE 2012) if the existing buildings were demolished and the maximum allowed building area (116,000 SF) was constructed. If the existing USARC buildings are renovated and reused, there would be 5,800 SF of floor area, resulting in approximately 23 to 2,900 trip ends per day. For comparison, there were approximately 4 trip ends daily and an additional 168 trip ends one weekend per month for training events before closure of the USARC.

Table 4-13 compares trip ends generated under Alternative 4 compared with those of the No Action Alternative. The roads adjacent and near the USARC would be able to accommodate the increase in traffic because they are major thoroughfares in a major activity center of the city of Marshall (LRA 2007). Traffic calming measures may be required under this alternative. However, State Highway 43 is a wide, 4-lane thoroughfare with a continuous left turn lane in front of the USARC property and an LOS B rating (traffic flows freely).

Indirect Impacts. No indirect impacts to transportation are anticipated because of the small scale of this project in relation to the highly developed transportation infrastructure in the region.

4.2.7.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. During the construction or renovation phase, there would be minor direct adverse impacts to transportation under this alternative. A short-term increase in vehicular traffic on the local roads around the site would occur during this phase of the project. There would be commuting construction workers and more trucks and heavy equipment traffic delivering and hauling supplies.

Reuse of the Marshall USARC would result in negligible to minor adverse impacts to transportation patterns depending on the final design and type of residential development. There would be negligible impacts to public transportation because traffic generated under this alternative would be mostly local and public transportation is not widely used within Marshall.

Potential residential reuses allowed under zoning restrictions include, but are not limited to, single family dwellings, duplexes, triplexes, quadruplexes, townhomes, and group care homes. Under a medium intensity level (0.10-0.30 FAR) reuse of the property, the floor area for a residential development would be between 16,550 and 50,000 SF, with a maximum of 30 residential units.

In the long-term, residential reuse would increase traffic use in the area over baseline conditions. Impacts would be negligible to minor depending on the type and final square footage of the development. A residential development would generate between approximately 300 to 500 trip ends per day (ITE 2008; ITE 2012) if the existing buildings were demolished and the maximum allowed building area (50,000 SF) was constructed. If the existing USARC buildings are renovated and reused, there would be 5,800 SF of floor area, resulting in approximately 35 to 58 trip ends per day. For comparison, there were approximately 4 trip ends daily and an additional 168 trip ends one weekend per month for training events before closure of the USARC.

Table 4-13 compares trip ends generated under Alternative 4 compared with those of the No Action Alternative. The roads adjacent and near the USARC would be able to accommodate the increase in traffic because they are major thoroughfares in a major activity center of the city of Marshall (LRA 2007). Traffic calming measures may be required under this alternative.

However, State Highway 43 is a wide, 4-lane thoroughfare with a continuous left turn lane in front of the USARC property and an LOS B rating (traffic flows freely).

Indirect Impacts. No indirect impacts to transportation are anticipated because of the small scale of this project in relation to the highly developed transportation infrastructure in the region.

4.2.8 Water Resources

4.2.8.1 Affected Environment

4.2.8.1.1 Floodplains/Coastal Barriers and Zones

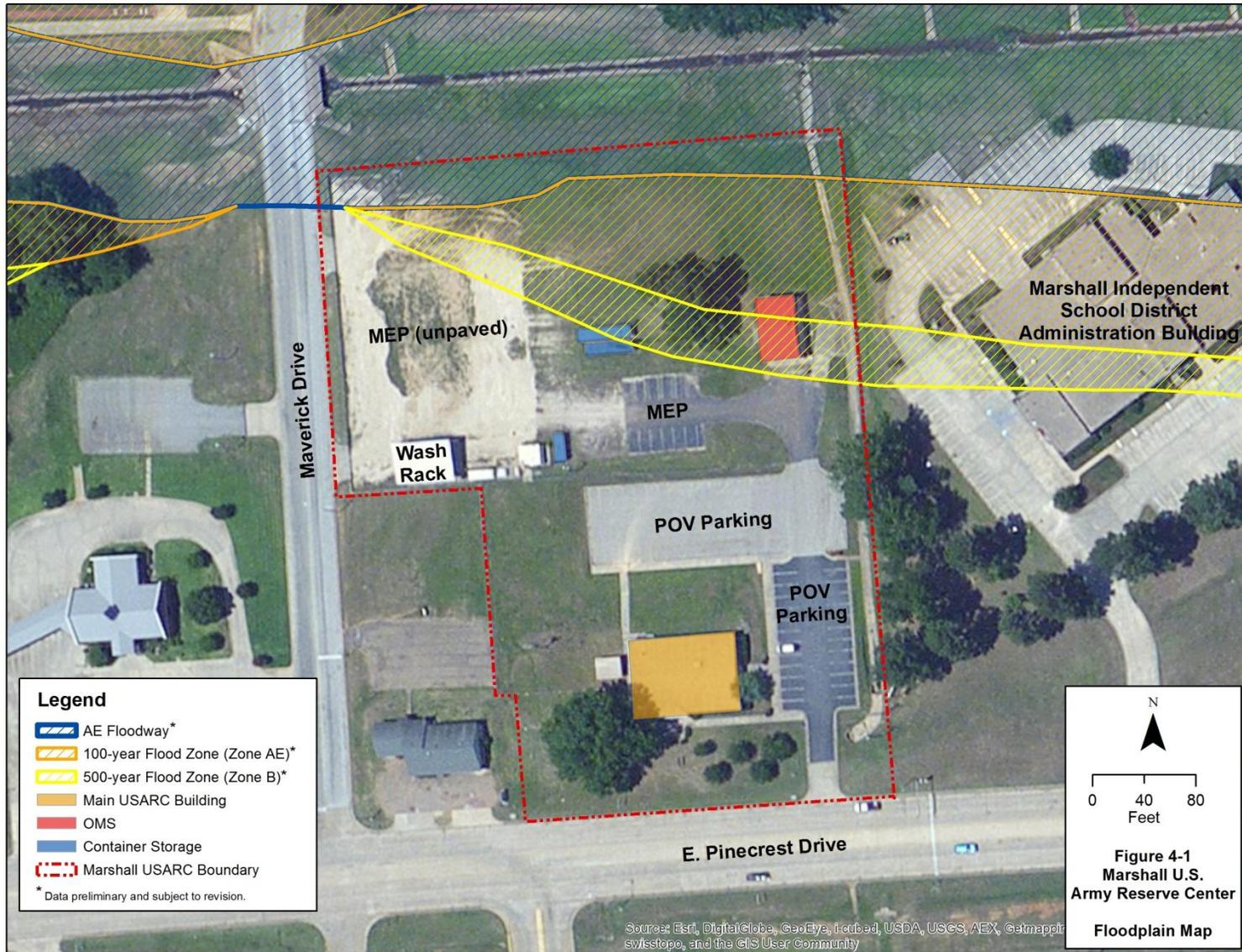
According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Community Panel 4803190005C, 0.59 acre of the Marshall USARC property lies within a 100-year flood zone (Zone AE) and 0.33 acre lies within a 500-year flood zone (Zone B) (Figure 4-1). Additionally, based on FEMA's preliminary digital FIRM for Harrison County, Texas, 0.28 acre of the Marshall USARC property is included in the AE Floodway for Turtle Creek (FEMA 2011) (Figure 4-1). Turtle Creek is located approximately 60 feet north of the Marshall USARC property. This preliminary digital FIRM for Harrison County, Texas was not finalized at the time of this analysis and is subject to revision. The preliminary digital FIRM is anticipated to be finalized and effective in the third quarter of 2014.

The City of Marshall is a participating community in FEMA's National Flood Insurance Program (NFIP) (FEMA 2014b). As such, the City of Marshall enforces sound floodplain management standards through adoption and enforcement of ordinances that meet or exceed FEMA requirements to reduce the risk of flooding. Chapter 7, Article IV of the City of Marshall's Code of Ordinances contains regulations designed to minimize flood losses (City of Marshall 2012). Additionally, a development permit is required to ensure that proposed development projects within high-risk flood areas (Zone AE) meet the requirements of the NFIP and the City of Marshall's Code of Ordinances.

Homes and buildings in high-risk flood areas (Zone AE) with mortgages from federally regulated or insured lenders are required by the NFIP to have flood insurance (FEMA 2014a). Homes and buildings located in moderate-to-low risk areas (Zone B) that have mortgages from federally regulated or insured lenders are typically not required to have flood insurance, but flood insurance is typically highly recommended. A lender can require flood insurance, even if it is not federally required.

When the preliminary digital FIRM for Harrison County is finalized and placed into effect, certain regulations pertaining to the development of the portion of the Marshall USARC property contained within the AE Floodway will apply. These regulations will prohibit encroachment activities within the floodway including fill, new construction, substantial improvements, and other development unless it has been demonstrated through hydrologic and hydraulic analyses that the proposed encroachment would not result in any increase in flood levels (FEMA 2012). The City of Marshall is responsible for reviewing and maintaining documentation demonstrating that any permitted floodway encroachment meets NFIP requirements provided that the City of Marshall first applies for a conditional FIRM and floodway revision through FEMA (City of Marshall 2012). As such, a No-rise Certification for floodways may be used to document the analyses (FEMA 2012).

Additionally, EO 11988, Floodplain Management, requires Federal agencies to take actions to minimize occupancy of and modification to floodplains. Therefore, in consideration of EO 11988, Army property conveyance documents will notify property transferees of their obligation to adhere to applicable restrictions on the property imposed by federal, state, or local floodplain regulations.



4.2.8.2 Consequences

The following thresholds were used in this document to determine if an impact to water resources would be significant:

- USACE has authority for delineating jurisdictional wetlands and evaluating wetlands impacts not avoidable under Section 404 of the CWA. Impacts would be significant if they violate Federal or state surface water protection laws.
- Impacts constitute a substantial risk to aquatic animals and/or humans or contamination poses secondary health risks during the project life.
- Impacts would eliminate or sharply curtail existing aquatic life or human uses dependent on in-stream flows or water withdrawals during the project life.
- Impacts would place within a 100-year flood hazard area structures which violate Federal, State or local floodplain regulations; or
- Impacts would expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

4.2.8.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for water resources are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for water resources are anticipated. Because the Marshall USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.2.8.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. No direct impacts to water resources are anticipated under Alternative 2. Although the Marshall USARC would close and personnel would be realigned, there would be no changes to site conditions. No demolition or construction activities would occur.

Indirect Impacts. No indirect impacts to water resources are anticipated under Alternative 2. Although the Marshall USARC would close and personnel would be realigned, there would be no changes to site conditions. No demolition or construction activities would occur.

4.2.8.2.3 Alternative 3 – Traditional Army Disposal and Educational Reuse

Direct Impacts. There would be the potential for minor short- and long-term adverse direct impacts to floodplains and floodways under this alternative. The reuse of the property may include either the renovations of existing buildings, demolition of existing buildings, or new construction. Additionally, sediment runoff or erosion could occur as a result of stormwater runoff during the construction or demolition period. However, these impacts would be temporary and minimized with the use of BMPs and by complying with federal, state, and local regulations.

Should new buildings or structures be constructed in the floodplain or floodway on the Marshall USARC property, minor long-term adverse direct impacts could occur as floodplain storage capacity and flood flow paths on the Marshall USARC property would potentially be reduced.

However, all construction activities under this alternative would comply with applicable federal, state, and local floodplain management regulations, and impacts would be minor.

Indirect Impacts. There would be potential for negligible long-term adverse indirect impacts to floodplains under this alternative. However, all construction activities under this alternative would comply with applicable federal, state, and local floodplain management regulations and impacts would be minor.

4.2.8.2.4 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Direct Impacts. There would be the potential for minor short- and long-term adverse direct impacts to floodplains and floodways under this alternative. Direct impacts to floodplains and floodways under Alternative 4 would be similar to those under Alternative 3.

Indirect Impacts. There would be potential for negligible long-term adverse indirect impacts to floodplains under this alternative. Indirect impacts to floodplains and floodways under Alternative 4 would be similar to those under Alternative 3.

4.2.8.2.5 Alternative 5 – Traditional Army Disposal and Residential Reuse

Direct Impacts. There would be the potential for minor short- and long-term adverse direct impacts to floodplains and floodways under this alternative. Direct impacts to floodplains and floodways under Alternative 5 would be similar to those under Alternative 3.

Indirect Impacts. There would be potential for negligible long-term adverse indirect impacts to floodplains under this alternative. Indirect impacts to floodplains and floodways under Alternative 5 would be similar to those under Alternative 3.

4.3 Cumulative Effects

The cumulative impact analysis evaluates the incremental effects of implementing any of the alternatives when added to past, present, and reasonably foreseeable future USAR actions at the Marshall USARC and the actions of other parties in the surrounding area, where applicable. The cumulative impact analysis has been prepared at a level of detail that is reasonable and appropriate to support an informed decision by the USAR in selecting a preferred alternative. The cumulative impact discussion is presented according to each of the implementation alternatives listed.

The key components of the cumulative impact analysis include the following categories.

Cumulative Impact Analysis Area. The cumulative impact analysis area includes the area that has the potential to be affected by implementation of the proposed action at the Marshall USARC. This includes the installation and the area proximate to the installation boundary and varies by resource category being considered. Analysis areas are defined in Section 4.3.2 for each resource category analyzed in detail.

Past and Present Actions. Past and present actions, other than the proposed action, are defined as actions within the cumulative analysis area under consideration that occurred before or during September 2011 (the original environmental baseline for the EA). These include past and present actions at the property and past and present demographic, land use, and development trends in the surrounding area. In most cases, the characteristics and results of these past and

present actions are described in the Affected Environment sections under each of the resource categories covered in this EA.

The Marshall USARC property was undeveloped until the U.S. government bought the property in 1958 and built the USARC buildings in 1959. Most of the commercial and institutional development surrounding the USARC property occurred between 1963 and 1984, according to historic aerial photographs (USACE 2007). Since 1985, the city of Marshall has experienced an average of approximately 22 acres of land development annually. This total includes approximately 6.6 acres in residential development, 7.3 acres in commercial development, and 7.8 acres of institutional development annually (City of Marshall 2006).

Past uses of the USARC included administrative and educational operations and maintenance and washing of military vehicles. The former occupant of the Marshall USARC, the 721st Engineer Company, relocated to a new AFRC in Tyler, Texas in 2011.

The property within the vicinity of the mall and the high school at U.S. Highway 59 and State Highway 43 (East Pinecrest Drive) is identified as an activity center in Marshall's General Plan because of the major activities that are concentrated in the vicinity of this intersection (City of Marshall 2006). The USARC is located within this activity center. The activity centers identified in the General Plan are expected to remain the focus of most business, employment, and shopping activity in Marshall. A City of Marshall economic goal is to encourage further development with complementary land uses within established activity centers (City of Marshall 2006).

Reasonably Foreseeable Future Actions. Reasonably foreseeable future actions are mainly limited to those that have been approved and that can be identified and defined with respect to timeframe and location.

Reasonably foreseeable future actions that have been identified and considered in the analysis of cumulative impacts, both on the USARC property and off the USARC property, are:

- Continued redevelopment and revitalization of homes, businesses, and government buildings in and around established activity centers, including the vicinity of the mall and the high school at East Pinecrest Drive and Highway 59.
- Improvements to Marshall High School located adjacent and north of the Marshall USARC property, including proposed renovations to Maverick Stadium and renovations and additions to Marshall High School. Renovations to Maverick Stadium, which originally opened in 1980, are estimated at \$5.5 million. The renovations to the high school are estimated at just over \$30 million (Marshall ISD 2014).
- Four Marshall Independent School District proposed development projects, including new elementary schools and additions to existing schools, within a 1.5 radius of the Marshall USARC (Marshall ISD 2014).
- The Texas Department of Transportation will be installing a new traffic light at the intersection of Highway 43 (East Pinecrest Drive) and Highway 59 in 2014 (TXDOT 2014c).
- I-69 is a proposed 1,600-mile national highway connecting Michigan, Indiana, Kentucky, Tennessee, Mississippi, Arkansas, Louisiana and Texas. In Texas, the route for I-69 begins on U.S. Highway 84 in Joaquin and on U.S. Highway 59 in Texarkana and extends to Laredo and the Rio Grande Valley. U.S. Highway 59 lies approximately 0.15 mile east of the Marshall USARC property. I-69 is designated by Congress as a

High Priority Corridor and a Future Interstate Highway (I-69 Advisory Committee 2012).

- The I-69 System (I-369) Harrison County/Marshall Route Study will, with substantial citizen and community participation, determine options for development of I-369 in the Marshall area, with the eventual goal of constructing, designating and signing U.S. Highway 59 as I-369. The study includes two broad options for consideration: 1) the upgrade of existing U.S. Highway 59 through Marshall to an interstate highway (I-369), or 2) construction of I-369/U.S. 59 on a new location and conversion of existing U.S. Highway 59 through Marshall to Business 59. Ultimately, this route study and the working group's efforts will result in the identification of an interstate route option that will then be studied in detail as part of the environmental process. The route study is anticipated to be completed in late fall 2014 (TXDOT 2014a).

4.3.1 Potential Cumulative Impacts

4.3.1.1 No Impacts to Resources

As documented in Section 4.0 of this EA, there are several resource categories that were eliminated from discussion in the cumulative impacts section. The resource categories that are not discussed in detail include:

- Biological Resources;
- Cultural Resources;
- Geology and Soil; and
- Utilities.

4.3.1.2 Alternative 1 – No Action Alternative

No changes to existing baseline conditions are anticipated under the No Action Alternative. Therefore, there are no cumulative impacts under the No Action Alternative, because this alternative has no impacts. However, for the closure action directed by the BRAC Commission, it is noted that for the No Action Alternative, maintenance of current conditions is not feasible because the BRAC actions are federal law.

4.3.1.3 Alternative 2 – Caretaker Status Alternative

Cumulative impacts under Alternative 2 by resource category are as follows:

- **Aesthetic and Visual Resources.** The cumulative impact analysis area for aesthetic and visual resources includes the viewshed around the property. The impacts of the Caretaker Status Alternative when combined with impacts of the past, current, and reasonably foreseeable projects would not cause significant cumulative impacts to the environment. The aesthetics of the area are expected to remain consistent with current conditions.
- **Air Quality.** The cumulative impact analysis area for air quality includes Harrison County, Texas. During implementation of caretaker status, there would be a net decrease in emissions because operations at the property, including heating and cooling, would be reduced. In addition, there would be a reduction of mobile emissions from

government vehicles and POVs because the building would be vacant and there would be no building users. Therefore, there are no anticipated cumulative impacts.

- **Hazardous and Toxic Substances.** The cumulative impact analysis area for hazardous and toxic substances includes a ½-mile radius around the property. Under this alternative, the elimination of a military presence at the site would cause a negligible long-term decrease in hazardous and toxic substances on the property. The impacts of the Caretaker Status Alternative when combined with impacts of the past, current, and reasonably foreseeable activities would not cause significant cumulative impacts to the environment.
- **Land Use.** The cumulative impact analysis area for land use includes a ½-mile radius around the property, which is the approximate boundary of the Marshall High School and mall activity center identified in the City of Marshall General Plan (City of Marshall 2006). There are no anticipated cumulative impacts because there would be no changes to land use or zoning under this alternative.
- **Noise.** The cumulative impact analysis area for noise is the area surrounding the property where noise from the reuse can be heard under normal circumstances. It is likely caretaker activities would result in noise levels below baseline levels. Lower noise levels would occur throughout the period of caretaker status. Any maintenance activities required under caretaker status would be similar to activities currently taking place at the Marshall USARC. These activities when combined with impacts of the past, current, and reasonably foreseeable activities would not cause significant cumulative impacts to the noise environment.
- **Socioeconomics.** The cumulative impact analysis area for socioeconomics includes the Marshall, Texas μSA (Harrison County). Under this alternative, the Marshall USARC would close and relocate its operations to a new AFRC in Tyler, Texas. The USACE, Mobile District prepared separate NEPA documentation for construction and operation of the new AFRC in Tyler, Texas (USACE 2009). The 63d RSC prepared NEPA documentation for relocation of the unit to the new AFRC. During caretaker status, there would no longer be daily discretionary spending by USARC employees in the immediate vicinity of the property. However, any long-term impacts from decreased spending the area would be negligible because there is only one full-time employee and 42 reservists that train at the USARC one weekend per month. There are no anticipated short-term or long-term cumulative impacts.
- **Transportation.** The cumulative impact analysis area for transportation includes a 2.5-mile radius around the property, which is the approximate distance to Interstate 20, a major transportation route south of Marshall. Under this alternative, the elimination of a military presence at the site would cause a long-term decrease in traffic on and around the property. The impacts of the Caretaker Status Alternative when combined with impacts of the past, current, and reasonably foreseeable activities would not cause significant cumulative impacts to the environment.
- **Water Resources.** The cumulative impact analysis area for water resources includes the watershed around the property. Because no demolition or construction would occur on the Marshall USARC property under this alternative, no impacts to water resources are anticipated. The amount of impervious surface and water movement are expected to remain consistent with current conditions.

4.3.1.4 Alternative 3 – Traditional Army Disposal and Educational Reuse

Cumulative impacts under Alternative 3 by resource category are as follows:

- **Aesthetic and Visual Resources.** An educational facility development with new or renovated buildings and landscaping would result in a long-term beneficial impact to the visual character of the landscape associated with this project in combination with other past, present, and reasonably foreseeable future activities such as renovations to Marshall High School and Maverick Stadium. The cumulative impact would be non-significant.
- **Air Quality.** Potential emissions from the proposed demolition of the Marshall USARC and construction of a new community facility or renovation and reuse of the Marshall USARC would be non-significant. The contribution of these non-significant emissions to regional air emissions would not result in a significant cumulative impact because the replacement activity emissions are clearly *de minimis* (Appendix B).
- **Hazardous and Toxic Substances.** Hazardous substance storage, handling, and disposal activities would be in accordance with federal, state, and local requirements and impacts would be minor in combination with other hazardous substance management in the cumulative impact area. Remaining hazardous substances on the property, including ACM, LBP, PCBs, radon, the OWS AST, pesticides, or other hazardous materials would be stored, handled, and disposed of by the transferee in accordance with federal, state, and local requirements, and would not affect the reuse of this property for an educational facility.
- **Land Use.** The reuse as an educational facility would result in a use similar to baseline levels. These activities when combined with impacts of the past, current, and reasonably foreseeable activities such as renovations and additions to the Marshall High School campus would not cause significant cumulative impacts to land use.
- **Noise.** Noise under Alternative 3 would consist of construction noise and privately owned vehicle noise. The surrounding properties have residential, institutional, and commercial land uses, and there are adjacent principal arterial roads. Therefore, the presence of a new educational facility may slightly increase noise levels due to increased traffic volume frequenting the property. However, this in combination with noise from other past, present, and reasonably foreseeable future activities, such as renovations and additions to the Marshall High School campus and construction of the I-69 corridor, would have non-significant cumulative impacts to the noise environment.
- **Socioeconomics.** There would be short-term employment generated by the construction or renovation of the property under this alternative. There would be long-term employment and tax revenue generated by the reuse for an educational facility. Therefore, Alternative 3 would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies. These beneficial impacts combined with the employment and economic opportunities of future development that is expected throughout the region would have non-significant short- and long-term beneficial cumulative impacts to the local and regional community.
- **Transportation.** The reuse of the Marshall USARC as an educational facility would result in a minor to moderate adverse impact to traffic within the analysis area. There would be more traffic compared to current conditions; however, the roads adjacent and

near the USARC would be able to accommodate the increase in traffic. This in combination with traffic from other past, present, and reasonably foreseeable future activities, such as renovations and additions to the Marshall High School campus and construction of the I-69 corridor, would have non-significant cumulative impacts to transportation.

- **Water Resources.** Any construction on the property and in the surrounding area would comply with federal, state, and local requirements for floodplain management. Compliance would ensure any impacts to water resources are not significant.

4.3.1.5 Alternative 4 – Traditional Army Disposal and Commercial Reuse

Cumulative impacts under Alternative 4 by resource category are as follows:

- **Aesthetic and Visual Resources.** Non-significant cumulative impacts to aesthetic and visual resources under Alternative 4 would be similar to those listed under Alternative 3.
- **Air Quality.** Potential emissions from the proposed demolition of the Marshall USARC and construction of a commercial development or renovation and reuse of the Marshall USARC would be non-significant. The contribution of these non-significant emissions to regional air emissions would not result in a significant cumulative impact because the replacement activity emissions are clearly *de minimis* (Appendix B).
- **Hazardous and Toxic Substances.** Hazardous substance storage, handling, and disposal activities would be in accordance with federal, state, and local requirements and impacts would be minor in combination with other hazardous substance management in the cumulative impact area. Remaining hazardous substances on the property, including ACM, LBP, PCBs, radon, the OWS AST, pesticides, or other hazardous materials would be stored, handled, and disposed of by the transferee in accordance with federal, state, and local requirements, and would not affect the reuse of this property for a commercial facility.
- **Land Use.** Non-significant impacts associated with this project in combination with other past, present, and reasonably foreseeable future activities, such as renovations and additions to the Marshall High School campus, would include potential land use changes for new commercial facilities and potentially a higher intensity reuse. These land use changes are compatible with surrounding land uses and zoning ordinances in the city.
- **Noise.** Noise under Alternative 4 would consist of construction noise and privately owned vehicle noise. The surrounding properties have mostly residential, institutional, and commercial land uses. The presence of additional businesses may increase noise levels due to increased traffic volume frequenting the property. Traffic noise would be variable throughout the day with possible increased traffic noise during working and commuting times, in the evenings and on weekends. This, in combination with noise from other past, present, and reasonably foreseeable future activities, this alternative would have non-significant cumulative impacts to the noise environment.
- **Socioeconomics.** There would be short-term employment generated by the construction or renovation of the property under this alternative. There would be long-term employment and tax revenue generated by the reuse for an educational facility. Therefore, Alternative 4 would result in wages paid; an increase in sales (business)

volume; and expenditures for local and regional services, materials, and supplies. These beneficial impacts combined with the employment and economic opportunities of future development that is expected throughout the region would have non-significant short- and long-term beneficial cumulative impacts to the local and regional community.

- **Transportation.** In the long-term, reuse as a commercial development would have minor to moderate impacts resulting from an increase in the traffic volume in the area. Traffic would be variable throughout the day, being potentially higher around peak working commuting times in the morning and evening during the weekday, later in the evening, and on weekends. The roads adjacent and near the USARC would accommodate the increase in traffic. This, in combination with traffic from other past, present, and reasonably foreseeable future activities, such as renovations and additions to the Marshall High School campus and construction of the I-69 corridor, would have non-significant cumulative impacts to transportation.
- **Water Resources.** Any construction on the property and in the surrounding area would comply with federal, state, and local requirements for floodplain management. Compliance would ensure any impacts to water resources are not significant.

4.3.1.6 Alternative 5 – Traditional Army Disposal and Residential Reuse

Cumulative impacts under Alternative 5 by resource category are as follows:

- **Aesthetic and Visual Resources.** Non-significant cumulative impacts to aesthetic and visual resources under Alternative 5 would be similar to those listed under Alternative 3.
- **Air Quality.** Potential emissions from the proposed demolition of the Marshall USARC and construction of a residential development or renovation and reuse of the Marshall USARC would be non-significant. The contribution of these non-significant emissions to regional air emissions would not result in a significant cumulative impact because the replacement activity emissions are clearly *de minimis* (Appendix B).
- **Hazardous and Toxic Substances.** Hazardous substance storage, handling, and disposal activities would be in accordance with federal, state, and local requirements and impacts would be minor in combination with other hazardous substance management in the cumulative impact area. Remaining hazardous substances on the property, including ACM, LBP, PCBs, radon, the OWS AST, pesticides, or other hazardous materials would be stored, handled, and disposed of by the transferee in accordance with federal, state, and local requirements, and would not affect the reuse of this property for residential use.
- **Land Use.** Non-significant cumulative impacts to land use under Alternative 5 would be similar to those listed under Alternative 3.
- **Noise.** Noise under Alternative 5 would consist of construction noise and privately owned vehicle noise. The surrounding properties have mostly residential, institutional, and commercial land uses, and therefore, the presence of additional residential development may increase noise levels due to increased traffic volume frequenting the property. Traffic noise would be variable throughout the day with possible increased traffic noise during working and commuting times. Noise levels would comply with

applicable federal, state, interstate, local, and/or occupational noise control regulations. This, in combination with noise from other past, present, and reasonably foreseeable future activities would have non-significant cumulative impacts to the noise environment.

- **Socioeconomics.** Non-significant cumulative impacts to socioeconomics under Alternative 5 would be similar to those listed under Alternative 3.
- **Transportation.** In the long-term, reuse as a residential development would have negligible to minor impacts resulting from an increase in the traffic volume in the area. Traffic would be variable throughout the day, being potentially higher around peak working commuting times in the morning and evening during the weekday. The roads adjacent and near the USARC would accommodate the increase in traffic. This, in combination with traffic from other past, present, and reasonably foreseeable future activities, such as renovations and additions to the Marshall High School campus and construction of the I-69 corridor, would have non-significant cumulative impacts to transportation.
- **Water Resources.** Any construction on the property and in the surrounding area would comply with federal, state, and local requirements for floodplain management. Compliance would ensure any impacts to water resources are not significant.

4.4 Best Management Practices

As discussed in Sections 4.1 through 4.3 above, no significant adverse or significant beneficial impacts have been identified or are anticipated as a result of implementing any of the proposed action alternatives or the No Action Alternative.

Local, state, and federal regulations for noise, air, water, and soil resources will be adhered to during all phases of construction, as appropriate to minimize impacts associated with implementing the proposed action.

SECTION 5.0 FINDINGS AND CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500), and Environmental Analysis of Army Actions (32 CFR 651). As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the disposal and reuse alternatives, the Caretaker Status Alternative, and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a Finding of No Significant Impact is warranted and preparation of an EIS is not required.

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SECTION 6.0 LIST OF PREPARERS

This EA was prepared under the direction of the 63d RSC and U.S. Army Corps of Engineers. Individuals who assisted in issue resolution and provided guidance for this document are:

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Contractor personnel involved in the development of this EA include the following:

Name	Education and Experience	Primary Responsibilities
Katie Astroth	B.S. Biology and Environmental Biology, M.S. Biology. 5 years of experience in fish and wildlife management, aquatic ecology, and environmental planning.	Parsons Environmental Scientist; key participant in site visit, data collection, analysis, and preparation of EA text and supporting sections.
Susan Bupp	B.A. Anthropology, M.A. Anthropology. 38 years of experience in environmental assessment and impact studies, Section 106 coordination, and cultural resources investigations.	Parsons Cultural Resources Specialist; responsible for preparation of cultural resources affected environment and consequences.
Lee Gerald	M.S. Marine Biology, B.S. Biology. 25 years of experience with environmental assessments, wetland and T&E species assessment and natural resources management.	LG2 Environmental Solutions, Inc. NEPA Project Manager; description of proposed action and alternatives formulation.
Richard Hall	B.S. Environmental Biology, M.S. Zoology. Over 36 years of experience in environmental assessment and impact studies, biological community investigations, and ecosystem restoration.	Parsons Project Manager/Senior Project Planner; data collection and key participant in description of proposed action, alternatives formulation, and related environmental analyses.
Rachael E. Mangum	B.A. Anthropology, M.A., Anthropology. 14 years of experience in cultural resources management under the NHPA and documentation under NEPA.	Parsons Cultural Resources Specialist; responsible for preparation of cultural resources affected environment and consequences.

Name	Education and Experience	Primary Responsibilities
Darren Mitchell	B.S. Biology, M.S. Biology. Over 12 years of experience working on environmental compliance, wildlife management, wetland delineations, and NEPA planning.	Parsons Principal Scientist; key participant in site visit, data collection, analysis, and preparation of EA text and supporting sections.
Amanda Molsberry	B.A. Geography, M.S. Environmental Science and Policy. Over 10 years of experience in conservation design, environmental planning, and socioeconomic analysis.	Parsons Senior Environmental Scientist; data collection, analysis, and key participant in preparation of EA text and supporting sections.
Randy Norris	B.S. Plant and Soil Science, Master of Urban Planning/Environmental Planning. Over 22 years of experience in environmental impact assessment, environmental management, and planning.	Parsons Project Scientist; description of proposed action, alternatives formulation, and environmental impact analyses.
Rebecca Porath	B.S. Fisheries and Wildlife Management, M.S. Zoology. Over 16 years of experience in environmental, biological, and natural resource planning projects.	Parsons Senior Environmental Scientist; data collection, analysis, and key participant in preparation of EA text and supporting sections.

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Marshall, Texas 75670

Electronic Availability

The BRAC Website at:
http://www.hqda.army.mil/acsim/brac/env_ea_review.htm

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SECTION 9.0 PERSONS CONSULTED

Information was solicited and collected from the following individuals or organizations in preparation of this document:

- USARC installation personnel
- Members of the LRA
- City of Marshall, Mayor Ed Smith
- City of Marshall, City Manager Buzz Snyder
- U.S. Environmental Protection Agency, Region 6
- U.S. Fish and Wildlife Service
- Texas Department of Transportation
- Texas Parks and Wildlife Commission
- Texas Commission on Environmental Quality
- Department of Housing and Urban Development, Office of Special Needs Assistance Programs
- Office of Environmental Policy and Compliance, U.S. Department of Interior
- Texas Historical Commission
- Caddo Nation
- Choctaw Nation of Oklahoma
- Muscogee (Creek) Nation of Oklahoma
- Tonkawa Tribe of Indians of Oklahoma
- Osage Nation

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SECTION 10.0 ACRONYMS

A		ECP	Environmental Condition of Property
AADT	Annual Average Daily Traffic	EDR	Environmental Data Resources, Inc.
ACM	Asbestos-Containing Material	EIFS	Economic Impact Forecast System
AFRC	Armed Forces Reserve Center	EIS	Environmental Impact Statement
AST	Aboveground Storage Tank	EMS	Emergency Medical Services
B		EO	Executive Order
BMPs	Best Management Practices	F	
BRAC	Base Closure and Realignment	FAR	Floor Area Ratio
BRAC Commission	Base Closure and Realignment Commission	FEMA	Federal Emergency Management Agency
C		FIRM	Flood Insurance Rate Map
CAA	Clean Air Act	FNSI	Finding of No Significant Impact
CEQ	Council on Environmental Quality	Ft	feet
CESQG	Conditionally Exempt Small Quantity Generator	G	
CFR	Code of Federal Regulations	GHG	Greenhouse Gases
CH ₄	Methane	GWP	Global Warming Potential
CO ₂	Carbon Dioxide	H	
CONEX	Container Express	HVAC	Heating, Ventilation, and Air Conditioning
D		HUD	Housing and Urban Development
dB	Decibel	I	
dBA	A-Weighted Noise Levels	I-69	Interstate 69
DoED	U.S. Department of Education	J	
DoD	U.S. Department of Defense	K	
DNL	Day-Night Average Sound Level	kg	kilograms
E			
EA	Environmental Assessment		

L		POL	Petroleum, Oils, and Lubricants
LBP	Lead-Based Paint	POV	Privately Owned Vehicle
Leq	equivalent sound level	Q	
LOS	Level of Service	R	
LQG	Large Quantity Generator	RCRA	Resource Conservation and Recovery Act
LRA	Local Redevelopment Authority	ROI	Region of Influence
M		RONA	Record of Non-Applicability
MEP	Military Equipment Parking	RSC	Regional Support Command
MICU	Mobile Intensive Care Unit	RTV	Rational Threshold Values
μSA	Micropolitan Statistical Area		
N		S	
N ₂ O	Nitrous Oxide	SF	Square Foot
NAAQS	National Ambient Air Quality Standards	SF ₆	Sulfur Hexafluoride
NCA	Noise Control Act	SHPO	State Historic Preservation Office
NEPA	National Environmental Policy Act	SIP	State Implementation Plan
NFIP	National Flood Insurance Program	SQG	Small Quantity Generator
NOI	Notice of Interest	SWEPCO	Southwestern Electric Power Company
NPDES	National Pollutant Discharge Elimination System	T	
NPS	National Park Service	TE/KSF	Trip-ends/1,000 SF
NRHP	National Register of Historic Places	THC	Texas Historical Commission
NWR	National Wildlife Refuge	TSI	Thermal System Insulation
		TXDOT	Texas Department of Transportation
O		U	
O ₃	Ozone	US	United States
OMS	Organizational Maintenance Shop	USACE	United States Army Corps of Engineers
OWS	Oil-Water Separator	USARC	United States Army Reserve Center
P		USC	United States Code
PBC	Public Benefit Conveyance	USEPA	United States Environmental Protection Agency
PCB	Polychlorinated biphenyls	USFWS	United States Fish and Wildlife Service

USGS	United States Geological Survey
UST	Underground Storage Tank
V	
VA	Veterans Association
VWR	Vehicle Wash Rack

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APPENDIX A – PUBLIC AND AGENCY COORDINATION

A.1 Scoping Coordination	A-3
A.2 SHPO – Section 106 Consultation	A-21
A.3 USFWS Consultation	A-55
A.4 Agency and Public Notices	A-65

Environmental Assessment Public and Agency Scoping

Agencies and organizations having a potential interest in the Proposed Action are provided the opportunity to participate in the decision making process. The Army invites public participation in the NEPA process. Consideration of the views and information provided by all interested persons promotes open communication and enables better decision making. Initial scoping letters were sent to federal, state, and local agencies as well as other interested parties to request comments on the proposed scope of the Marshall USARC EA. A 30-day comment period was initiated from the date of the letters. Information obtained during the scoping process could be used to develop the scope of the EA. All of the comment responses that were received within the 30-day public comment period are included in Section A.1.2 and are summarized in Section A.1.3.

Public and Agency Comments on the Final Environmental Assessment and Draft FNSI

As noted in Section 1.2, public involvement includes public comment on the final EA and draft FNSI. Agencies, organizations, Native American groups, and members of the public having a potential interest in the Proposed Action, including minority, low-income, and disadvantaged persons, are urged to participate in the NEPA process.

Per requirements specified in 40 CFR 1500-1508, the final EA was available for public and agency comment for a 30-calendar-day review period (starting with the publication of the Notice of Availability) to provide agencies, organizations, and individuals with the opportunity to comment on the EA and draft FNSI. Public notices were published in local newspapers to inform the public that the EA and draft FNSI were available for review. The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and draft FNSI for review, listed public libraries where paper copies of the EA and draft FNSI could be reviewed, and advised the public that an electronic version of the EA and draft FNSI were available for download at the following Web site:

http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

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A.1 Scoping Coordination

Appendix A.1 contains the following correspondence associated with the preparation of the Environmental Assessment

<u>Agency</u>	<u>Date</u>
Mr. Ed Smith, Mayor of Marshall	April 15, 2014
Dr. Willie R. Taylor, Office of Environmental Policy and Compliance	April 15, 2014
Ms. Rhonda Smith, USEPA Region 6 NEPA Coordinator	April 15, 2014
Ms. Linda R. Charest, HUD BRAC Coordinator	April 15, 2014
Mr. Dan Allen Hughes, Jr., Texas Parks and Wildlife Commission	April 15, 2014
Texas Parks and Wildlife Commission – Response	May 2, 2014
Dr. Bryan W. Shaw, Texas Commission on Environmental Quality	April 15, 2014

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Mayor Ed Smith
City of Marshall
P.O. Box 698
401 S. Alamo
Marshall, Texas 75670

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Mayor Smith:

The United States Army Reserve 63d Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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 and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the disposal and reuse of the Marshall USARC is to meet the requirements of the Base Realignment and Closure Act. The Marshall USARC is located at 1209 Pinecrest Drive East, Marshall, Texas. The site is approximately 3.8 acres in size and contains two permanent structures. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Five alternatives are being considered for the proposed action and all would occur at the current location of the Marshall USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Marshall USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military mission has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army has and will provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

The Local Redevelopment Authority's Redevelopment Plan was unable to identify a viable reuse alternative and the Army is moving forward with the disposal process with the intent of disposing of the property via public sale. Therefore, alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Marshall USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities, provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Marshall USARC property is in an area that is zoned by the City of Marshall as C-3, General Business District. This zoning designation prohibits industrial use and housing consisting of more than four connected units, but allows for a wide variety of retail, restaurant, office, transportation, institutional, medical, and other residential uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property:

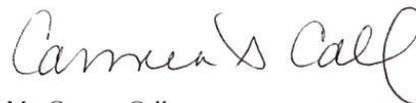
- Alternative 3 – Sale for Educational Use,
- Alternative 4 – Sale for Commercial Use, and
- Alternative 5 – Sale for Residential Use.

As part of the early project coordination and NEPA scoping process, we are requesting that stakeholders identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction,
- Available technical information regarding these issues, and
- Mitigation or permitting requirements that may be necessary for project implementation.

Comments on the proposed action and the 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 the NEPA Coordinator of the 63d RSC, AFRC-SCA-PWE (Carmen Call), P.O. Box 63, Moffett Field, California 94035-0063, or by email at carmen.a.call.civ@mail.mil. If you have any questions, please contact Ms. Call at (650) 279-1823.

Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures
Figure 1: Location Map
Figure 2: Current Site Plan



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Dr. Willie R. Taylor, Director
Office of Environmental Policy and Compliance
U.S. Department of the Interior
1849 C Street, NW (MS 2462)
Washington, DC 20240

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Dr. Taylor:

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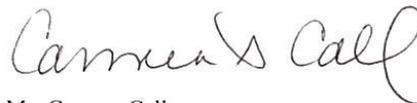
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Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures
Figure 1: Location Map
Figure 2: Current Site Plan



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Ms. Rhonda Smith
Region 6 NEPA Coordinator
U.S. Environmental Protection Agency
1445 Ross Avenue, 12th Floor Suite 1200
Dallas, Texas 75202-2733

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Ms. Smith:

The United States Army Reserve 63d Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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 and its alternatives. Your participation in this process is greatly appreciated.

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The Local Redevelopment Authority's Redevelopment Plan was unable to identify a viable reuse alternative and the Army is moving forward with the disposal process with the intent of disposing of the property via public sale. Therefore, alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Marshall USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities, provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

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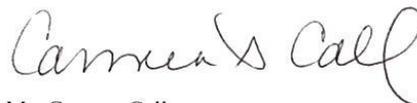
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Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Ms. Linda R. Charest, BRAC Coordinator
Office of Special Needs Assistance Programs
Department of Housing and Urban Development
451 7th Street, SW, Room #7266
Washington, DC 20410

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Ms. Charest:

The United States Army Reserve 63d Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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.

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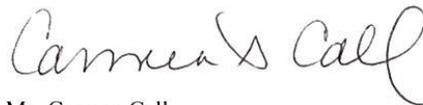
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63d Regional Support Command, DPW

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Dan Allen Hughes, Jr., Chairman
Texas Parks and Wildlife Commission
P.O. Box 14
Beeville, Texas 78104

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Mr. Hughes:

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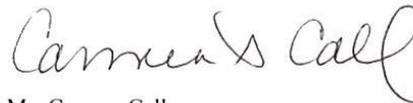
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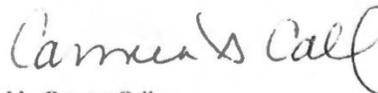
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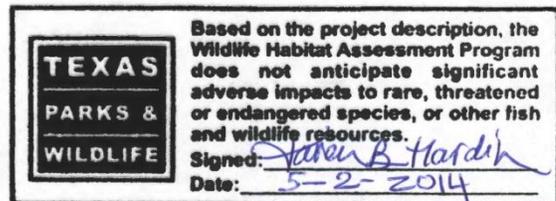
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Environmental Protection Specialist
63d Regional Support Command, DPW

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TPWD Project # 32776



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Dr. Bryan W. Shaw, Chairman
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Dr. Shaw:

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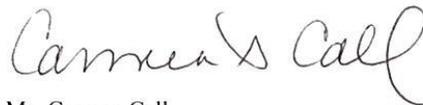
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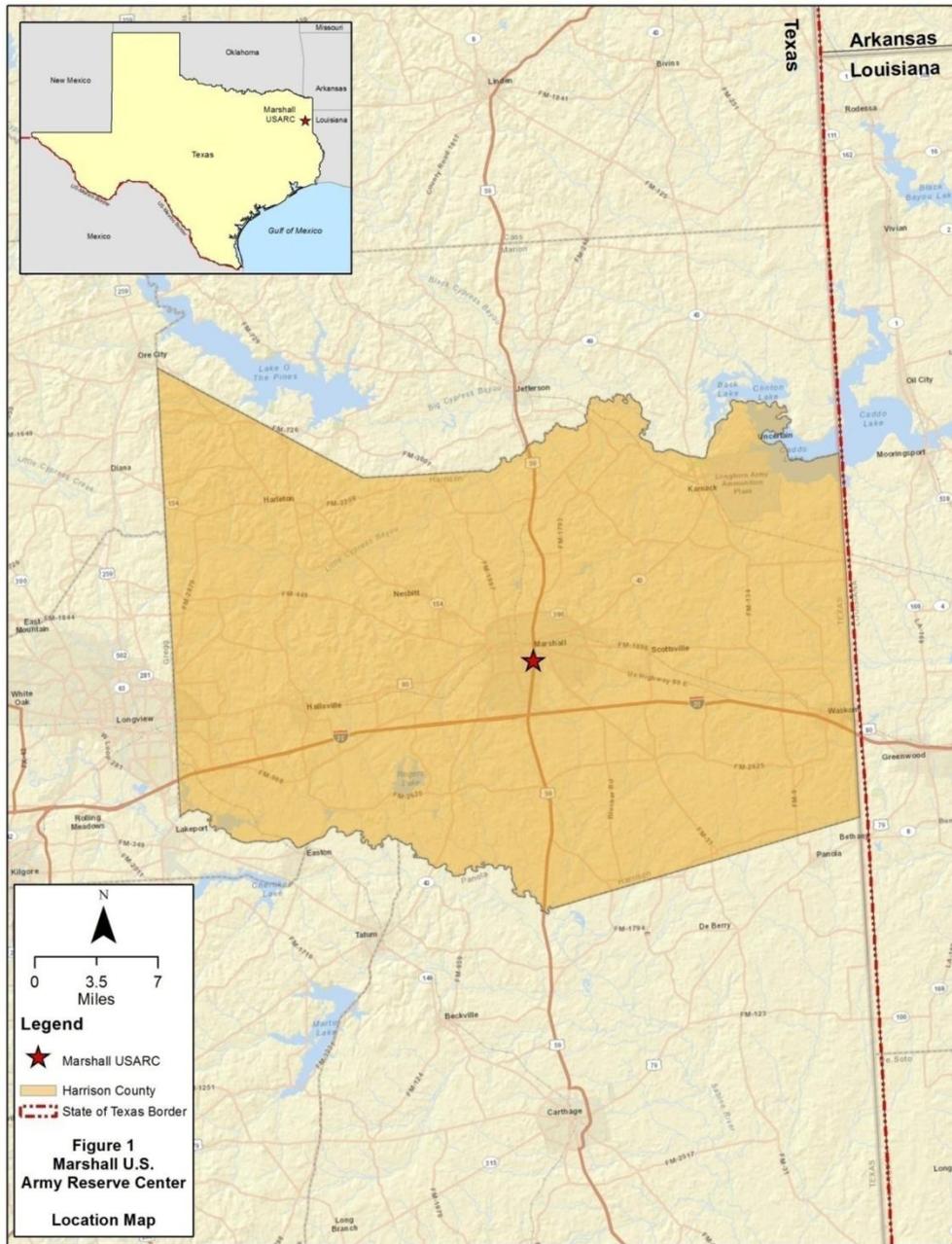
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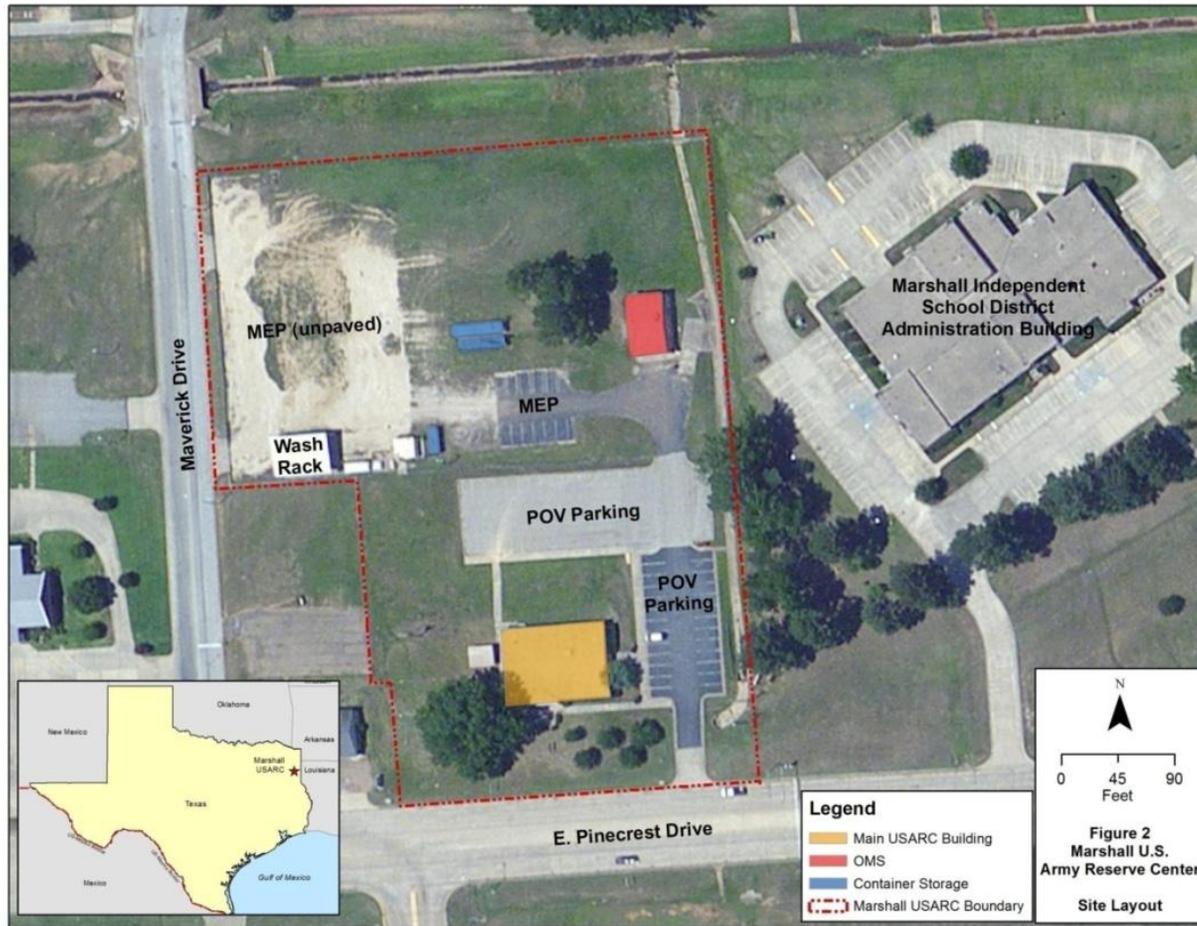
Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures
Figure 1: Location Map
Figure 2: Current Site Plan





A.2 SHPO – Section 106 Consultation

Appendix A.2 contains the following correspondence associated with the preparation of the Environmental Assessment and coordination with the State Historic Preservation Officer (SHPO) and Native American tribes

<u>Agency/Tribe</u>	<u>Date</u>
Dr. James E. Bruseth, State Historic Preservation Officer, Texas Historical Commission (Archeological Concurrence)	July 15, 1997
Archeological Assessment and Reconnaissance of 90 th Regional Support Command Facilities in Texas	1997
Mark Wolfe, State Historic Preservation Officer, Texas Historical Commission (Architectural Concurrence)	May 4, 2011
LaRue Parker, Caddo Nation of Oklahoma	November 11, 2011
Chairperson Brenda Shemayne Edwards, Caddo Nation	April 15, 2014
Chief Gregory E. Pyle, Choctaw Nation of Oklahoma	April 15, 2014
Response from the Choctaw Nation of Oklahoma	April 29, 2014
Chief George Tiger, Muscogee (Creek) Nation of Oklahoma	April, 15, 2014
Response from the Muscogee (Creek) Nation of Oklahoma	May 26, 2014
Chief Scott Bighorse, Osage Nation	April 15, 2014
President Donald Patterson, Tonkawa Tribe of Indians of Oklahoma	April 15, 2014

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TEXAS
HISTORICAL
COMMISSION

George W. Bush • Governor
John L. Nau, III • Chairman
Curtis Tunnell • Executive Director

The State Agency for Historic Preservation

July 15, 1997

Michael Petraglia, Ph. D.
Parsons Engineering Science, Inc.
10521 Rosehaven Street
Fairfax, Virginia 22030

Re: Draft Report: *Draft Archeological Assessment and Reconnaissance of 90th Regional Support
Command Facilities in Texas*
(Army, F2, F19)

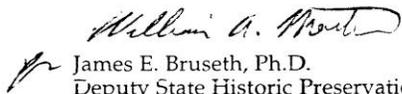
Dear Dr. Petraglia:

Thank you for the opportunity to review the draft report referenced above. We have reviewed the report and find that it is acceptable. We concur with the findings (page 119; Table 1) that 12 facilities containing 115 acres merit further archeological study.

We look forward to receiving 20 copies of the final report along with a completed *Abstracts in Texas Contract Archeology* form.

If we may be of further assistance, please call Mr. Herb Uecker at 512/463-5866.

Sincerely,


James E. Bruseth, Ph.D.
Deputy State Historic Preservation Officer

JEB/hgu

DIVISION OF ANTIQUITIES PROTECTION

P.O. Box 12276 • Austin, TX 78711-2276 • 512/463-6096 • Fax 512/463-8927 • TDD 1-800-735-2989

4 CONCLUSIONS AND MANAGEMENT RECOMMENDATIONS

The 90th RSC owns 35 properties in Texas, including land totaling 424 acres. Of these 35 facilities, 23 are considered to have too little potential for archeological sites to warrant a survey. No outcroppings of workable lithic material are known on any of the facilities. A brief reconnaissance of the facility at Seagoville was conducted to ascertain the level of integrity at the facility. One previously unrecorded prehistoric site was noted next to a spring fed lake on the facility. Three other facilities (Rathjen, Colbern, and Rio Grande City USARCs) include portions of previously recorded historical archeological sites associated with 19th century historic forts. Eight additional facilities, have no known sites, but are considered to have moderate to high potential. A total of 12 facilities have a total of 115 acres that merit further archeological study.

Table 1 provides a summary of the archeological potential for each facility. Archeological inventory survey of relatively intact portions of 12 facilities (Austin Memorial, Rathjen Memorial, Roque O. Segura, Van Zandt Memorial, Colbern Memorial, P.B. Clayton Memorial, Rio Grande City, Seagoville, Watts-Guillot, Yoakum Memorial, San Marcos, and Schmidt Memorial USARCs) would determine boundaries and assess integrity of known archeological sites, and locate any undiscovered sites. This would complete the archeological identification responsibilities for 90th RSC properties in Texas, and allow the development of a Cultural Resources Management Plan for the management of any identified historic properties, and execution of a Programmatic Agreement with the Advisory Council and the SHPO formalizing the procedures outlined in such a plan. The Texas SHPO concurred with these findings in a letter dated July 15, 1997 (Appendix A).

Table 1: 90 RSC Facilities in Texas

<i>Facility No.</i>	<i>Facility Title</i>	<i>City</i>	<i>Total Acres</i>	<i>Undevel. Acres</i>	<i>Acres Requiring Archeo. Survey</i>	<i>Archeo. Potential</i>
TX001	Grimes Memorial	Abilene	9.24	5	0	low
TX002	Alice	Alice	4	2	0	low
TX003	Blucher S. Tharp Memorial	Amarillo	4.1	1	0	low
TX006	Austin Memorial	Austin	13	4.2	4.2	high
TX0011	Carl H. Pipkin	Beaumont	NA	0.1	0	low
TX012	Rathjen Memorial	Brownsville	7.3	2.5	2.5	high
TX013	Moore Memorial	Bryan	5	0.8	0	low
TX018	Conroe	Conroe	50	7.3	0	low

Table 1: 90 RSC Facilities in Texas (cont.)

<i>Facility No.</i>	<i>Facility Title</i>	<i>City</i>	<i>Total Acres</i>	<i>Undevel. Acres</i>	<i>Acres Requiring Archeo. Survey</i>	<i>Archeo. Potential</i>
TX019	Corpus Christi Memorial	Corpus Christi	5	2.7	0	low
TX023	Jules E. Muchert	Dallas	5	0.1	0	low
TX025	William Herzog Memorial	Dallas	5	0.9	0	low
TX027	Roque O. Segura	El Paso	5	0.8	5	high
TX035	Van Zandt Memorial	Fort Worth	NA	2.4	2.4	high
TX040	Houston USARC #2	Houston	6	0.5	0	low
TX042	SGM. Garcia	Houston	8	0.5	0	low
TX045	Miller Memorial	Huntsville	7.5	4.6	0	low
TX046	Colbern Memorial	Laredo	6	1.8	1.8	high
TX053	Marshall	Marshall	4	NA	0	low
TX054	Garcia Memorial	McAllen	3	1	0	low
TX055	Hanby-Hayden	Mesquite	5	3.2	0	low
TX056	Air Terminal	Midland	6	3.2	0	low
TX058	Boyle Memorial	Paris	4.7	0.78	0	low
TX059	Pasadena	Pasadena	3.2	0.6	0	low
TX060	P.B. Clayton Memorial	Port Arthur	7	2.7	2.7	high
TX061	Rio Grande City	Rio Grande City	1.5	0.75	0.75	high
TX062	San Antonio	San Antonio	8	1.5	0	low
TX064	Callaghan	San Antonio	5	0.6	0	low
TX067	San Marcos	San Marcos	3.6	1.4	1.4	mod
TX068	Seagoville	Seagoville	206	80	80	high
TX071	Schmidt Memorial	Sinton	5	3	3	mod
TX072	Watts-Guillot	Texarkana	7	3.5	3.5	high
TX075	Victoria	Victoria	5.6	1.2	0	low
TX077	Wichita Falls	Wichita Falls	3	0.8	0	low
TX078	Yoakum Memorial	Yoakum	5	7.6	7.6	high
TX122	Waco	Waco	6	1.9	0	low

TEXAS HISTORICAL COMMISSION
real places telling real stories

May 4, 2011

Laura M. Caballero
BRAC Environmental Coordinator
63rd Regional Support Command
Department of the Army
P.O. Box 63
Moffett Field, California 94035-1000

Re: 63rd Regional Support Command eligibility concurrence on U.S. Army Reserve (USAR) Centers in Texas

Dear Ms. Caballero:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

Our staff, led by William McWhorter, has completed a review of the above referenced project. The THC concurs with your determination that the Grimes Memorial, the Rathjen Memorial, the Jules E. Murchet, the Roque O. Sequera Memorial, the Miller Memorial, the Marshall, the Hanby-Hayden Memorial, the Pasadena, the Boswell Street, the Callaghan Road, the San Marcos, and the Wichita Falls USAR Centers are **not-eligible** for listing in the National Register of Historical Places. The THC concurs with your determination of **eligible** for the Blucher S. Tharp Memorial USAR Center (in Amarillo) and the Watts- Guillot Memorial USAR Center (in Texarkana) for listing in the National Register of Historical Places.

We **do not concur** at this time with your determination that the proposed undertakings will have No Adverse Effect. The transfer of non-eligible resources out of Federal ownership or control will have No Effect to historic properties. The transfer of the two eligible reserve centers out of Federal ownership or control will have No Adverse Effect **only** if those properties are transferred with a protective covenant in place. Otherwise, under 36 CFR 800, the transfers will have Adverse Effects to the historic properties. Please provide us with additional information detailing the proposed transfer process for each reserve center and the Army's intentions regarding the placement of a protective covenant or treatment of potential Adverse Effects.

Thank you for your cooperation in the federal review process, and for your efforts to preserve the irreplaceable heritage of our nation. If you have any questions concerning this review or if we can be of further assistance, please contact William McWhorter at 512/463-5833. For questions related to development or review of the requested additional information, please contact Caroline Wright at 512/463-6214.

Sincerely,

William McWhorter

for: Mark Wolfe
State Historic Preservation Officer



DICK DEBBY GOVERNOR • IAN T. HANSEN CHAIRMAN • E. LAWRENCE DAVIS EXECUTIVE DIRECTOR



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. Box 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION OF:

11 November 2011

Environmental Office

LaRue Parker, Chairwoman
Caddo Nation of Oklahoma
P.O. Box 487
Binger, OK 73009

Dear Chairwoman Parker:

In accordance with the National Environmental Policy Act, 42 U.S.C. §§ 4321-4370d, National Historic Preservation Act, 16 U.S.C § 470 et seq., and the Native American Graves Protection and Repatriation Act, 25 U.S.C. § 3001 et seq., the 63D Regional Support Command is writing to inform the Caddo Nation of Oklahoma of the proposed transfer of Department of the Army property to private ownership. The Marshall USARC located at 1209 Pinecrest Drive East, Marshall, Texas will be transferred to the City of Marshall. In accordance with the 2005 Base Realignment and Closure (BRAC) legislation, the 63D Regional Support Command is requesting any information as to whether the transfer property is of religious or cultural significance to the Caddo Nation of Oklahoma.

The property is on 3.78 acres of land with two permanent buildings: a 4,472-square-foot Training Building and a 1,328-square-foot OMS. Approximately one-third of the Site is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.), while the remainder is covered by lawn except for the northern portion of the MEP area that is gravel covered.

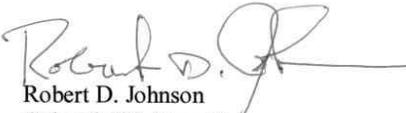
An archaeological assessment of Army Reserve properties conducted in June 1997 reported,

The archeological potential of the Marshall USARC is low due to the distance to permanent water sources, and the results of nearby surveys. Approximately 3/4 of the 4 acre facility remains largely intact. The facility is located on well drained Bernaldo fine sandy loam (Golden et al. 1994). The slope of the facility is 7%. The closest permanent water is a pond 3,800 feet away. It is located 300 feet from an intermittent stream, but the portion of that stream closest to the facility was surveyed in 1982 without finding any archeological sites (Jurgens 1982). A survey was also conducted along the street in front of the facility without finding any sites (DeBerry 1975). It is unlikely that any archeological sites remain on the facility. No archeological survey is recommended for the Marshall USARC.

The Texas SHPO concurred with this recommendation in a letter dated Tuesday, July 15, 1997. As a result of the archaeological assessment, the 63d Regional Support Command believes the probability for accessible, intact, subsurface archaeological deposits within the property boundary is very low.

Through this letter, the 63D Regional Support Command is seeking information and to initiate consultation with the Caddo Nation of Oklahoma regarding the transfer of the property. We request your comments on the proposed property transfer within 30 days of receiving this letter and its supporting photographs, maps, and aerials. If you have questions or concerns about this project, please contact Ms. Laura M. Caballero, BRAC Environmental Coordinator, 63d Regional Support Command at (650) 279-9112.

Sincerely,



Robert D. Johnson
Colonel, US Army Reserve
Director, Department of Public Works

Enclosure

STAFF COORDINATION / APPROVAL / ROUTING				SUSPENSE DATE: 14 Nov 2011					
				ORIGINATING OFFICE: DPW ENV					
SUBJECT: (BRAC) Tribal Consultation Letter for the Caddo Nation of Oklahoma									
ACTION REQUESTED:					DATE OF ACTION:				
<input checked="" type="checkbox"/> SIGNATURE <input type="checkbox"/> APPROVAL <input type="checkbox"/> INFO <input type="checkbox"/> OTHER _____					7 Nov 2011				
REMARKS (Describe briefly the origin of the action, summary, and recommendation. Must be sufficiently detailed to identify the action without resorting to other sources.) See reverse for continuation.									
<p>Attached for Colonel Johnson's signature is the consultation letter to the Caddo Nation of Oklahoma, which has a potential interest in the disposal of the Marshall USARC (TX053). Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among agency officials and other parties with an interest in the effects of the undertaking on historic properties. An archaeological assessment of this Army Reserve property conducted in July 1997 reported that no artifacts were recovered and it was determined that no further investigation of the facility was required. The Texas SHPO concurred with this recommendation in a letter dated August 1997. As a result of the archaeological assessment, the 63d Regional Support Command believes the probability for accessible, intact, subsurface archaeological deposits within the property boundary is very low.</p>									
OFFICE	NAME/DATE	CONCUR	NONCONCUR	THRU	TO	OFFICE	CONCUR	NOCONC	DATE
DPW Operations	COL Johnson	<i>[Signature]</i>			X	DPW			
						SGS			
						CSM			
						DCR			
						DMS			
						CS			
						DCG			
						CG			
ACTION OFFICER (Name, Rank/Title, Phone Number, Signature)					Note here if additional information is on reverse side or additional sheets are attached. <div style="text-align: center; font-size: 1.2em;">9 Nov 2011</div>				
<div style="text-align: center;"> Laura Caballero, Env Chief, 650-279-9112 </div>									

63D RSC FORM 1-R Aug 2009

AERIAL PHOTOGRAPH





DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Brenda Shemayne Edwards, Chairperson
Caddo Nation
P.O. Box 487
Binger, Oklahoma 73009

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Chairperson Edwards:

The United States Army Reserve 63d Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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. Further, Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties. The purpose of this letter is to inform your Tribe of an opportunity to assist the Army in identifying properties of religious or cultural significance to your Tribe in the project area and any potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the disposal and reuse of the Marshall USARC is to meet the requirements of the Base Realignment and Closure Act. The Marshall USARC is located at 1209 Pinecrest Drive East, Marshall, Texas. The site is approximately 3.8 acres in size and contains two permanent structures: a 4,472-square foot Training Building and a 1,328-square foot organizational maintenance shop (OMS). Both buildings were constructed in 1959 of concrete block with brick veneer on a concrete slab. The remainder of the site is covered in pavement (parking) or landscaped areas (Enclosures: Figures 1 and 2).

The 63d RSC has previously determined that the archeological potential of the Marshall USARC is low based on an archeological assessment of Army Reserve properties conducted in June 1997 (Enclosure). It is unlikely that any archeological sites remain on the facility and no archeological survey is recommended for the Marshall USARC. The Texas SHPO concurred with this recommendation in a letter dated July 15, 1997 (Enclosure).

The 63d RSC also determined that the buildings comprising the Marshall USARC are not eligible for the National Register of Historic Places (NRHP) based on an architectural survey and evaluation conducted in 2011 and that no historic properties would be affected by the proposed transfer of the property out of Federal ownership. The Texas SHPO concurred in a response dated May 4, 2011 (Enclosure).

NEPA requires that alternatives to the proposed action are analyzed. Five alternatives are being considered for the proposed action and all would occur at the current location of the Marshall USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Marshall USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military mission has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army has and will provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

The Local Redevelopment Authority's Redevelopment Plan was unable to identify a viable reuse alternative and the Army is moving forward with the disposal process with the intent of disposing of the property via public sale. Therefore, alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Marshall USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities, provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Marshall USARC property is in an area that is zoned by the City of Marshall as C-3, General Business District. This zoning designation prohibits industrial use and housing consisting of more than four connected units, but allows for a wide variety of retail, restaurant, office, transportation, institutional, medical, and other residential uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property:

- Alternative 3 – Sale for Educational Use,
- Alternative 4 – Sale for Commercial Use, and
- Alternative 5 – Sale for Residential Use.

Through this letter, the 63d RSC is initiating consultation with your Tribe regarding properties that may be affected by the transfer of the Marshall USARC. We request your comments on the proposed transfer within 30 days of receiving this letter. Written comments should be submitted to the NEPA Coordinator of the 63d RSC, AFRC-SCA-PWE (Carmen Call), P.O. Box 63, Moffett Field, California 94035-0063, or by email at carmen.a.call.civ@mail.mil. If you have any questions, please contact Ms. Call at (650) 279-1823.

Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures

Figure 1: Location Map

Figure 2: Current Site Plan

Archaeological Assessment Conclusions February 1998

SHPO Correspondence July 15, 1997

SHPO Correspondence May 4, 2011



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Gregory E. Pyle, Chief
Choctaw Nation of Oklahoma
P.O. Drawer 1210
Durant, Oklahoma 74702

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Chief Pyle:

The United States Army Reserve 63d Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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. Further, Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties. The purpose of this letter is to inform your Tribe of an opportunity to assist the Army in identifying properties of religious or cultural significance to your Tribe in the project area and any potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the disposal and reuse of the Marshall USARC is to meet the requirements of the Base Realignment and Closure Act. The Marshall USARC is located at 1209 Pinecrest Drive East, Marshall, Texas. The site is approximately 3.8 acres in size and contains two permanent structures: a 4,472-square foot Training Building and a 1,328-square foot organizational maintenance shop (OMS). Both buildings were constructed in 1959 of concrete block with brick veneer on a concrete slab. The remainder of the site is covered in pavement (parking) or landscaped areas (Enclosures: Figures 1 and 2).

The 63d RSC has previously determined that the archeological potential of the Marshall USARC is low based on an archeological assessment of Army Reserve properties conducted in June 1997 (Enclosure). It is unlikely that any archeological sites remain on the facility and no archeological survey is recommended for the Marshall USARC. The Texas SHPO concurred with this recommendation in a letter dated July 15, 1997 (Enclosure).

The 63d RSC also determined that the buildings comprising the Marshall USARC are not eligible for the National Register of Historic Places (NRHP) based on an architectural survey and evaluation conducted in 2011 and that no historic properties would be affected by the proposed transfer of the property out of Federal ownership. The Texas SHPO concurred in a response dated May 4, 2011 (Enclosure).

NEPA requires that alternatives to the proposed action are analyzed. Five alternatives are being considered for the proposed action and all would occur at the current location of the Marshall USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Marshall USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military mission has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army has and will provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

The Local Redevelopment Authority's Redevelopment Plan was unable to identify a viable reuse alternative and the Army is moving forward with the disposal process with the intent of disposing of the property via public sale. Therefore, alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Marshall USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Marshall USARC property is in an area that is zoned by the City of Marshall as C-3, General Business District. This zoning designation prohibits industrial use and housing consisting of more than four connected units, but allows for a wide variety of retail, restaurant, office, transportation, institutional, medical, and other residential uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property:

- Alternative 3 – Sale for Educational Use,
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- Alternative 5 – Sale for Residential Use.

Through this letter, the 63d RSC is initiating consultation with your Tribe regarding properties that may be affected by the transfer of the Marshall USARC. We request your comments on the proposed transfer within 30 days of receiving this letter. Written comments should be submitted to the NEPA Coordinator of the 63d RSC, AFRC-SCA-PWE (Carmen Call), P.O. Box 63, Moffett Field, California 94035-0063, or by email at carmen.a.call.civ@mail.mil. If you have any questions, please contact Ms. Call at (650) 279-1823.

Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures

Figure 1: Location Map

Figure 2: Current Site Plan

Archaeological Assessment Conclusions February 1998

SHPO Correspondence July 15, 1997

SHPO Correspondence May 4, 2011

From: Daniel R. Ragle [<mailto:dragle@choctawnation.com>]
Sent: Tuesday, April 29, 2014 6:39 AM
To: Call, Carmen A CIV USARMY 63 RSC (US)
Cc: Lindsey Bilyeu
Subject: RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas

Ms. Carmen,

The Choctaw Nation of Oklahoma thanks the United States Army Reserve 63d Regional Support Command for the correspondence regarding the above referenced project Marshall, Harrison Co., Texas lies outside of the Choctaw Nation of Oklahoma's area of historic interest. The Choctaw Nation of Oklahoma respectfully defers to the other Tribes that have been contacted. If you have any questions, please contact me by email at dragle@choctawnation.com.

Thank You,

Daniel Ragle
NHPA Section 106 Reviewer
Choctaw Nation of Oklahoma
Historic Preservation Department
P.O. Box 1210
Durant, OK 74702
(580)924-8280 ext. 2727
dragle@choctawnation.com



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

George Tiger, Principal Chief
Muscogee (Creek) Nation of Oklahoma
P.O. Box 580
Okmulgee, Oklahoma 74447

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Chief Tiger:

The United States Army Reserve 63d Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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-3-

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Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures

Figure 1: Location Map

Figure 2: Current Site Plan

Archaeological Assessment Conclusions February 1998

SHPO Correspondence July 15, 1997

SHPO Correspondence May 4, 2011

From: Johnnie Jacobs [<mailto:JJacobs@mcn-nsn.gov>]
Sent: Monday, May 26, 2014 2:32 PM
To: Call, Carmen A CIV USARMY 63 RSC (US)
Subject: Department of Army, EA for closure, disposal and reuse of Marshall U.S. Army Reserve Center in Marshall, Harrison County, TX

Dear Ms. Call,

Thank you for the correspondence regarding the above referenced project. Harrison County is within the historic area of interest to the Muscogee (Creek) Nation. The Muscogee (Creek) Nation is unaware of any Muscogee cultural or sacred sites located within the immediate project area. We concur that there should be no effects to any known historic properties and that work should proceed as planned. However, as the project is located in an area that is of general historic interest to the Tribe, we request that work be stopped and our office contacted immediately if any Native American cultural materials or remains are encountered. This stipulation should be placed on the construction plans to insure contractors are aware of it. Please feel free to contact me with any further questions or concerns.

Thank you,

Johnnie Jacobs, Manager
Cultural Preservation Office
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447
jjacobs@mcn-nsn.gov
Cell (405) 712-3623



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Scott Bighorse, Chief
Osage Nation
P.O. Box 779
Pawhuska, Oklahoma 74056

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear Chief Bighorse:

The United States Army Reserve 63d Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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. Further, Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties. The purpose of this letter is to inform your Tribe of an opportunity to assist the Army in identifying properties of religious or cultural significance to your Tribe in the project area and any potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the disposal and reuse of the Marshall USARC is to meet the requirements of the Base Realignment and Closure Act. The Marshall USARC is located at 1209 Pinecrest Drive East, Marshall, Texas. The site is approximately 3.8 acres in size and contains two permanent structures: a 4,472-square foot Training Building and a 1,328-square foot organizational maintenance shop (OMS). Both buildings were constructed in 1959 of concrete block with brick veneer on a concrete slab. The remainder of the site is covered in pavement (parking) or landscaped areas (Enclosures: Figures 1 and 2).

The 63d RSC has previously determined that the archeological potential of the Marshall USARC is low based on an archeological assessment of Army Reserve properties conducted in June 1997 (Enclosure). It is unlikely that any archeological sites remain on the facility and no archeological survey is recommended for the Marshall USARC. The Texas SHPO concurred with this recommendation in a letter dated July 15, 1997 (Enclosure).

The 63d RSC also determined that the buildings comprising the Marshall USARC are not eligible for the National Register of Historic Places (NRHP) based on an architectural survey and evaluation conducted in 2011 and that no historic properties would be affected by the proposed transfer of the property out of Federal ownership. The Texas SHPO concurred in a response dated May 4, 2011 (Enclosure).

NEPA requires that alternatives to the proposed action are analyzed. Five alternatives are being considered for the proposed action and all would occur at the current location of the Marshall USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Marshall USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military mission has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army has and will provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

The Local Redevelopment Authority's Redevelopment Plan was unable to identify a viable reuse alternative and the Army is moving forward with the disposal process with the intent of disposing of the property via public sale. Therefore, alternatives were developed to evaluate a reasonable and likely range of reuse and disposal possibilities for the Marshall USARC site. Recognizing the uncertainty that accompanies reuse planning, the Army uses intensity-based probable reuse scenarios to identify the range of reasonable reuse alternatives required by NEPA and by DoD implementing directives. That is, instead of trying to predict exactly what will occur at a site, the Army establishes ranges or levels of activity that might occur. These levels of activity, referred to as reuse intensities; provide a flexible framework capable of reflecting the different kinds of reuse that could occur at a location and their likely environmental effects.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a BRAC parcel and aid in the development of appropriate reuse alternatives. The Marshall USARC property is in an area that is zoned by the City of Marshall as C-3, General Business District. This zoning designation prohibits industrial use and housing consisting of more than four connected units, but allows for a wide variety of retail, restaurant, office, transportation, institutional, medical, and other residential uses. Alternatives 3, 4, and 5 are hypothetical reuse alternatives and they have been established to include likely reuses of the property:

- Alternative 3 – Sale for Educational Use,
- Alternative 4 – Sale for Commercial Use, and
- Alternative 5 – Sale for Residential Use.

-3-

Through this letter, the 63d RSC is initiating consultation with your Tribe regarding properties that may be affected by the transfer of the Marshall USARC. We request your comments on the proposed transfer within 30 days of receiving this letter. Written comments should be submitted to the NEPA Coordinator of the 63d RSC, AFRC-SCA-PWE (Carmen Call), P.O. Box 63, Moffett Field, California 94035-0063, or by email at carmen.a.call.civ@mail.mil. If you have any questions, please contact Ms. Call at (650) 279-1823.

Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures

Figure 1: Location Map

Figure 2: Current Site Plan

Archaeological Assessment Conclusions February 1998

SHPO Correspondence July 15, 1997

SHPO Correspondence May 4, 2011



DEPARTMENT OF THE ARMY
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND
P.O. BOX 63
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO
ATTENTION

15 April 2014

Donald Patterson, President
Tonkawa Tribe of Indians of Oklahoma
1 Rush Buffalo Road
Tonkawa, Oklahoma 74653-4449

RE: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center in Marshall, Texas.

Dear President Patterson:

The United States Army Reserve 63d Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Marshall U.S. Army Reserve Center (Marshall USARC). The EA is being prepared in accordance with Council on Environmental Quality 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 and with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation, *Protection of Historic Properties*, 36 CFR Part 800.

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Sincerely,



Ms. Carmen Call
Environmental Protection Specialist
63d Regional Support Command, DPW

Enclosures

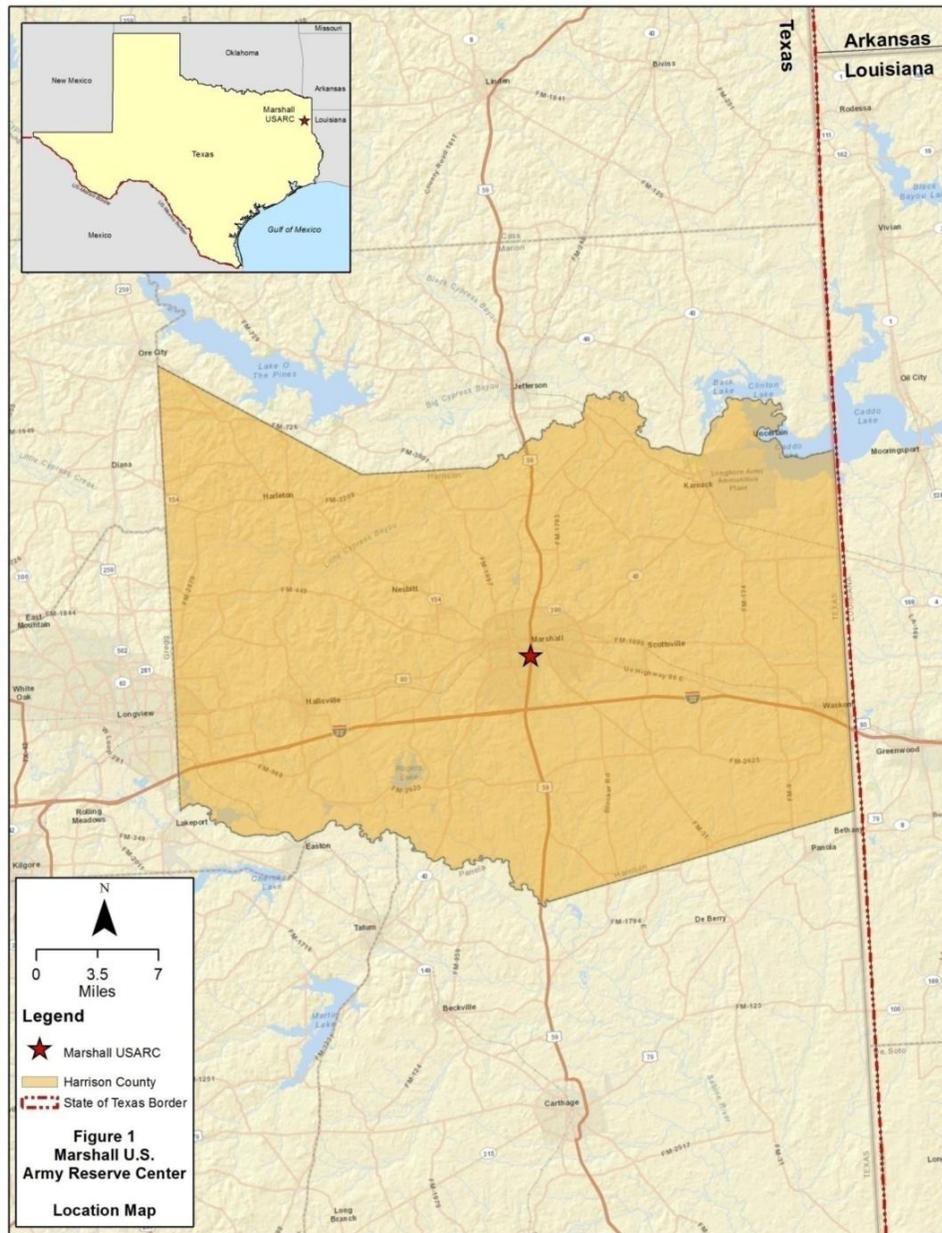
Figure 1: Location Map

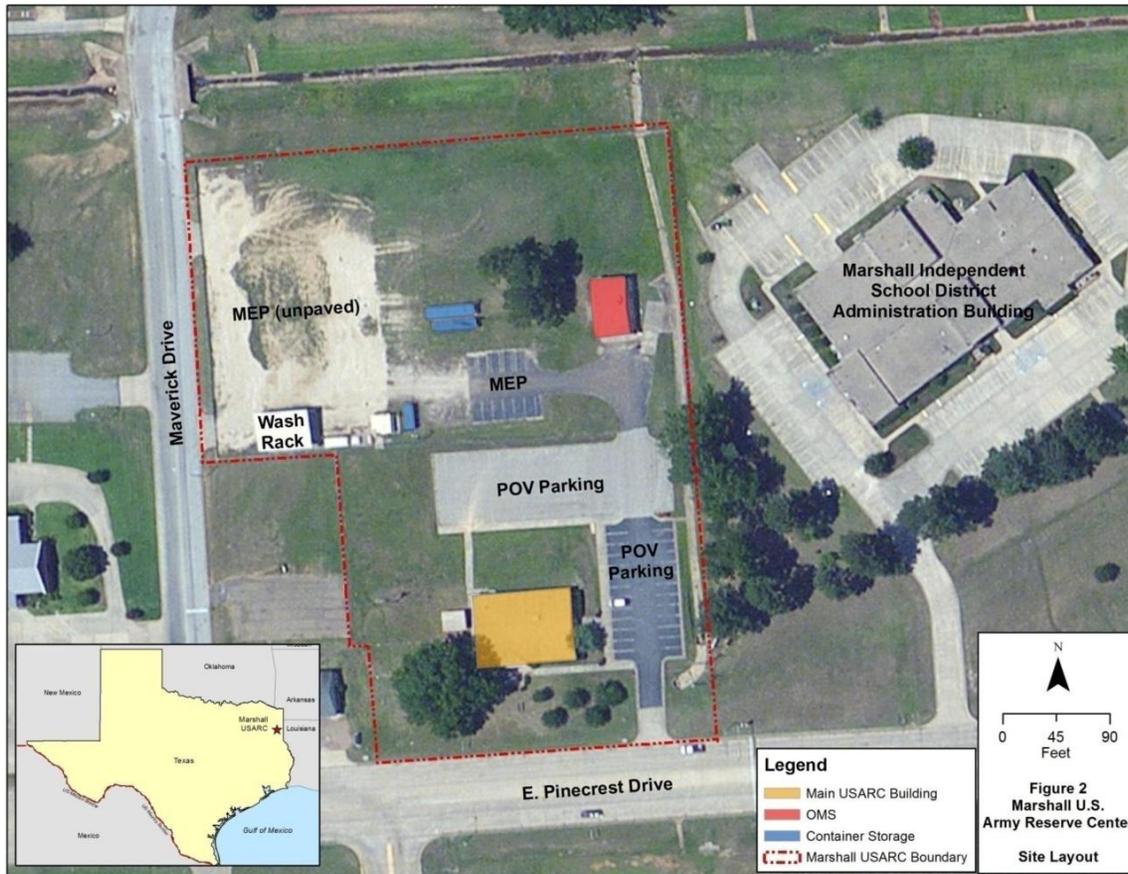
Figure 2: Current Site Plan

Archaeological Assessment Conclusions February 1998

SHPO Correspondence July 15, 1997

SHPO Correspondence May 4, 2011





4 CONCLUSIONS AND MANAGEMENT RECOMMENDATIONS

The 90th RSC owns 35 properties in Texas, including land totaling 424 acres. Of these 35 facilities, 23 are considered to have too little potential for archeological sites to warrant a survey. No outcroppings of workable lithic material are known on any of the facilities. A brief reconnaissance of the facility at Seagoville was conducted to ascertain the level of integrity at the facility. One previously unrecorded prehistoric site was noted next to a spring fed lake on the facility. Three other facilities (Rathjen, Colbern, and Rio Grande City USARCs) include portions of previously recorded historical archeological sites associated with 19th century historic forts. Eight additional facilities, have no known sites, but are considered to have moderate to high potential. A total of 12 facilities have a total of 115 acres that merit further archeological study.

Table 1 provides a summary of the archeological potential for each facility. Archeological inventory survey of relatively intact portions of 12 facilities (Austin Memorial, Rathjen Memorial, Roque O. Segura, Van Zandt Memorial, Colbern Memorial, P.B. Clayton Memorial, Rio Grande City, Seagoville, Watts-Guillot, Yoakum Memorial, San Marcos, and Schmidt Memorial USARCs) would determine boundaries and assess integrity of known archeological sites, and locate any undiscovered sites. This would complete the archeological identification responsibilities for 90th RSC properties in Texas, and allow the development of a Cultural Resources Management Plan for the management of any identified historic properties, and execution of a Programmatic Agreement with the Advisory Council and the SHPO formalizing the procedures outlined in such a plan. The Texas SHPO concurred with these findings in a letter dated July 15, 1997 (Appendix A).

Table 1: 90 RSC Facilities in Texas

Facility No.	Facility Title	City	Total Acres	Undevel. Acres	Acres Requiring Archeo. Survey	Archeo. Potential
TX001	Grimes Memorial	Abilene	9.24	5	0	low
TX002	Alice	Alice	4	2	0	low
TX003	Blucher S. Tharp Memorial	Amarillo	4.1	1	0	low
TX006	Austin Memorial	Austin	13	4.2	4.2	high
TX0011	Carl H. Pipkin	Beaumont	NA	0.1	0	low
TX012	Rathjen Memorial	Brownsville	7.3	2.5	2.5	high
TX013	Moore Memorial	Bryan	5	0.8	0	low
TX018	Conroe	Conroe	50	7.3	0	low

Table 1: 90 RSC Facilities in Texas (cont.)

Facility No.	Facility Title	City	Total Acres	Undevel. Acres	Acres Requiring Archeo. Survey	Archeo. Potential
TX019	Corpus Christi Memorial	Corpus Christi	5	2.7	0	low
TX023	Jules E. Muchert	Dallas	5	0.1	0	low
TX025	William Herzog Memorial	Dallas	5	0.9	0	low
TX027	Roque O. Segura	El Paso	5	0.8	5	high
TX035	Van Zandt Memorial	Fort Worth	NA	2.4	2.4	high
TX040	Houston USARC #2	Houston	6	0.5	0	low
TX042	SGM. Garcia	Houston	8	0.5	0	low
TX045	Miller Memorial	Huntsville	7.5	4.6	0	low
TX046	Colbern Memorial	Laredo	6	1.8	1.8	high
TX053	Marshall	Marshall	4	NA	0	low
TX054	Garcia Memorial	McAllen	3	1	0	low
TX055	Hanby-Hayden	Mesquite	5	3.2	0	low
TX056	Air Terminal	Midland	6	3.2	0	low
TX058	Boyle Memorial	Paris	4.7	0.78	0	low
TX059	Pasadena	Pasadena	3.2	0.6	0	low
TX060	P.B. Clayton Memorial	Port Arthur	7	2.7	2.7	high
TX061	Rio Grande City	Rio Grande City	1.5	0.75	0.75	high
TX062	San Antonio	San Antonio	8	1.5	0	low
TX064	Callaghan	San Antonio	5	0.6	0	low
TX067	San Marcos	San Marcos	3.6	1.4	1.4	mod
TX068	Seagoville	Seagoville	206	80	80	high
TX071	Schmidt Memorial	Sinton	5	3	3	mod
TX072	Watts-Guillot	Texarkana	7	3.5	3.5	high
TX075	Victoria	Victoria	5.6	1.2	0	low
TX077	Wichita Falls	Wichita Falls	3	0.8	0	low
TX078	Yoakum Memorial	Yoakum	5	7.6	7.6	high
TX122	Waco	Waco	6	1.9	0	low



TEXAS
HISTORICAL
COMMISSION

George W. Bush • Governor
John L. Nau, III • Chairman
Curtis Tunnell • Executive Director

The State Agency for Historic Preservation

July 15, 1997

Michael Petraglia, Ph. D.
Parsons Engineering Science, Inc.
10521 Rosehaven Street
Fairfax, Virginia 22030

Re: Draft Report: *Draft Archeological Assessment and Reconnaissance of 90th Regional Support
Command Facilities in Texas*
(Army, F2, F19)

Dear Dr. Petraglia:

Thank you for the opportunity to review the draft report referenced above. We have reviewed the report and find that it is acceptable. We concur with the findings (page 119; Table 1) that 12 facilities containing 115 acres merit further archeological study.

We look forward to receiving 20 copies of the final report along with a completed *Abstracts in Texas Contract Archeology* form.

If we may be of further assistance, please call Mr. Herb Uecker at 512/463-5866.

Sincerely,

A handwritten signature in cursive script, appearing to read "William G. Bruseth".

James E. Bruseth, Ph.D.
Deputy State Historic Preservation Officer

JEB/hgu

DIVISION OF ANTIQUITIES PROTECTION

P. O. Box 12276 • Austin, TX 78711-2276 • 512/463-6096 • Fax 512/463-8927 • TDD 1-800-735-2989

TEXAS HISTORICAL COMMISSION
real places telling real stories

May 4, 2011

Laura M. Caballero
BRAC Environmental Coordinator
63rd Regional Support Command
Department of the Army
P.O. Box 63
Moffett Field, California 94035-1000

Re: 63rd Regional Support Command eligibility concurrence on U.S. Army Reserve (USAR) Centers in Texas

Dear Ms. Caballero:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

Our staff, led by William McWhorter, has completed a review of the above referenced project. The THC concurs with your determination that the Grimes Memorial, the Rathjen Memorial, the Jules E. Murchet, the Roque O. Sequra Memorial, the Miller Memorial, the Marshall, the Hanby-Hayden Memorial, the Pasadena, the Boswell Street, the Callaghan Road, the San Marcos, and the Wichita Falls USAR Centers are **not-eligible** for listing in the National Register of Historical Places. The THC concurs with your determination of **eligible** for the Blucher S. Tharp Memorial USAR Center (in Amarillo) and the Watts- Guillot Memorial USAR Center (in Texarkana) for listing in the National Register of Historical Places.

We **do not concur** at this time with your determination that the proposed undertakings will have No Adverse Effect. The transfer of non-eligible resources out of Federal ownership or control will have No Effect to historic properties. The transfer of the two eligible reserve centers out of Federal ownership or control will have No Adverse Effect **only** if those properties are transferred with a protective covenant in place. Otherwise, under 36 CFR 800, the transfers will have Adverse Effects to the historic properties. Please provide us with additional information detailing the proposed transfer process for each reserve center and the Army's intentions regarding the placement of a protective covenant or treatment of potential Adverse Effects.

Thank you for your cooperation in the federal review process, and for your efforts to preserve the irreplaceable heritage of our nation. If you have any questions concerning this review or if we can be of further assistance, please contact William McWhorter at 512/463-5833. For questions related to development or review of the requested additional information, please contact Caroline Wright at 512/463-6214.

Sincerely,

William McWhorter

for: Mark Wolfe
State Historic Preservation Officer



DICK DEBBY GOVERNOR • IAN T. HANSEN CHAIRMAN • C. LAWRENCE DAVE EXECUTIVE DIRECTOR

A.3 USFWS Consultation

Appendix A.3 contains the following correspondence with USFWS associated with the preparation of the Environmental Assessment

Agency

Date

Arlington Texas Ecological Services Field Office

July 18, 2011

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DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 63RD REGIONAL SUPPORT COMMAND
P.O. Box 63
MOFFETT FIELD, CALIFORNIA 94035-1000

July 18, 2011

Reply to the Attention of the Environmental Office

Arlington Texas Ecological Services Field Office
711 Stadium Drive Suite 252
Arlington, Texas 76011

Dear Sir or Madam:

In accordance with The Base Realignment and Closure Act of 2005, The 63D Regional Support Command (RSC) of the United States Army Reserve (USAR) is closing the Marshall USAR Center located at 1209 Pinecrest Drive East, Marshall, Texas 75670.

Pursuant to Section 7 of the Endangered Species Act, the USAR has determined the proposed action will have no effect on any listed federally threatened and endangered species or designated critical habitat. This determination is based on the fact that the proposed transfer will be "as is" (no land clearing or construction activities).

The 63D RSC communicates no effect determinations with the US Fish and Wildlife Service in the event that data on threatened and endangered species near the site has recently been received. The 63D RSC requests a response within 30 days from receipt of this letter. If no response is received within the 30 days, concurrence will be assumed. If you have questions, please contact me at (650) 279-9112. Thank you for your assistance.

Sincerely,

Laura M. Caballero
for: Laura M. Caballero
BRAC Environmental Coordinator
63D Regional Support Command

Enclosure

Enclosure 1

The U.S. Army Reserve (USAR) is closing the Marshall USAR Center located at 1209 Pinecrest Drive East, Marshall, Texas 75670. The property will be transferred to the City of Marshall to use as a museum and memorial.

Site Description and Usage – A site reconnaissance of this facility was conducted as part of the Environmental Condition of Property report process. The subject property is on 3.78 acres of land with two permanent buildings: a 4,472 square-foot Training Building and a 1,328 square-foot Organizational Maintenance Shop.

Ecological Communities

Approximately one-third of the Site is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.), while the remainder is covered by lawn except for the northern portion of the Military Equipment Parking area that is gravel covered. The site is urban and developed and is located in a commercial area.

Wetlands, Watersheds, and Surface Waters

The Site drains north toward Turtle Creek, a concrete-lined drainage feature, and east toward a drainage ditch that flows north to Turtle Creek. Turtle Creek is the only surface water body present on the Site or adjacent areas. The Site is upland and well drained. According to the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map, no digital wetlands data is available. However, no wetlands are known to occur on the property.

FEDERALLY LISTED AND PROPOSED SPECIES

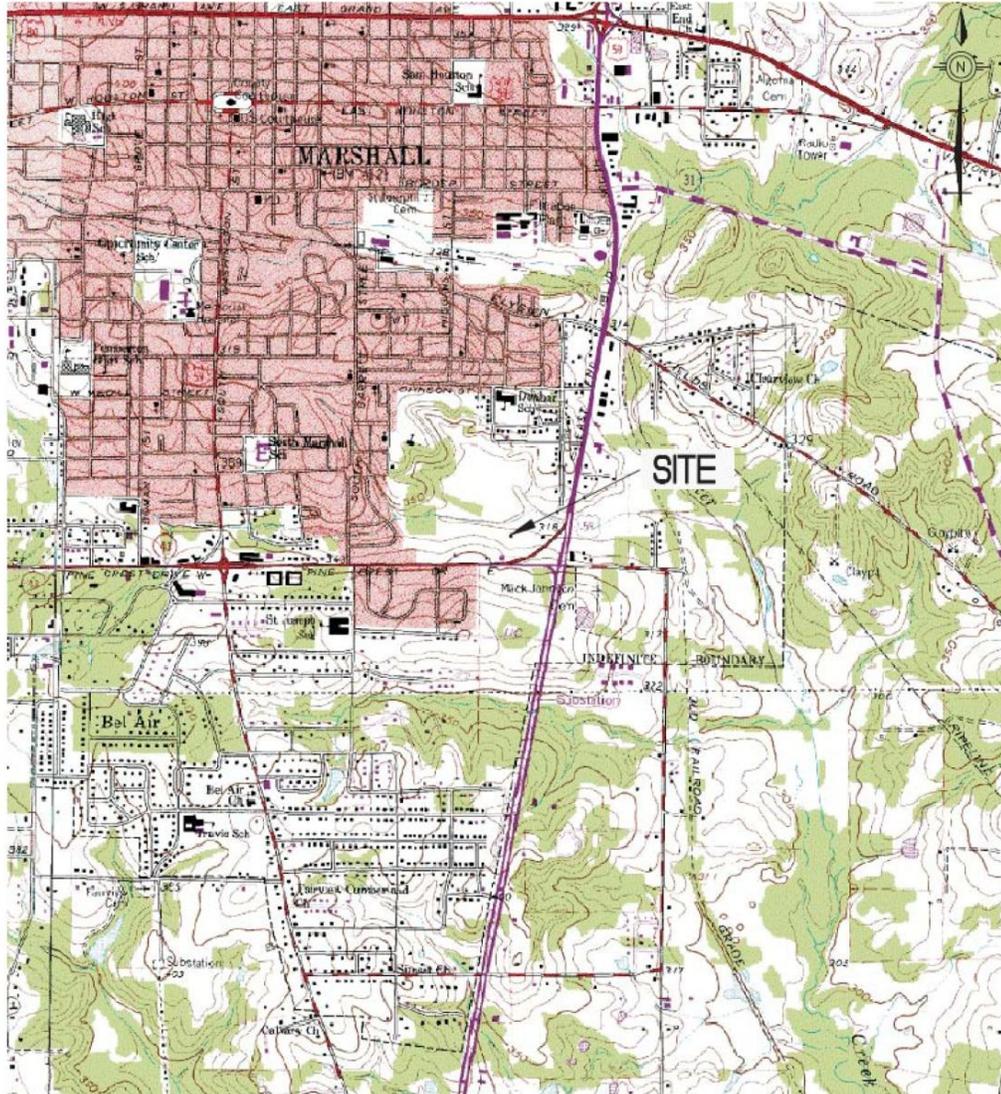
Based on the USFWS Region 2 Endangered Species List, Harrison County, Texas, the following threatened and endangered species occur within Harrison County, Texas:

Louisiana black bear (*Ursus americanus luteolus*)
No Common Name (*Geococcyx minimum*)

CONCLUSIONS

After reviewing the listing for the Endangered Species in Harrison County, it is determined that no impacts to Federally listed species are projected to occur during this project. The determination is based on the fact that the property is proposed to be removed from the USAR's holdings - "as is". Therefore, no construction or ground disturbing activities will take place during this action. Also no habitat to support any of the Federal endangered or threatened species listed for Harrison County occurs upon the property. The USAR, in lieu of any potential impact, determines that this action will have no effect on Federally-listed threatened and endangered species.

SITE LOCATION



AERIAL PHOTOGRAPH



SITE PHOTOGRAPHS



Photo 1: View of the south property boundary from the southwest corner of the Site.



Photo 2: Concrete-lined drainage creek.



Photo 3: The Organizational Maintenance Shop building while facing the northeast.

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A.4 Agency and Public Notices

Per requirements specified in 32 CFR Part 651.4, a 30-calendar-day review period (starting with the publication of the Notice of Availability) was established to provide all agencies, organizations, and individuals with the opportunity to comment on the EA and FNSI. An NOA was published in local and regional newspapers to inform the public that the EA and FNSI were available for review. The newspapers were:

- *Marshall News Messenger*
- *Longview News-Journal*

The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and FNSI for review, listed where paper copies of the EA and FNSI could be reviewed, and advised the public that an electronic version of the EA and FNSI were available for download at the following Web site:

http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

The EA was available for public review and comment at the following libraries:

- Marshall Public Library

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APPENDIX B – AIR CONFORMITY APPLICABILITY ANALYSIS

Introduction

A General Air Conformity Applicability Analysis was conducted to determine if increases in air pollution from the construction project associated with the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the Marshall U.S. Army Reserve Center (USARC), Texas would affect compliance with National Ambient Air Quality Standards (NAAQS). The project will occur within a U.S. Environmental Protection Agency (USEPA) designated maintenance area for PM 10, and carbon monoxide (CO) and is therefore subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.

The 1990 amendments to the Federal Clean Air Act (CAA), Section 176 required the USEPA to promulgate rules to ensure that federal actions that produce emissions of any criteria air pollutants for which an area is not in attainment conform to the appropriate State Implementation Plan (SIP). These resulting rules, known together as the General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), require any federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the General Conformity Rule's requirements or positively determine that the action conforms to the provisions and objectives of the applicable SIP. Any mitigation deemed necessary as a result of the conclusions reached in the conformity analysis would be implemented and integrated into the Texas Commission on Environmental Quality SIP.

The General Conformity Rule requires an assessment of the magnitude of potential total emissions of non-attainment criteria pollutants, including their precursors, associated with a proposed federal action when determining conformity of that action. The rule does not apply to certain "exempt" actions or to actions where the total emissions of criteria pollutants are at or below specified *de minimis* levels. In addition, ongoing activities currently being conducted are exempt from the rule as long as there is no net increase in emissions above the specified *de minimis* levels. If the predicted emissions exceed the *de minimis* levels, a formal air conformity determination is necessary. If the *de minimis* levels are not exceeded, and if the predicted emissions do not exceed 10 percent of a non-attainment area's total emission budget for a given pollutant, a record of non-applicability must be prepared.

For purposes of determining a project's emissions, emissions are those directly associated with project activities at the time and location of the project. For the proposed action, emissions include those from routine operational activities and operation of permitted emission sources, as well as actual construction activities, construction vehicles and equipment, and any ancillary emissions sources.

Site Description

The property is located at 1209 Pinecrest Drive East, in Marshall, Texas. The U.S. Government acquired the 3.78-acre property from Roger and Mary Magers on August 12, 1958, and the Marshall USARC was constructed in 1959 (USACE 2007).

The USARC contains two permanent structures and two parking lots including a military equipment parking (MEP) area and a paved privately owned vehicle (POV) parking area. The two permanent structures comprise a 4,472-square-foot main administrative building and a

1,328-square-foot organizational maintenance shop (OMS) that is currently inactive. The main building and OMS walls are concrete block with brick veneer.

The main building is a rectangular, single-story structure. The building's interior consists of office space, classrooms, a kitchen area, storage, and a mechanical room. The OMS building is a one-bay, one-story maintenance shop used primarily for vehicle maintenance and storage. Other improvements on the property include a vehicle wash rack (VWR) with associated oil-water separator (OWS) system, and a picnic/break area shelter. Also located on the property were three steel mobile shipping containers (CONEX) used to store field equipment (USAR 2012a).

The perimeter of the OMS and MEP area is secured by a chain-link fence along Mustang Drive, with two vehicle access gates located on the west side. There are pedestrian and vehicle access gates that both open into the POV parking lot located on the south side. Approximately one-third of the property is impervious (asphalt parking areas, driveways, concrete walkways, buildings, etc.), while the remainder is covered by lawn except for the northern portion of the MEP area that is gravel. The property is bordered to the south by Pinecrest Drive East and to the west by Mustang Drive. A concrete-lined drainage feature known as Turtle Creek runs along the northern border of the property. Topographically, the property is relatively flat with a gentle slope down to the north. No signs of erosion, excavation, or fill were observed on the property.

According to the records review of the 2007 Environmental Condition of Property (ECP) Report, the Army removed a VWR and associated OWS in 1999. The removed VWR and OWS were located near the OMS. The current vehicle wash area consisting of a covered concrete pad is located west of the OMS building in the fenced MEP area (USACE 2007).

The Marshall USARC was most recently occupied by the 721st Engineer Company. The USARC previously consisted of 1 full time staff and approximately 42 reservists that trained at the USARC one weekend per month.

Emission Factors – No Action Alternative

Heating Source Emissions

The analysis has been conducted using the assumption that the heat will be provided by small individual boilers that operate at less than 100 million BTUs per hour (Building Energy Data Book DOI). The average energy intensity for office buildings using natural gas in the West South Central Region is 32.2 cubic feet (CF) of gas annually per square foot, so approximately 186,760 CF of natural gas is needed to heat the 5,800 SF administration building. Assumptions for operational heating estimates were based on the most recent Commercial Energy Consumption Survey (CBECS) in 2003 conducted by the Department of Energy Information Administration.

Emission factors (EFs) were obtained from the USEPAs AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors Volume 1: Chapter 1: Stationary Sources, Supplement D. Criteria pollutants emitted from natural gas-fired boilers include N0x, VOCs, CO, and trace amounts of SO2, Pb and particulate matter.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Building Heating	0.009	0.0005	0.0007	0.0007	0.00006	0.008	4.67E-08

TPY – Tons Per Year

All Pm is assumed to be 1.0 micrometer in diameter; therefore, the PM emission factor can be used for both 2.5 and 10 (AP-42, Supplement D)

Vehicle Emissions

Under the No Action Alternative, there would be 1 employee commuting daily (i.e. 5 days per week). Additionally, one weekend per month, there would be an additional 42 vehicles for training. For purposes of this analysis, the max number of weekends and reservists will be used in calculations. According to the US Census, the average, daily Marshall Commute is 17 minutes. Therefore, a car travelling an average speed (35 mph) would travel approximately 11 miles in 17 minutes for a total daily commute of 22 miles.

Emission factors are based on the MOBILE air modeling program at an annual average temperature of 57.5 degrees Fahrenheit and AP-42, Appendix H (Table 1.1B.1) January 2005. Criteria pollutants emitted from commuter vehicles include N0x, VOCs, CO, and trace amounts of SO2 and particulate matter. It was assumed that commuter traffic would be light duty gasoline vehicles using unleaded gasoline.

Activity	Annual Emissions (TPY)					
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO
Commuter Traffic	0.002	0.004	0.0003	0.0003	0.0002	0.03

TPY – Tons Per Year

Non-Road/Non-Mobile Source Emissions

Non-Road emissions are based on the EPA NONROAD 2005 model and EPA 420-F-05-022. Assumptions were that minimal ground maintenance would occur on a weekly basis that would use lawnmowers, weed whackers, and leaf blowers that run on unleaded gasoline.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Various Equipment Sources	0.08	1.15	0.01	0.02	0.02	20.56	--

TPY – Tons Per Year

Summary of Emissions for the No Action Alternative

All Activities Combined	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
	0.09	1.15	0.01	0.02	0.02	20.60	4.67E-08

TPY – Tons Per Year

Emission Factors –Alternative 2

Heating Source Emissions assumptions and inputs are the same as the No action Alternative with one additional assumption. For this analysis, it is assumed that during caretaker status the heating would run to maintain the system or at 50 percent capacity of the current use.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Building Heating	0.005	0.0003	0.0004	0.0004	0.00003	0.004	2.33E-08

TPY – Tons Per Year

Vehicle Emissions

Under caretaker status, it is anticipated that one person would commute to the site 1 time a week to monitor the building and do routine maintenance.. The average, daily commute is 17 minutes (22 miles travelling at 35 mph).

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Commuter Traffic	0.001	0.0002	0.00001	0.0001	0.000009	0.01	-

TPY – Tons Per Year

Non-Road/Non-Mobile Source Emissions

Non-Road emissions would be the same as under the No Action Alternative. There would be weekly maintenance activities such as mowing and trimming.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Various Equipment Sources	0.08	1.15	0.01	0.02	0.02	20.56	-

TPY – Tons Per Year

Summary of Emissions

All Activities Combined	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
	0.09	1.15	0.01	0.02	0.02	20.57	2.33E-08

TPY – Tons Per Year

Emission Factors –Alternative 3

Approximately 3.8 million CF of natural gas is needed to heat a 120,000 SF.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Building Heating	0.19	0.01	0.15	0.15	0.001	0.16	9.66E-07

TPY – Tons Per Year

Vehicle Emissions

Commuter patterns would change under this alternative. There could be up to 600 users per day. The average, daily commute is 11 miles (22 miles round trip). During the demolition phase, there would be workers temporarily commuting to the site. For purposes of this analysis, we will assume 37 workers will be on site daily for one year.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Commuter Traffic (Reuse)	3.65	0.62	0.05	0.52	0.03	39.8	-
Traffic (Construction)	2.66	1.88	0.003	0.03	0.002	19.37	
TOTAL	6.31	2.50	0.05	0.55	0.023	59.17	-

TPY – Tons Per Year

Non-Road/Non-Mobile Source Emissions

Non-Road Emissions activities are anticipated to be lawnmowers, weed whackers, and leaf blowers that run on unleaded gasoline during the reuse.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Various Equipment Sources (Reuse)	0.08	1.14	0.01	0.02	0.02	20.56	--

TPY – Tons Per Year

Emission Factors –Alternative 4

Approximately 3.8 million CF of natural gas is needed to heat a 120,000 SF.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Building Heating	0.19	0.01	0.15	0.15	0.001	0.16	9.66E-07

TPY – Tons Per Year

Vehicle Emissions

Commuter patterns would change under this alternative. There could be up to 600 users per day. The average, daily commute is 11 miles (22 miles round trip). During the demolition phase, there would be workers temporarily commuting to the site. For purposes of this analysis, we will assume 37 workers will be on site daily for one year.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Commuter Traffic (Reuse)	3.65	0.62	0.05	0.52	0.03	39.8	-
Traffic (Construction)	2.66	1.88	0.003	0.03	0.002	19.37	
TOTAL	6.31	2.50	0.05	0.55	0.023	59.17	-

TPY – Tons Per Year

Non-Road/Non-Mobile Source Emissions

Non-Road Emissions activities are anticipated to be lawnmowers, weed whackers, and leaf blowers that run on unleaded gasoline during the reuse.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Various Equipment Sources (Reuse)	0.08	1.14	0.01	0.02	0.02	20.56	--

TPY – Tons Per Year

Building Demolition, Haul Road, and Paving Operations

Estimate approximately 3 acres of ground disturbance. Demolition of 5,800 SF and new construction of 120,000 SF.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Various Equipment Sources (Reuse)	11.8	1.04	3.71	4.05	1.28	5.54	-

TPY – Tons Per Year

Summary of Emissions

All Activities Combined	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
	18.38	4.70	3.79	4.64	2.60	90.81	--

TPY – Tons Per Year

Emission Factors –Alternative 5

Approximately 1.6 million CF of natural gas is needed to heat a 50,000 SF.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Building Heating	0.08	0.004	0.006	0.006	0.0005	0.07	4.03E-07

TPY – Tons Per Year

Vehicle Emissions

Commuter patterns would change under this alternative. There could be up to 58 vehicles per day. The average, daily commute is 11 miles (22 miles round trip). During the demolition phase, there would be workers temporarily commuting to the site. For purposes of this analysis, we will assume 16 workers will be on site daily for one year.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Commuter Traffic (Reuse)	0.49	0.08	0.007	0.07	0.005	5.41	-
Traffic (Construction)	1.14	0.81	0.001	0.014	0.0009	8.37	-
TOTAL	1.63	0.89	0.008	0.08	0.006	13.78	-

TPY – Tons Per Year

Non-Road/Non-Mobile Source Emissions

Non-Road Emissions activities are anticipated to be lawnmowers, weed whackers, and leaf blowers that run on unleaded gasoline during the reuse.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Various Equipment Sources (Reuse)	0.08	1.14	0.01	0.02	0.02	20.56	--

TPY – Tons Per Year

Building Demolition, Haul Road, and Paving Operations

Estimate approximately 3 acres of ground disturbance. Demolition of 5,800 SF and new construction of 120,000 SF.

Activity	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
Various Equipment Sources (Reuse)	5.03	0.46	3.29	3.59	0.55	2.33	-

TPY – Tons Per Year

Summary of Emissions

All Activities Combined	Annual Emissions (TPY)						
	N0x	Ozone	PM _{2.5}	PM ₁₀	SO ₂	CO	Pb
	6.82	2.49	3.31	3.70	0.56	36.74	--

TPY – Tons Per Year

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APPENDIX C – EIFS REPORT

Introduction

The Economic Impact Forecast System (EIFS) model provides a systematic method for evaluating the regional socioeconomic effects of government actions, particularly military actions. Using employment and income multipliers developed with a comprehensive regional/local database combined with economic export base techniques, the EIFS model estimates the regional economic impacts in terms of changes in employment generated, changes in population, and expenditures directly and indirectly resulting from project construction. The EIFS model evaluates economic impacts in terms of regional change in business volume, employment and personal income, and expenditures for local and regional services, materials, and supplies. Although the EIFS model does not provide an exact measure of actual dollar amounts, it does offer an accurate relative comparison of alternatives.

EIFS REPORT

PROJECT NAME

BRAC EA - Marshall Alternative 3

STUDY AREA

48203 Harrison, TX

FORECAST INPUT

Change In Local Expenditures	\$10,800,000
Change In Civilian Employment	154
Average Income of Affected Civilian	\$35,050
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Military Living On-post	0

FORECAST OUTPUT

Employment Multiplier	2.27	
Income Multiplier	2.27	
Sales Volume - Direct	\$10,382,040	
Sales Volume - Induced	\$13,185,190	
Sales Volume - Total	\$23,567,230	1.58%
Income - Direct	\$6,276,552	
Income - (Induced)	\$1,917,789	
Income - Total (place of work)	\$8,194,342	0.74%
Employment - Direct	196	
Employment - Induced	53	
Employment - Total	249	0.87%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	8.51 %	7.3 %	5.87 %	3.53 %
Negative RTV	-5.39 %	-6.04 %	-5.31 %	-1.07 %

EIFS REPORT

PROJECT NAME

BRAC EA - Marshall Alternative 4

STUDY AREA

48203 Harrison, TX

FORECAST INPUT

Change In Local Expenditures	\$9,000,000
Change In Civilian Employment	128
Average Income of Affected Civilian	\$35,050
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Military Living On-post	0

FORECAST OUTPUT

Employment Multiplier	2.27		
Income Multiplier	2.27		
Sales Volume - Direct	\$8,642,308		
Sales Volume - Induced	\$10,975,730		
Sales Volume - Total	\$19,618,040	1.32%	
Income - Direct	\$5,218,777		
Income - (Induced)	\$1,596,423		
Income - Total (place of work)	\$6,815,199	0.61%	
Employment - Direct	163		
Employment - Induced	44		
Employment - Total	207	0.72%	
Local Population	0		
Local Off-base Population	0	0%	

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	8.51 %	7.3 %	5.87 %	3.53 %
Negative RTV	-5.39 %	-6.04 %	-5.31 %	-1.07 %

EIFS REPORT

PROJECT NAME

BRAC EA - Marshall Alternative 5

STUDY AREA

48203 Harrison, TX

FORECAST INPUT

Change In Local Expenditures		\$4,800,000
Change In Civilian Employment		68
Average Income of Affected Civilian		\$35,050
Percent Expected to Relocate		0
Change In Military Employment		0
Average Income of Affected Military		\$0
Percent of Military Living On-post		0

FORECAST OUTPUT

Employment Multiplier	2.27		
Income Multiplier	2.27		
Sales Volume - Direct	\$4,601,716		
Sales Volume - Induced	\$5,844,179		
Sales Volume - Total	\$10,445,900	0.7%	
Income - Direct	\$2,774,001		
Income - (Induced)	\$850,037		
Income - Total (place of work)	\$3,624,038	0.33%	
Employment - Direct	87		
Employment - Induced	24		
Employment - Total	110	0.39%	
Local Population	0		
Local Off-base Population	0	0%	

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	8.51 %	7.3 %	5.87 %	3.53 %
Negative RTV	-5.39 %	-6.04 %	-5.31 %	-1.07 %

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APPENDIX D – LEGAL AND REGULATORY FRAMEWORK FOR BRAC CLOSURE, DISPOSAL, AND REUSE PROCESS

On September 8, 2005, the Defense BRAC Commission recommended closure of the Marshall USARC in Marshall, Texas. This recommendation was approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission’s recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense BRAC of 1990 (Public Law 101-510), as amended.

The BRAC Commission made the following recommendations concerning the Marshall USARC:

“Close the United States Army Reserve Center, Tyler, TX, and the United States Army Reserve Center, Marshall, TX, and relocate units to a new Armed Forces Reserve Center with a Field Maintenance Shop in Tyler, TX, if the Army is able to acquire suitable land for the construction of the facilities. The new AFRC shall have the capability to accommodate Texas National Guard Units from the following Texas ARNG Readiness Centers: Athens, Tyler, Henderson, Kilgore, Marshall, and Corsicana, TX, and the Field Maintenance Shop in Marshall, TX, if the state decides to relocate those National Guard units.”

To implement these recommendations, the Army proposes to close the Marshall USARC.

The law that governs real property disposal is the Federal Property and Administrative Services Act of 1949 (40 U.S.C., Sections 471 and following, as amended). This law is implemented by the Federal Property Management Regulations at Title 41 CFR Subpart 101-47. The disposal process is also governed by 32 CFR Part 174 (Revitalizing Base Closure Communities) and 32 CFR Part 175 (Revitalizing Base Closure Communities—Base Closure Community Assistance), regulations issued by DoD to implement BRAC law, and matters known as the Pryor Amendment and the President’s Program to Revitalize Base Closure Communities.

Relevant Statutes and Executive Orders

A decision on how to proceed with the Proposed Action rests on numerous factors such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations, the Army is guided by relevant statutes (and their implementing regulations) and Executive Orders (EO) that establish standards and provide guidance on environmental and natural resources management and planning. These include the Clean Air Act, Clean Water Act, Noise Control Act, Endangered Species Act, National Historic Preservation Act, Archaeological Resources Protection Act, Resource Conservation and Recovery Act, and Toxic Substances Control Act. EOs bearing on the Proposed Action include:

- EO 11988 (Floodplain Management)
- EO 11990 (Protection of Wetlands)
- EO 12088 (Federal Compliance with Pollution Control Standards)
- EO 12580 (Superfund Implementation)
- EO 12873 (Federal Acquisition, Recycling and Waste Prevention)

EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations)

EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks)

EO 13175 (Consultation and Coordination with Indian Tribal Governments)

EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds)

EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management)

These authorities are addressed in various sections throughout this EA when relevant to particular environmental resources and conditions. The full texts of the laws, regulations, and EOs are available on the Defense Environmental Network & Information Exchange website at <http://www.denix.osd.mil>.

Other Reuse Regulations and Guidance

DoD's Office of Economic Adjustment published its Community Guide to Base Reuse in May 1995. The guide describes the base closure and reuse processes that have been designed to help with local economic recovery and summarizes the many assistance programs administered by DoD and other agencies. DoD published its DoD Base Reuse Implementation Manual to serve as a handbook for the successful execution of reuse plans. DoD and the U.S. Department of Housing and Urban Development have published guidance (32 CFR Part 175) required by Title XXIX of the National Defense Authorization Act for Fiscal Year 1994. The guidance establishes policy and procedures, assigns responsibilities, and delegates authority to implement the President's Program to Revitalize Base Closure Communities (July 2, 1993), as endorsed through Congressional enactment of the Pryor Amendment.