
FINAL ENVIRONMENTAL ASSESSMENT

FOR BRAC 05 CLOSURE AND DISPOSAL AND REUSE OF OSWALD U.S. ARMY RESERVE CENTER (FACID WA010) EVERETT, WASHINGTON



prepared for

U.S. Army Reserve 88th Regional Support Command

prepared by

U.S. Army Corps of Engineers

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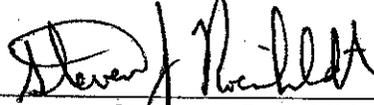
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FOR BRAC 05 CLOSURE AND DISPOSAL AND REUSE OF OSWALD
U.S. ARMY RESERVE CENTER (FACID WA010)
EVERETT, WASHINGTON

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ENVIRONMENTAL ASSESSMENT

LEAD AGENCY: Mobile District, U.S. Army Corps of Engineers

TITLE OF PROPOSED ACTION: Environmental Assessment for BRAC 05 Closure and Disposal and Reuse of Oswald U.S. Army Reserve Center (FACID WA010), Everett, Washington

AFFECTED JURISDICTIONS: Snohomish County, Washington

PREPARED BY: Steven J. Roemhildt, Colonel, U.S. Army Corps of Engineers, Mobile District, District Commander.

APPROVED BY: Kurt F. Wagner, Colonel, U.S. Army Director, Public Works

ABSTRACT: On September 8, 2005, the Defense Base Realignment and Closure (BRAC) Commission recommended closure of the Oswald U.S. Army Reserve Center (USARC) (actual name of the facility is the Major David P. Oswald USARC) and realignment of essential missions to a new USARC. These recommendations were 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's recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law [PL] 101-510), as amended.

The deactivated USARC property is excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. Pursuant to the National Environmental Policy Act (NEPA) of 1969 and its implementing regulations, the Army has prepared this Environmental Assessment (EA) to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.

None of the predicted effects of the Proposed Action would result in significant impacts to the quality of the human or biological environment in Everett, Washington. Moreover, mitigation would not be necessary to offset impacts. Therefore, preparation of an Environmental Impact Statement is not required and a Finding of No Significant Impact (FNSI) will be published in accordance with NEPA.

REVIEW PERIOD: A Notice of Availability (NOA) for the EA and draft FNSI was published in the Everett Herald on January 6, 2012. In the NOA, interested parties were invited to review and comment on

the EA and draft FNSI during the 30-day comment period from January 6, 2012 through February 5, 2012. The EA and draft FNSI were accessible via the World Wide Web at:

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

Copies of the EA and draft FNSI were also made available during the review period at the following local library:

Everett Public Library
2702 Hoyt Avenue
Everett, WA 98201

Reviewers were invited to submit comments on the EA and draft FNSI during the 30-day comment period electronic mail to: Meline.skeldon@usar.army.mil

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission recommended closure of the Oswald U.S. Army Reserve Center (USARC) and realignment of essential missions to a new USARC to be constructed at a new location. This recommendation was made in conformance with the provisions of the BRAC Act of 1990, (Public Law [PL] 101-510) as amended. The deactivated USARC property is excess to Army military needs and will be disposed of according to applicable laws, regulations, and national policy. Pursuant to the National Environmental Policy Act (NEPA) of 1969 and its implementing regulations, the Army has prepared this environmental assessment (EA) to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.

ES.2 BACKGROUND AND SETTING

The Oswald USARC is located on the west central portion of Snohomish County, Washington, on the northern side of the City of Everett. Everett, the largest city and county seat of Snohomish County, is an approximately 47.7-square-mile community located south of the Snohomish River, 25 miles north of Seattle. Everett is bordered by Lake Stevens to the east, Marysville to the north, Puget Sound to the west, and Mill Creek to the South. Table ES-1 lists environmental resources and corresponding statutes, regulations, and executive orders.

Table ES-1: Major Environmental Statutes, Regulations, and Executive Orders Applicable to Federal Projects

Environmental Resources	Statute, Regulation, or Executive Order
Air	Clean Air Act of 1970 (PL 95-95), as amended in 1977 and 1990 (PL 91-604); U.S. Environmental Protection Agency (U.S. EPA), Subchapter C-Air Programs (40 Code of Federal Regulations [CFR] 52-99)
Noise	Noise Control Act of 1972 (PL 92-574) and Amendments of 1978 (PL 95-609); U.S. EPA, Subchapter G-Noise Abatement Programs (40 CFR 201-211)
Water	Federal Water Pollution Control Act of 1972 (PL 92-500) and Amendments; Clean Water Act of 1977 (PL 95-217); U.S. EPA, Subchapter D-Water Programs (40 CFR 100-145); Water Quality Act of 1987 (PL 100-4); U.S. EPA, Subchapter N-Effluent Guidelines and Standards (40 CFR 401-471); Safe Drinking Water Act of 1972 (PL 95-923) and Amendments of 1986 (PL 99-339); U.S. EPA,

Environmental Resources	Statute, Regulation, or Executive Order
	National Drinking Water Regulations and Underground Injection Control Program (40 CFR 141-149)
Biological Resources	Migratory Bird Treaty Act of 1918; Fish and Wildlife Coordination Act of 1958 (PL 85-654); Sikes Act of 1960 (PL 86-97) and Amendments of 1986 (PL 99-561) and 1997 (PL 105-85 Title XXIX); Endangered Species Act of 1973 (PL 93-205) and Amendments of 1988 (PL 100-478); Fish and Wildlife Conservation Act of 1980 (PL 96-366); Lacey Act Amendments of 1981 (PL 97-79); Responsibilities of Federal Agencies to Protect Migratory Birds (Executive Order [EO] 13186)
Wetlands and Floodplains	Section 401 and 404 of the Federal Water Pollution Control Act of 1972 (PL 92-500); U.S. EPA, Subchapter D-Water Programs 40 CFR 100-149 (105 ref); Floodplain Management-1977 (EO 11988); Protection of Wetlands-1977 (EO 11990); Emergency Wetlands Resources Act of 1986 (PL 99-645); North American Wetlands Conservation Act of 1989 (PL 101-233)
Cultural Resources	National Historic Preservation Act (NHPA) (16 USC 470 et seq.) (PL 89-865) and Amendments of 1980 (PL 96-515) and 1992 (PL 102-575); Protection and Enhancement of the Cultural Environment-1971 (EO 11593); Indian Sacred Sites-1966 (EO 13007); American Indian Religious Freedom Act of 1978 (PL 94-341); Antiquities Act of 1906; Archaeological Resources Protection Act of 1979 (PL 96-95); Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (PL 101-601); Protection of Historic and Cultural Properties (36 CFR 800)
Solid/Hazardous Materials and Waste	Resource Conservation and Recovery Act (RCRA) of 1976 (PL 94-5800), as Amended by PL 100-582; U.S. EPA, Subchapter I-Solid Wastes (40 CFR 240-280); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 (42 USC 9601) (PL 96-510); Toxic Substances Control Act (TSCA) (PL 94-496); U.S. EPA, Subchapter R-Toxic Substances Control Act (40 CFR 702-799); Federal Insecticide, Fungicide, and Rodenticide Control Act (40 CFR 162-180); Emergency Planning and Community Right-to-Know Act (40 CFR 355, 370, and 372); Federal Compliance with Pollution Control Standards-1978 (EO 12088), Superfund Implementation (EO 12580); Strengthening Federal Environmental, Energy, and Transportation Management (EO 13423)
Health and Safety	Occupational Health and Safety Act of 1970 (29 CFR 1910 and 29 CFR 1926)
Environmental Justice	Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations (EO 12898); Protection of Children from Environmental Health Risks and Safety Risks (EO 13045)

ES.3 PROPOSED ACTION

After the Oswald USARC is closed, the Army will dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense (DoD) and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose (Everett, 2009a).

The Everett City Council applied for and was designated as the Local Redevelopment Authority (LRA) for the Oswald USARC facility by the Office of Economic Adjustment on February 20, 2008 (Everett,

2009a). In accordance with 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 (NOI) from state and local governments, representatives of the homeless, and other interested parties. Following a public hearing on June 16, 2009, the LRA voted to adopt the Traditional Disposal and Reuse Plan for the Oswald USARC, which recommends that the Oswald USARC be transferred to the Domestic Violence Services of Snohomish County. Based on the LRA recommendation, the Army proposes to dispose of the Oswald USARC as a single parcel for reuse as a shelter to victims of domestic violence and associated services.

ES.4 REALIGNMENT PROCESS

The timeline for implementing the action at the Oswald USARC began in late 2005 with Congressional and Presidential approval of the BRAC law. Under BRAC law, the Army must close the Oswald USARC not later than September 15, 2011.

ES.5 ALTERNATIVES

No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Oswald USARC at levels similar to those that occurred prior to the BRAC Commission's recommendations for closure becoming final. Implementation of the No Action Alternative is not possible due to the BRAC Commission's recommendation to close the Oswald USARC having the force of law. However, inclusion of the No Action Alternative is prescribed by the Council on Environmental Quality (CEQ) regulations implementing NEPA, and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated. Therefore, the No Action Alternative is evaluated in the EA.

Caretaker Status Alternative

Under the Caretaker Status Alternative, the Army would secure the Oswald USARC after the military mission has ended to ensure public safety and the security of remaining government property and any required environmental remediation actions. There may be a period between closure and the transfer of the Oswald USARC. From the time of operational closure until conveyance of the property, the Army would provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the Oswald USARC was not transferred within an agreed-to period of time, under this alternative, the Army would reduce maintenance levels to the minimum level for surplus

government property as specified in 41CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-70 (Buildings and Structures).

Preferred Alternative: Traditional Disposal and Reuse

Under the Preferred Alternative, the Army would close the Oswald USARC by September 15, 2011, for reuse by the Domestic Violence Services (DVS) of Snohomish County for purposes recommended by the LRA in the Oswald USARC Reuse Plan (Appendix A) as described below.

- The DVS would reuse the existing structures at Oswald to shelter victims of domestic violence and their children. It would also provide a service center for 24-hour crisis line, support group, and advocacy services.
- The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide the support of the victims of domestic violence, and a daycare for children of residents of the emergency shelter.
- If approved by Everett City Council, DVS would propose that the southern portion of the site be developed at a later date with 20 transitional housing units to serve women and children who are leaving the shelter.

The existing administration building would be remodeled to house the agency's non-shelter services, including group meeting rooms, a flexible multi-purpose room, separate rooms for staff to interview and counsel domestic violence victims, and staff offices. The building would also shelter support functions such as laundry facilities, storage, and a computer server room. This alternative is fully evaluated in the EA.

ES.6 ENVIRONMENTAL CONSEQUENCES

Under the No Action Alternative, the Army would continue operations at the Oswald USARC and no new environmental impacts would occur.

Under the Preferred and Caretaker Status alternatives, the Proposed Action would not have any significant adverse effects or impacts on any of the environmental or related resource areas at Oswald or to areas surrounding the USARC. For all resource areas, the effects are evaluated to be at no effect or no significant effect levels.

A summary of impacts by resource area for the No Action Alternative and the Preferred Alternative is provided in Table ES-2.

Table ES-2: Summary of the Impacts of the Proposed Action Alternatives

Resource	No Action Alternative	Caretaker Status Alternative	Preferred Alternative
Land Use			
<i>Regional Geographic Setting and Location</i>	No effect.	No effect.	No effect.
<i>Site Land Use</i>	No effect.	No effect.	No significant effect.
<i>Surrounding Land Use</i>	No effect.	No effect.	No effect.
<i>Coastal Barriers and Zones</i>	No effect.	No effect.	No significant effect.
<i>Current and Future Development in the Region of Influence</i>	No effect.	No effect.	No effect.
Aesthetic and Visual Resources	No effect.	No effect.	No significant effect.
Air Quality	No effect.	No effect.	No significant effect.
Geology and Soils			
<i>Geologic and Topographic Conditions</i>	No effect.	No effect.	No significant effect.
<i>Soils</i>	No effect.	No effect.	No significant effect.
Cultural Resources			
<i>Prehistoric and Historic Background</i>	No effect.	No effect.	No effect.
<i>Status of Cultural Resource Inventories and Section 106</i>	No effect.	No effect.	No significant effect.
<i>Native American Resources</i>	No effect.	No effect.	No significant effect.
Socioeconomics			
<i>Economics</i>	No effect.	No effect.	No significant effect.
<i>Environmental Justice</i>	No effect.	No effect.	No significant effect.
<i>Protection of Children</i>	No effect.	No effect.	No significant effect.
Transportation			
<i>Roadways and Traffic</i>	No effect.	No effect.	No significant effect.
<i>Site Transportation</i>	No effect.	No effect.	No significant effect.
<i>Public Transportation</i>	No effect.	No effect.	No significant effect.
Hazardous and Toxic Substances			
<i>Uses of Hazardous Materials</i>	No effect.	No effect.	No significant effect.
<i>Storage and Handling Areas</i>	No effect.	No effect.	No significant effect.

Resource	No Action Alternative	Caretaker Status Alternative	Preferred Alternative
<i>Environmental Condition of Property</i>	No effect.	No effect.	No significant effect.
Cumulative Effects	No effect.	No effect.	No significant effect

ES.7 MITIGATION RESPONSIBILITY

None of the predicted effects of the Preferred Alternative would result in significant impacts; therefore, mitigation is not needed.

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1.0 PURPOSE AND NEED

1.1 INTRODUCTION

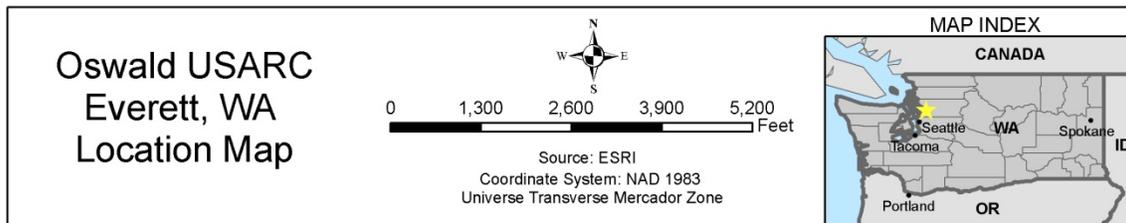
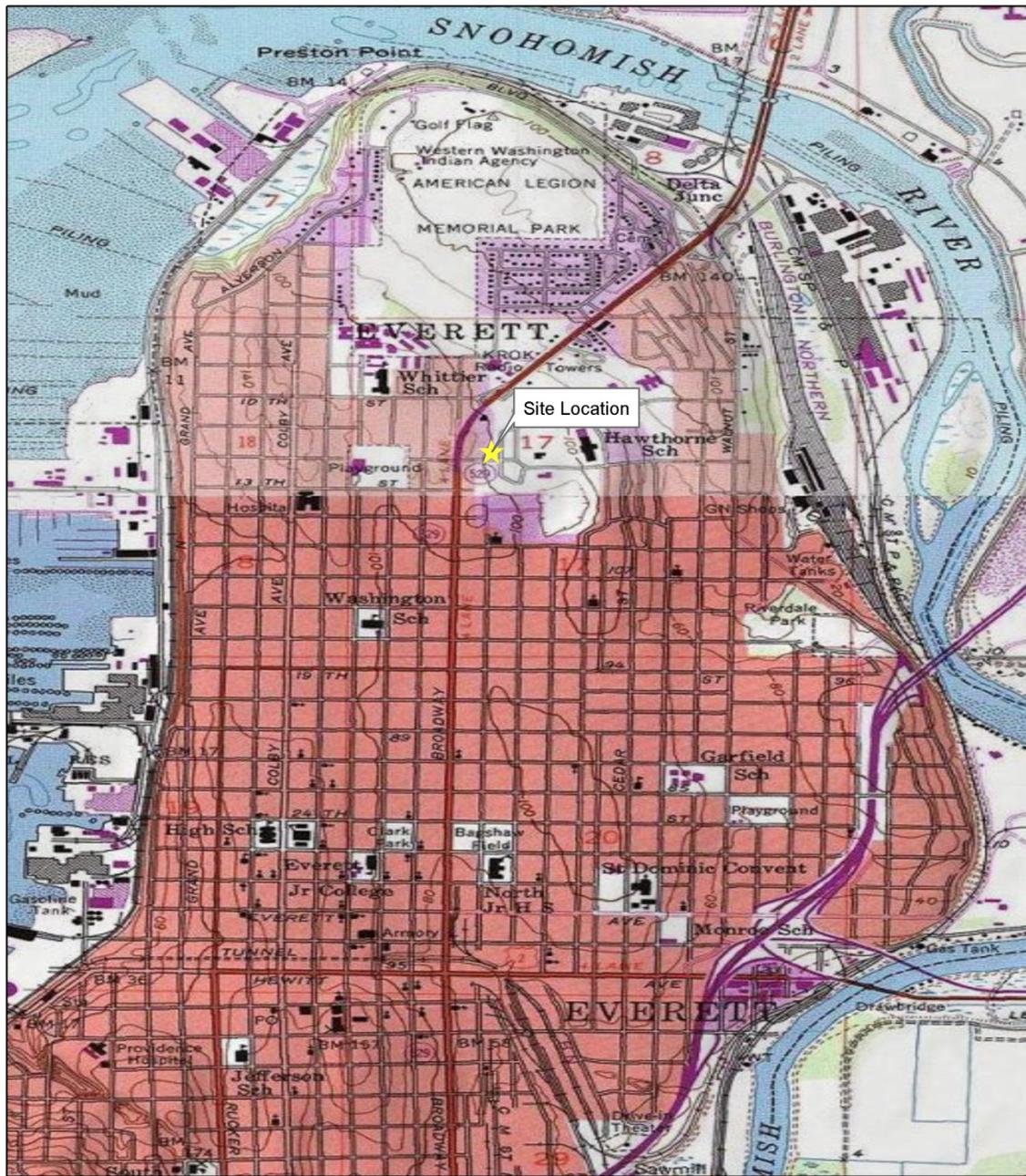
This Environmental Assessment (EA) analyzes the environmental impacts of the proposed closure and reuse of the Major David P. Oswald United States Army Reserve Center (USARC), in Everett, Washington (Figure 1-1). This EA was developed in accordance with the National Environmental Policy Act (NEPA) [42 United States Code (USC) § 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 consequences of the proposed action and alternatives.

1.2 PURPOSE AND NEED

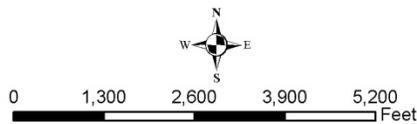
On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission recommended closure of the Oswald USARC and realignment of essential missions to a new USARC to be constructed at a new location. This recommendation was made in conformance with the provisions of the BRAC Act of 1990, (Public Law [PL], 101-510) as amended. The deactivated USARC property is excess to Army military needs and will be disposed of according to applicable laws and regulations.

1.3 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 coordinated or consulted with the State Historic Preservation Officer (SHPO); U.S. Fish and Wildlife Service (USFWS); Native American Tribes; federal, state and local regulatory agencies; state and local governments; non-governmental organizations, individuals; and others as appropriate.



Oswald USARC
 Everett, WA
 Location Map



Source: ESRI
 Coordinate System: NAD 1983
 Universal Transverse Mercator Zone

Figure 1-1: Oswald USARC, Everett, Washington, Location Map

The 30-day public review period begins by placing a Notice of Availability (NOA) of the EA and a draft Finding of No Significant Impact (FNSI) in the local Everett newspaper, The Herald. The EA and draft FNSI are available during the public review period at the Everett Public Library, 2702 Hoyt Avenue, Everett, Washington, 98201, and on the BRAC website at <http://hqda.army.mil/acsim/brac/brac>. The Army invites the public and all interested and affected parties to review and comment on this EA and the draft FNSI. Comments and requests for information should be submitted to the BRAC Environmental Coordinator for the 88th Regional Support Command (RSC): Ms. Meline Skeldon at meline.skeldon@usar.army.mil, 130 ½ 228th Street SW, Bothell, WA 98021.

At the end of the 30-day public review period, the Army reviews all comments received; compares environmental impacts associated with reasonable alternatives; revises the FNSI or the EA, if necessary; supplements the EA, if needed; and makes a decision. If the impacts of the proposed action are not significant, the Army may execute the FNSI and the action may proceed immediately. If potential impacts are found to be significant, the Army may decide to (1) not proceed with the proposed action, (2) proceed with the proposed action after committing to mitigation reducing the anticipated impact to a less than significant impact in the revised Final FNSI, or (3) publish a Notice of Intent (NOI) to prepare an Environmental Impact Statement in the Federal Register.

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2.0 DESCRIPTION OF THE PROPOSED ACTION

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

Under BRAC law, the Army must close the Oswald USARC not later than September 15, 2011. After the Oswald USARC is closed, the Army will dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense (DoD) and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

2.1 BRAC COMMISSION'S RECOMMENDATION

The Proposed Action, the disposal and reuse of the Oswald USARC in Everett, WA, follows the BRAC Commission's recommendation,

Close the Oswald United States Army Reserve Center, Everett, WA, and relocate units to a new Armed Forces Reserve Center in the Everett, WA area if the Army is able to acquire suitable land for construction of the new facility.

2.2 LOCAL REDEVELOPMENT AUTHORITY'S REUSE PLAN

On February 20, 2008, the Everett City Council, Washington, passed a resolution establishing the Oswald USARC Local Redevelopment Authority (LRA) for the purpose of formulating a recommendation for the reuse of the Oswald USARC (Everett, 2009a). Pursuant to the Federal Property Administrative Services Act of 1949 and the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, the LRA screened this Federal Government surplus property by soliciting notices of interest from state and local governments, representatives of the homeless, and other interested parties. Following a public hearing on June 16, 2009, after reviewing three reuse proposals and recommendations and all public comments, the LRA recommended that the property be reused for domestic violence services. The LRA reuse plan was approved by the Everett Planning Commission on June 16, 2009. The Department of Housing and Urban Development approved the plan on October 19, 2010. In accordance with the LRA reuse plan, the Army proposes to transfer the property to Domestic Violence Services (DVS) of Snohomish County by a public sale for reuse as described in the approved LRA in the Oswald USARC Reuse Plan (Appendix A).

2.3 DESCRIPTION OF THE OSWALD USARC (THE “PROPERTY”)

In 1943, the U.S. Government was granted 3 acres of land from the Everett Improvement Company, located at 1110 Rainier Avenue, Everett, Washington (S17 T29N R5E Willamette Meridian) to construct an Army Reserve Center. Since the U.S. Government acquired the land, it has served as a reserve and mobilization center for the USAR (USACE, 2007). Currently, the property has four permanent structures:

- 11,800-square-foot main administration building (Figure 2-2: Oswald Hall)
- 2,500-square-foot Organizational Maintenance Shop (OMS) (Figure 2-3)
- Brick storage shed
- Three-sided cinderblock hazardous materials (hazmat) structure

Figure 2-1 shows the Oswald USARC site plan. The administration building consists of a one-story, concrete foundation and concrete block walls covered with a brick exterior building. The OMS is also one-story and concrete foundation construction. The storage shed is brick and the three-sided hazardous materials structure is made of cinderblock. A 2-acre military-equipment parking (MEP) area and a half acre privately owned vehicle (POV) parking area are also on the site. Approximately 90 percent of the site is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining 10 percent of land is covered by lawn, gravel and a sparse population of landscape shrubs and trees (USACE, 2007). With the exception of the POV parking area, chain-link security fencing encloses the site. The site was previously used by one Army unit with 66 reservists who drill on weekends and nine full-time employees. During development of this EA, the units were relocated to the new facility and this USARC is currently vacant pending disposal.

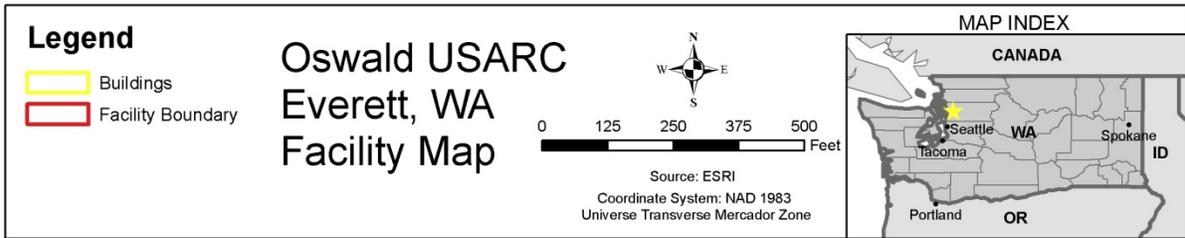


Figure 2-1: Oswald USARC, Everett, Washington, Facilities Map



Figure 2-2: Oswald Hall



Figure 2-3: Organizational Maintenance Shop

3.0 ALTERNATIVES TO THE PROPOSED ACTION

3.1 NO ACTION ALTERNATIVE

Under the No Action Alternative, the Army would continue operations at the Oswald USARC at levels similar to those that occurred prior to the BRAC Commission's recommendations for closure becoming final. Implementation of the No Action Alternative is not possible because the BRAC Commission's recommendation to close the Oswald USARC has the force of law. However, 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. Therefore, the No Action Alternative is evaluated in the EA.

3.2 CARETAKER STATUS ALTERNATIVE

Under the Caretaker Status Alternative, the Army would secure the Oswald USARC after the military mission has ended to ensure public safety and the security of remaining government property and any required environmental remediation actions. There may be a period between closure and the transfer of the Oswald USARC. From the time of operational closure until conveyance of the property, the Army would provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment.

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

3.3 TRADITIONAL DISPOSAL AND REUSE (PREFERRED ALTERNATIVE)

Under the Preferred Alternative, the Army would close the Oswald USARC by September 15, 2011, for reuse by the DVS of Snohomish County for purposes recommended by the LRA in the Oswald USARC Reuse Plan (Appendix A) as described below.

The DVS would reuse the existing structures at Oswald to shelter victims of domestic violence and their children. It would also provide a service center for 24-hour crisis line, support group, and advocacy

services. The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide support for the victims of domestic violence, and a daycare for children of residents of the emergency shelter.

- Phase I – Main Administrative Building: The existing administration building would be remodeled to house the agency’s non-shelter services, including group meeting rooms, a flexible multi-purpose room, separate rooms for staff to interview and counsel domestic violence victims, and staff offices. The building would also shelter support functions such as laundry facilities, storage, and a computer server room. Because military building standards do not necessarily coincide with local or state building codes, reuse of the buildings would require some renovations prior to receiving approval for use by the local Building Official and the Fire Marshall. Renovations to accommodate the future reuses and to meet appropriate building codes may include the following:
 - Removal of existing walls;
 - Building new walls;
 - Window enlargements.

- Phase I – Attached Gymnasium and Kitchen: Attached to the main administrative building is a gymnasium and complete commercial kitchen. This structure would be turned into a 60-bed domestic violence shelter. Along with the kitchen facilities, the first floor would act as the “living room” for a children’s play area, TV viewing, eating space, group activities, and sleeping rooms for mobility impaired clients. Each sleeping room would have its own toilet and sink with shared tub/shower. Another option would be to construct a new shelter structure to the north or south of the gymnasium. This depends on city regulations, including the City’s Consolidated Plan, permitting the constructions. Renovations to accommodate the future reuses and to meet appropriate building codes may include the following:
 - A second floor would be added to the gymnasium. The roof would not need to be raised and would include interior renovations only.
 - The addition of 2,000 square feet in the gymnasium for additional handicapped sleeping rooms and shelter staff offices.

- Phase II – Day Care Center, Vehicle Maintenance Facility: DVS proposes to remodel the OMS for use as a child care facility. In the short term, the facility would be used for storage. All renovations would be on the interior of the structure.
- Phase III – Transitional Housing: If the Everett City Council amends the Consolidated Housing Plan to allow new construction of publicly subsidized housing on the Oswald USARC property, DVS would eventually like to construct a 20-unit facility to provide transitional housing. If approved, construction of the transitional housing would start approximately 36 months after DVS came into possession of the property and construction would last for 12 months. The construction would be located on the southern portion of the property along the 12th Street boundary.

Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and since there was a final LRA Reuse Plan upon which to base the NEPA analysis.

3.4 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER ANALYSIS

3.4.1 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. One method is to transfer the property to a new owner who agrees to perform, or to allow the Army to perform, all remedial actions required under applicable Federal and state requirements. Allowing the property to be transferred before cleanup is complete requires concurrence of environmental authorities and the governor of the affected state. The property must be suitable for the new owner's intended use, and the intended use must be consistent with protection of human health and the environment. Another method is to lease the property to a non-Army entity to allow reuse of the property during cleanup and then to transfer the property when all remedial actions have been completed.

The Environmental Condition of Property (ECP) Report for the Oswald USARC property indicated the release or disposal of petroleum products or their derivatives has occurred in an area of the property. This was based on the contaminated soils associated with former heating oil underground storage tanks (USTs) (USACE, 2007). The contaminated soils were transported to an off-site treatment and disposal facility and no additional action was required by the local regulatory agency. Since no further remedial action is required, this alternative was not carried forward for further analysis.

3.4.2 Other Reuse Alternatives

The Oswald USARC LRA screened this Federal Government 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 the Redevelopment and Homeless Assistance Act of 1994. The LRA received three NOIs to consider.

- The DVS of Snohomish County proposed to remodel the existing buildings as an emergency shelter for victims of domestic violence; administrative offices for supporting staff; and a daycare for children of the shelter.
- Everett Community College (ECC) sought to use the existing property and buildings for public safety training programs for law enforcement and fire/medic emergency services as an expanded component of existing educational programs at the nearby ECC campus.
- The Archdiocesan Housing Authority of Seattle/Catholic Community Services proposed to partner with a non-profit homeless service provider and develop permanent housing for homeless veterans.

The LRA recommended the proposal from the DVS of Snohomish County in the Oswald USARC Reuse Plan which is described in the Preferred Alternative (Section 3.3).

Because the other alternatives were not selected by the Oswald USARC LRA as their official Reuse Plan, they are not carried forward for further analysis in this EA.

4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

4.1 ENVIRONMENTAL RESOURCES ELIMINATED FROM FURTHER CONSIDERATION

Army NEPA Regulations (32 CFR Part 651.14) state that the NEPA analysis should reduce or eliminate the discussion of minor issues to help focus the analyses. This approach minimizes unnecessary analysis and discussion during the NEPA process and in analysis documents. The CEQ regulations for implementing NEPA (40 CFR Part 1500.4(g)) emphasizes the use of the scoping process, not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the environmental assessment/environmental impact statement process.

4.1.1 Environmental Resources that are Not Present

Floodplains – There are no floodplains located within 1,000 feet of the USARC site (BHE, 2009). A review of the Federal Emergency Management Agency Flood Insurance Rate Map, Community Panel 5301640001B indicates that the USARC site is located outside but within close proximity to both the 100- and 500-year floodplains (USACE, 2007).

Wetlands – During a 2009 site survey, no wetland areas were observed. According to the National Wetlands Inventory, there is a palustrine shrub/scrub wetland located approximately 650 feet southeast of the site. An area of “Wetlands,” a Washington Department of Fish and Wildlife (WDFW) designated priority habitat, was reported by Washington Natural Heritage Program approximately 550 feet southeast of the site. WDFW priority habitats are not afforded regulatory or legal protection (BHE, 2009). Stormwater runoff from the property flows toward the northeast and does not impact the wetland.

National and State Parks – The nearest national park is Olympic National Park, which is located approximately 60 miles from the property. The nearest state park is Mukilteo State Park, which is located approximately 11 miles from the property.

Wilderness Areas and Wildlife Refuges – The nearest national wilderness area is within Olympic National Park, which is located 60 miles from the property. The nearest national wildlife refuge is Dungeness, which is located 75 miles from the property.

National Wild and Scenic Rivers – The nearest National Wild and Scenic River is the Skagit River, which is located approximately 30 miles from the property.

Prime or Unique Wildlife Habitat – The property is in an urban setting, is highly disturbed, lacks natural habitat, and the USFWS has not designated critical habitat on or in the vicinity of the property (see Appendix B).

Surface Water – There are no surface water features located on or within 1,000 feet of the property. The Snohomish River to the east and Possession Sound to the west are both located approximately 3/4-mile from the USARC site. Approximately one mile north of the USARC site, the Snohomish River discharges to the Possession Sound (USACE, 2007).

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.

Radon Gas – Snohomish County is designated as inZone 3, with a low potential for indoor radon, well below the U.S. Environmental Protection Agency's (U.S. EPA's) recommended maximum allowable exposure level of 4.0 picocuries per liter (USACE, 2007). A site-specific radon survey was conducted at the property in 2007. The average radon level ranged from 0.6 picocuries per liter in the main building to 1.2 picocuries per liter in the OMS (Shaw Environmental, 2007). Radon levels were within accepted limits.

4.1.2 Environmental Resources that are Present, but not Impacted

Groundwater drinking quality, availability, or use – The Puget Trough, which lies in the western Washington area, is described to contain lake beds, alluvium, and glacial deposits. Because soils located on the USARC site are likely till, significant shallow groundwater may not exist within the project area. Based on nearby borehole data, what little groundwater may be present in the project area is expected to be between 10 and 15 feet below land surface. Groundwater flow for the USARC site is reported toward the north-northeast, west, and northwest. This divergent flow is most likely due to surface water bodies east, north, and west of the USARC site (USACE, 2007). Under Phases I and II of the proposed action, renovations would only occur within the existing structures and no new impervious surfaces would be introduced, resulting in no impacts to groundwater. Under Phase III the proposed construction would occur on the southern portion of the site. However, the majority of the site is already impervious surface and the depth of excavations would not reach depth levels of groundwater; therefore no impacts to groundwater would occur. Since there would be no impact to groundwater, it was dismissed from full analysis.

Public Services – Because there would be no change in the baseline population two resources, *Housing* and *Quality of Life*, which include public services and are normally addressed under the Socioeconomic impact topic, are not evaluated in this EA.

Federal- and State-Listed Threatened, Endangered, or Candidate Species – No rare, threatened, or endangered species or natural communities of concern are known to occur in the vicinity of the project location. No suitable habitat for listed species was observed at the USARC. Wildlife observed at a 2009 natural resource survey site visit included the bald eagle (*Haliaeetus leucocephalus*), northwestern crow (*Corvus caurinus*), a regional high priority species, and rock pigeon (*Columba livia*). The bald eagle was recorded as a flyover observation only and no suitable habitat for the bald eagle exists on the property. No state-listed species have been documented on or within 1,000 feet of the USARC (BHE, 2009). On April 8, 2011, the USFWS concurred in informal consultation that threatened and endangered species would not be affected. No response was received from the WDFW. See Appendix B for all consultation letters.

4.1.3 Environmental Resources that are Present, but the Proposed Action would have little to no Measureable Effect on these Resources

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

- City of Everett (water provider) – Current water supply at the site is provided through a 6-inch and 8-inch water main that is girded to other water mains in the area. Sanitary service is provided through an 18-inch sanitary sewer line. Current usage of these lines is not available, but can be provided with an appropriate reference. All capacities are sufficient to provide adequate service for the proposed reuse of the site (Brooks, 2011).
- City of Everett (stormwater) – The majority of the property is covered with impervious surfaces, buildings, and paved parking. Stormwater runoff flows are directed towards the southern portion of the project site and are collected through a single drain, which then feeds into the 18 inch sanitary sewer line. Phase I would not impact stormwater direction, flow, or volume. Phase II and III construction activities associated with, lateral extensions to the gym and construction of 20 housing units is assumed to effect/disturb less than one-acre and therefore will not require an NPDES construction permit and all construction will utilize best management practices to minimize the effects of construction on stormwater as listed in the Stormwater Management Manual for Western Washington (WSDOE, 2005).

- Puget Sound Energy (natural gas provider) – Two 5/8 inch gas lines currently provide natural gas to the site, with a limit of 1,800,000 cubic feet per minute (CFM) at one line and 300,000 CFM at the other. Current usage rates at the site were unavailable, but were confirmed to be well below the existing capacity. The current capacity should be sufficient for the reuse of the site as described under the preferred alternative (Lane, 2011).
- Rubatino Refuse (solid waste) – Existing capacity at the site is a 3-yard trash receptacle that is collected once a week. Usage varies from month to month, but is typically below the maximum capacity of the receptacle. Due to size limitations on the site, a larger container to meet increased demand is not expected; however, more frequent collections would be reasonable (Rubatino Refuse, 2011).
- Snohomish County Public Utility District (Electrical service and distribution provider) – Capacity at the site is currently limited due to the use of single-phase electrical power, typical of small residential and commercial buildings whose primary electrical use is lighting and heating. Current usage of electricity at the site is minimal, ranging from 12,000 to 14,000 kilowatt/hours (kw/h) every 60 days. This number is low enough that further extensive usage data is not available. Although current capacity is limited, a single-phase system should be sufficient to meet the requirements of the proposed action under the Preferred Alternative. If further demand increases to levels not sufficiently provided for by a single-phase system, a change to a three-phase system would be needed (Kelso, 2011).

Vegetation – Approximately 86 percent of the property at the Oswald USARC is covered by impervious surface features such as paved road/parking areas and building footprints (BHE, 2009). Maintained grass and shrub/scrub areas account for approximately 14 percent of the property. The maintained lawn at the Oswald USARC is dominated by Kentucky bluegrass (*Poa pratensis*) in the herbaceous layer, redbud (*Cercis canadensis*) in the shrub layer, and sweetgum (*Liquidambar styraciflua*) in the canopy layer. In addition to a maintained lawn, non-dominant invasive-exotic species observed at the site include field bindweed (*Convolvulus arvensis*), Scotch broom (*Cytisus scoparius*), English ivy (*Hedera helix*), common St. Johnswort (*Hypericum perforatum*), hairy cat's ear (*Hypochaeris radicata*), and old-man-in-the-Spring (*Senecio vulgaris*) (BHE, 2009). These invasive-exotic species are present in low densities at the site.

Noise – None of the alternatives would have a significant direct, indirect, or cumulative impact on noise levels. The major sources of noise would continue to be from daily commuter vehicle traffic and the building's heating, ventilation, and air conditioning (HVAC) system. The Army classifies areas with

noise levels from these sources as Zone 1, compatible with all land uses, including residential. Existing major sources of noise are daily commuter vehicle traffic and the building's HVAC system.

Under the No Action Alternative, noise from these sources would remain unchanged. Under the Caretaker Status Alternative, these noise sources would be reduced since there would be no commuter vehicles daily and minimal operation of the HVAC system. Under the Preferred Alternative, the major noise sources would be the HVAC system, daily commuter traffic from POVs, and the day-to-day activities of the DVS. The Army classifies areas with noise levels from these sources as Zone 1, compatible with all land uses, including residential. During construction, the DVS would adhere to all noise regulations for construction equipment and work hours, ensuring no significant impact on the surrounding residences. Therefore, any change in noise levels resulting from implementation of the Preferred Alternative would not be significant. The nearest sensitive noise receptor is the mobile home residences, which are directly adjacent to the property.

Wildlife – Birds observed at the Oswald USARC include bald eagle (Partners in Flight (PIF) high regional priority species), northwestern crow (PIF high regional priority species), and rock pigeon. The bald eagle was recorded as a flyover observation only. Mammals observed at the site include the gray squirrel (*Sciurus carolinensis*) and eastern cottontail (*Sylvilagus floridanus*). No amphibians and reptiles have been observed at the property (BHE, 2009).

4.2 INTRODUCTION

This section describes the current environmental conditions of the areas that would be affected should the Proposed Action be implemented. It also analyzes the potential effects arising from implementing the Proposed Action. The description of environmental conditions represents the baseline conditions, or the “as is” or “before the action” conditions at the installation and is defined as the level of operations and environmental conditions as of 2011. The baseline facilitates subsequent identification of changes in conditions that would result from the realignment. The environmental consequences portion represents the culmination of scientific and analytic analysis of potential effects arising from implementing the Proposed Action. Direct, indirect, and cumulative effects of the Proposed Action are also addressed.

For each environmental resource area the baseline conditions are presented first followed immediately thereafter by evaluation of the potential impacts of the No Action and the two action alternatives. Where appropriate and definable, a specific Region of Influence (ROI) is indicated for a given resource area.

4.3 LAND USE

4.3.1 Affected Environment

This section describes existing land use conditions on and surrounding the Oswald USARC. It considers natural land uses and land uses that reflect human modification. Natural land use classifications include wildlife areas, forests, and other open or undeveloped areas. Human land uses include residential, commercial, industrial, utilities, agricultural, recreational, and other developed uses. Management plans, policies, ordinances, and regulations determine the types of uses that are allowable, or protect specially designated or environmentally sensitive uses. The following sections discuss the regional geographic setting, location, and climate; site land use; surrounding land use; and current and future development.

4.3.1.1 Regional Geographic Setting and Location

The Oswald USARC is located on the west central portion of Snohomish County, Washington, on the northern side of the City of Everett. Everett, the largest city and county seat of Snohomish County, is an approximately 47.7-square-mile community located south of the Snohomish River, 25 miles north of Seattle. Everett is bordered by Lake Stevens to the east, Marysville to the north, Puget Sound to the west, and Mill Creek to the South.

The average temperature of Everett, Washington is 51 degrees Fahrenheit. The coldest month is December, with an average temperature of 40 degrees Fahrenheit. The warmest month is August with an average temperature of 64 degrees Fahrenheit (Weather Channel, 2011). The average annual rainfall is 37.5 inches per year, with the great distribution of 5.1 inches in November and the fewest of 1.2 in July (Weather Channel, 2011).

4.3.1.2 Site Land Use

In 1943, the U.S. Army acquired 3 acres of property from the Everett Improvement Company that would become the Oswald USARC. The previous use of the site is unknown. Since the U.S. Government acquired it, the land has served as a reserve and mobilization center for the USAR. The site currently functions as a maintenance facility and an administrative center. Reserve members are a part of the 671st engineering company and 66 reservists previously reported to the site on the weekends although field training for the engineering unit occurs elsewhere. There were nine full-time employees, who have been relocated.

Oswald Hall consists of administrative offices, classrooms, a kitchen, storage rooms, boiler room, and a drill hall. The OMS building contains two vehicle service bays, an office, storage room, and loft area used

for storage. The building is being used for the general servicing of vehicles and as a storage center. The brick shed situated west of the OMS building was being used to store petroleum, oil, and lubricants (POLs), however this use has function was transferred to a three-sided hazmat storage structure on the site in 1990 (Figure 2-1).

Approximately 90 percent of the site is covered with impervious surfaces (e.g., asphalt parking areas, driveways, concrete walkways and building footprints), of which 74 percent is paved roads and parking. The remaining ground surface is grass-covered lawn areas and a sparse population of landscaped shrubs and trees. Oswald USARC is zoned as B-2, Commercial Business (USACE, 2007).

4.3.1.3 Surrounding Land Use

The area surrounding the USARC is zoned as commercial and residential. The Oswald USARC is bounded by a residential mobile-home park and single-family housing to the west. The nearest residencies are the mobile home units to the west, approximately 5 feet from the fence separating the USARC from the homes. Rainer Avenue bounds the USARC to the east, followed by the Meadows Apartments, a multi-family apartment complex. College Shopping Plaza strip mall borders the Oswald USARC to the north. Although some shops remain open, the majority of the strip mall is vacant. To the south the USARC is bound by 12th Street, followed by Everett Plaza Retirement Community and the Cascadian Apartments (USACE, 2007).

4.3.1.4 Coastal Barriers and Zones

As a Federal undertaking, the act of disposing of excess federal property is subject to the Federal Coastal Zone Management Act (CZMA) of 1972, which states that Federal agency activities must be consistent with a state's federally approved Coastal Management Program (CMP). Coastal zone management is administered through the Washington State Department of Ecology and the CMP is known as the Washington's Coastal Zone Management Program. The federal regulations that implement the consistency provision of the CZMA are found at 15 CFR Part 930. These regulations establish the procedures to be followed to ensure that a federal agency's activities are consistent with the enforceable policies of the Washington CMP. The types of activities that are covered by these regulations are

- Activities directly undertaken by, or on behalf of, federal agencies;
- Activities requiring authorizations or other forms of approval from federal agencies;
- Activities involving financial assistance from federal agencies; and
- Outer continental shelf activities.

Federal consistency provisions apply to activities both in the state's coastal area and outside of the coastal area when the activities would affect coastal resources or coastal land and water uses (see 15 CFR 930.11(b) and 15 CFR 930.11(g)). The state of Washington's coastal zone is composed of 15 counties. Each of the counties borders saltwater, either on the Pacific Ocean or Puget Sound, as well as Wahkiakum County along the Columbia River which has high salt quantities in that location. The coastal zone includes all lands and waters from the coastline seaward for 3 nautical miles. Coastal zones also include Special Area Management Plans for defined areas with resource management problems irresolvable within the framework of existing federal, state, or local regulatory or management program (WSDOE, 2001).

The Oswald USARC is not located in an area with a Special Area Management Plan in one of the 15 counties that comprise Washington's coastal zone; however, it is within 3 nautical miles of the coastline. Therefore, federal disposal of this excess property is subject to a consistency review by the Washington State Department of Ecology (WSDOE). A consultation letter was sent to WSDOE on August 4, 2011. WSDOE replied on September 9, 2011, and stated that they concurred with the determination and assessment that the proposal is consistent, to the maximum extent practicable, with the Washington Coastal Zone Management Plan enforceable policies (see Appendix B).

4.3.1.5 Current and Future Development in the Region of Influence

There are a number of current and future projects occurring in the immediate vicinity and nearby area of the site. The property that is currently occupied by the College Shopping Plaza directly north of the Oswald USARC is owned by ECC. Currently, ECC is using the site for student parking and vacant stores for storage. As funding becomes available and if enrollment increases, there are plans to develop the site as a further expansion of the college. At ECC's main campus, on the west side of Broadway, construction was recently completed on a new recreation center. Approximately one quarter-mile east of the Oswald USARC a number of World War II (WWII) housing remains that is currently owned by the Everett Housing Authority. Although no development is currently taking place, the housing authority has proposed to construct mixed market rate and subsidized housing at this location. One half-mile southwest of the USARC, Providence Regional Medical Center is finishing construction on a new hospital tower and one quarter-mile south of the USARC the Community Health Center of Snohomish County is under construction. Mixed-use redevelopment of the Broadway Corridor is also proposed; however, a timeline for the project is unavailable (Giffen, 2011).

4.3.2 Environmental Consequences

Impacts to land use were determined by the following criteria:

No Effect – No impacts to surrounding land use from the proposed project.

No Significant Effect – The impact to land use would be measurable or perceptible, but would be limited to a relatively small change in land use that is still consistent with the surrounding land uses and would conform with zoning and community land use plans and policies.

Significant Effect – The impact to land use would be substantial. Land uses are expected to substantially change in the short and long term. The action would not be consistent with the surrounding land use and would not conform with zoning and community land use plans and policies.

4.3.2.1 No Action Alternative

Under the No Action Alternative, the Army would continue use of the Oswald USARC and no land use changes or impacts would occur, resulting in no effect to land use.

4.3.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, land use would change from an active military reserve center to a facility under caretaker status. Maintenance activities to preserve and protect the facilities would take place. These activities would not conflict with applicable ordinances, existing land use plans, or surrounding land use, and would result in no effect on land use.

4.3.2.3 Traditional Disposal and Reuse - Preferred Alternative

Under the Traditional Disposal and Reuse Alternative, the Oswald USARC buildings and real estate would be transferred to the DVS of Snohomish County. The site would be used as an emergency shelter for domestic violence victims and their children and would provide a 24-hour crisis line, support groups, and advocacy services. In addition, the site would house administrative services and provide a daycare for children of residents of the shelter.

The main administration building at Oswald Hall and attached gymnasium and commercial kitchen as well as the OMS would be used, with alterations to accommodate the new uses. Renovations to accommodate the future reuses and to meet appropriate building codes include the removal of existing walls and the construction of new walls as well as window enlargements in the existing main

administration building. Renovations to the attached gymnasium and kitchen include the addition of a second floor to the gymnasium and the addition of 2,000 square feet in the gym. Based on reuse, changes to the HVAC, plumbing, and electrical would also occur. These changes are compatible with zoning, ordinances, community land use plans, and existing land uses in the vicinity of the property.

If the 20-unit housing complex is approved for construction, it would also be compatible with zoning and existing land uses. The change in land use from a USARC used for training and administration to a shelter and service center for victims of domestic violence would alter the numbers and types of individuals that use the facility. The Reserve Center is operated by 9 full-time employees and 66 reservists use the center to conduct classroom training and vehicle maintenance one weekend each month. The proposed domestic violence shelter would operate 7 days a week with 16 full-time employees who would provide counseling and advocacy services to approximately 10 people daily. Shelter would be provided to a maximum of 45 people at any given time during Phase I and II. Once Phase III is complete, a maximum of 80 additional people could be provided shelter daily in the 20-unit complex. While there would be more people using the site at any given time, the use would be mostly residential in nature and would be more consistent with the surrounding land uses. The reuse of this property for DVS purposes would have no significant effect on land use.

Overall, impacts to land use from closure, transfer, construction, and reuse would not be significant. Land use of the USARC would change from a military site to a DVS and administrative facility.

4.4 AESTHETICS AND VISUAL RESOURCES

4.4.1 Affected Environment

Geographically, the Oswald USARC is located in the City of Everett in the northwest region of Washington State. The property consists of a total of 3 acres (BHE, 2009) of mixed-used zoned land (Everett, 2009b). The general visual character of the area can be described as urban medium-density with surrounding medium- and high-density multi-family communities to the east, west, and south. A commercial shopping plaza lies to the north of the property and an athletic field and school lie to the east behind a multi-family housing complex. The topography of the site and vicinity is relatively flat, ranging from 97 to 102 feet above mean sea level (USACE, 2007). The site is surrounded by a mix of high- and medium-density multi-family residential communities, some small patches of grass and various commercial business establishments. Vegetation in the vicinity of the property is composed of narrow sections of maintained grass and shrub and scrub brush. A few trees are located on both the east and west sides of the property, and there is a fenced-in athletic field approximately one-tenth of a mile east of the

property (BHE, 2009). There are no designated protected viewsheds or historic resources in the vicinity of the site (Jimerson, 2011). However, the mixed-use zone in which the property resides has a maximum zoning height of 80 feet (Everett, 2010). The property contains one USARC building, one OMS building, two additional buildings, and associated parking areas. A chain-link fence surrounds the entire property.

4.4.2 Environmental Consequences

To evaluate the alternatives, the following criteria have been established to define the level of impacts to visual resources:

No Effect – No impacts to the view shed of any historic resources and/or the aesthetic character of the installation from the proposed project.

No Significant Effect – No significant permanent direct or indirect impacts to the existing aesthetic quality of the site and its surroundings would be expected from the proposed project. The project would not substantially degrade the visual character or quality of the site as viewed from off-site vantage points. Any temporary visual disturbances that substantially alter the character of the site would be returned to its original state following the action.

Significant Effect – The proposed action would result in a substantial effect on the existing aesthetic quality of the site and its surroundings; substantially alter scenic resources, including but not limited to, trees and historic buildings; or substantially degrade the visual character or quality of the site as viewed from off-site vantage points. The effect would significantly diminish overall integrity, or would significantly alter character defining features of the site.

4.4.2.1 No Action Alternative

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

4.4.2.2 Caretaker Status Alternative

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

4.4.2.3 Preferred Alternative – Traditional Disposal and Reuse

Under the Preferred Alternative the existing facilities would be reused by the DVS of Snohomish County. Some renovations to the gymnasium, OMS, and Oswald USARC Hall would likely be needed to meet the

needs of the DVS; however, renovations would primarily be limited to the interior spaces and would not affect the exterior facade of these buildings with the exception of some renovations to existing windows that would be required to meet existing fire codes. If the Everett City Council amends the Consolidated Housing Plan to allow new construction of publicly subsidized housing on the Oswald USARC property, then the DVS could build a new 20-unit traditional housing complex to serve women and children who are leaving the shelter. These housing units would, in general, not significantly differ from the surrounding types of multi-unit housing and mobile homes on adjacent properties (Everett, 2009a).

Short-term adverse impacts to aesthetics would occur from ground disturbance; the presence of workers, vehicles, equipment; and the generation of dust and vehicle exhaust associated with the remodeling of the main administrative building and the attached gymnasium and kitchen as well as the gym expansion. Additionally, impacts from façade improvements to exterior windows and construction waste could occur, but would be temporary. Once demolition and construction are complete, the reclamation of the site would remove these visual impacts. Adverse impacts could also occur during the construction of the proposed 20-unit traditional housing complex on the south end of the property. The development of this complex would have a long-term adverse impact on aesthetics if the chosen exterior design were substantially at variance with the design and materials of nearby structures. Visual impacts from the gym expansion would be expected to be minimal, as similar building materials would be used. The temporary aesthetic impacts associated with the construction of this project would end once construction is complete. Impacts would not be significant as all construction or renovation would be expected to match the exterior of the existing building.

4.5 AIR QUALITY

The U.S. EPA defines ambient air in 40 CFR Part 50 as “that portion of the atmosphere, external to buildings, to which the general public has access.” In compliance with the 1970 Clean Air Act (CAA) and the 1977 and 1990 Clean Air Act Amendments (CAAA), the U.S. EPA has promulgated National Ambient Air Quality Standards (NAAQS). The NAAQS include primary standards which set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. To date, the U.S. EPA has issued NAAQS for seven criteria pollutants: carbon monoxide (CO), sulfur dioxide (SO₂), particles with a diameter less than or equal to a nominal 10 micrometers (PM₁₀), particles with a diameter less than or equal to a nominal 2.5 micrometers (PM_{2.5}), ozone (O₃), nitrogen dioxide (NO₂), and lead (Pb). Individual states may promulgate their own ambient air quality standards for these “criteria” pollutants, provided that they are at least as stringent as the federal standards. Table 4-

1 presents both State of Washington and federal primary ambient air quality standards for criteria air pollutants.

Table 4-1: State and Federal Ambient Standards for Criteria Air Pollutants

Pollutant	Averaging Period	Federal Primary Standard	Washington State Standard
Ozone	8-hour	0.075 ppm	Same as Federal
	1-hour (daily max.)	0.12 ppm	Same as Federal
PM_{2.5}	Annual (arithmetic mean)	15.0 µg/m ³	Same as Federal
	24-hour	35 µg/m ³	Same as Federal
PM₁₀	Annual (arithmetic mean)	NA	50 µg/m ³
	24-hour	150 µg/m ³	150 µg/m ³
Carbon Monoxide	8-hour	9 ppm	9 ppm
	1-hour	35 ppm	35 ppm
Nitrogen Dioxide	Annual (arithmetic mean)	0.053 ppm	0.05 ppm
	1-hour	0.100 ppm	Same as Federal
Sulfur Dioxide	Annual (arithmetic mean)	0.03 ppm	0.02 ppm
	24-hour	0.14 ppm	0.10 ppm
	1-hour (per annum)	NA	0.40 ppm
	1-hour (per 7 days)	NA	0.25 ppm
	5-minute	NA	0.80 ppm
Lead	Rolling 3-month average	0.15 µg/m ³	Same as Federal
	Quarterly average	1.5 µg/m ³	Same as Federal
Total Suspended Particulate	Annual (geometric mean)	NA	60 µg/m ³
	24-hour	NA	150 µg/m ³
Sources: USEPA, 2011a; WADOE, 2011. ppm = parts per million µg/m ³ = micrograms per cubic meter			

4.5.1 Affected Environment

Areas that have experienced persistent air quality problems are designated by the U.S. EPA as nonattainment areas. The U.S. EPA had previously designated 13 areas in Washington State as in nonattainment, including Snohomish County (State of Washington, Department of Ecology, 2011), which was in non-attainment for the CO and O₃ standards. On October 11, 1996, the county was redesignated as being in attainment for CO. On June 15, 2004, the U.S. EPA revoked the 1-hr standard for ozone,

replacing it with the current 8-hour standard. The county is classified by the U.S. EPA as being in attainment for each of the criteria pollutants described above.

To regulate the emission levels resulting from a project, federal actions located in non-attainment areas are required to demonstrate compliance with the general conformity guidelines established in 40 CFR Part 93 *Determining Conformity of Federal Actions to State or Federal Implementation Plans* (the Rule). The proposed action is not located within a non-attainment area; therefore, a General Conformity Rule applicability analysis is not warranted.

4.5.1.1 Ambient Air Quality Conditions

PM_{2.5} is the primary pollutant of concern in Snohomish County and comes mainly from combustion related to solid fuel home-heating devices (Lundblad, 2011). Ambient air quality is currently monitored in Snohomish County by stations meeting the U.S. EPA’s design criteria for State and Local Air Monitoring Stations (SLAMS) and National Air Monitoring Stations (NAMS). Currently there are no active monitoring sites in the City of Everett. The closest air monitoring station within Snohomish County is located in the Town of Marysville, which is approximately 10 miles north from downtown Everett. At this monitor location, the 24-hour standard for PM_{2.5} was exceeded an average of four times each year since 2006, spiking in 2007 and 2009 with eight exceedences. Table 4-2 presents the highest 24-hour average values for each of these pollutants recorded at this station from 2006 through 2010.

Table 4-2: Existing PM2.5 Monitoring Data for Snohomish County, WA

Monitoring Station (AQS Site ID# / Location)	Pollutant	Year*				
		2006	2007	2008	2009	2010
#53-061-1007 / 1605 7TH ST, MARYSVILLE, WA	PM _{2.5}	41.8	45.7	31.3	45.1	27.2
*PM _{2.5} values are in micrograms per cubic meter (µg/m ³); NAAQS: PM _{2.5} : 24-hr average = 35 µg/m ³ Source: PSCAA, 2011						

4.5.1.1 Meteorology and Climate

Oswald USARC is located in Everett, Washington, which is in Snohomish County. Snohomish County maintains a moderate climate year-round, with average temperature of 51 degrees Fahrenheit (The Weather Channel, nd).

4.5.1.2 Regional Air Pollutant Emissions Summary

The U.S. EPA calculates the Air Quality Index (AQI) for five major air pollutants regulated by the CAA: ground-level O₃, PM, CO, SO₂, and NO₂. The U.S. EPA collects data daily to determine air quality for the region, and releases it in the form of the AQI, which runs from 0 to 500, with 0 being no air pollution and 500 representing hazardous air pollution levels. An AQI value between 101 and 150 indicates that air quality is unhealthy for sensitive groups who may be subject to negative health effects. Sensitive groups may include those with lung or heart disease who would be negatively affected by lower levels of ground level ozone and particulate matter than the rest of the general public. An AQI value between 151 and 200 is considered to be unhealthy and may result in negative health effects for the general public, with more severe effects possible for those in sensitive groups. AQI values from 200 to 300 are considered to be very unhealthy and AQI values above 300 are considered hazardous (USEPA, 2011b). AQI data derived from recent and ongoing monitoring in the Town of Marysville are presented in Table 4-3.

Table 4-3: AQI Data for Town of Marysville

Year	Unhealthy for Sensitive Groups (Days)	Unhealthy for General Public (Days)
2006	1	0
2007	3	0
2008	0	0
2009	8	0
2010	0	0

Lundblad, 2011.

4.5.1.3 Greenhouse Gases

There is broad scientific consensus that humans are changing the chemical composition of Earth's atmosphere. Activities such as fossil fuel combustion, deforestation, and other changes in land use are resulting in the accumulation of trace greenhouse gases (GHGs), such as CO₂, in our atmosphere. An increase in GHG emissions is said to result in an increase in the Earth's average surface temperature, which is commonly referred to as global warming. Global warming is expected, in turn, to affect weather patterns, average sea level, ocean acidification, chemical reaction rates, precipitation rates, etc., which is commonly referred to as climate change. The Intergovernmental Panel on Climate Change best estimates are that the average global temperature rise between 2000 and 2100 could range from 0.6 degrees Celsius (°C) (with no increase in GHG emissions above year 2000 levels) to 4.0°C (with substantial increase in

GHG emissions). Even small increases in global temperatures could have considerable detrimental impacts on natural and human environments.

GHGs include water vapor, carbon dioxide (CO₂), methane, nitrous oxide, O₃, and several hydrocarbons and chlorofluorocarbons. Each GHG has an estimated Global Warming Potential (GWP), which is a function of its atmospheric lifetime and its ability to absorb and radiate infrared energy emitted from the Earth's surface. A gas's GWP provides a relative basis for calculating its Carbon Dioxide Equivalent (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.

Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* sets as a goal for all federal agencies the improvement of energy efficiency and the "reduc[tion] of greenhouse gas emissions of the agency, through reduction of energy intensity by (i) 3 percent annually through the end of fiscal year 2015, or (ii) 30 percent by the end of fiscal year 2015, relative to the baseline to the agency's energy use in fiscal year 2003" (Federal Register, 2007). The U.S. Army Energy Strategy for Installations also contains strategies to reduce energy waste and improve efficiency. As a result, the impact the proposed action may have on GHG emissions has been analyzed in this EA.

4.5.2 Environmental Consequences

To assess the magnitude of impacts to air quality in the area of the project sites, the following impact thresholds were used.

No Effect – Air quality would not be impacted or the impact to these resources would be below or at the lower levels of detection. Any impacts would be slight.

No Significant Effect - Impacts to air quality would be detectable. Impacts would not increase ambient air pollution above any NAAQS.

Significant - Impacts to air quality would be readily apparent and result in a change to the character of the resource over a relatively wide area. Impacts would increase ambient air pollution above the NAAQS and/or contribute to an existing violation of the NAAQS. Mitigation measures would be necessary to offset adverse impacts and may or may not be successful.

4.5.2.1 No Action Alternative

Under this alternative, the Army would continue operations at the Oswald USARC at levels similar to those that occurred prior to the BRAC Commission's recommendations for closure becoming final. Therefore, implementing the No Action Alternative would not change current conditions and would have no effect on air quality.

4.5.2.2 Caretaker Status Alternative

The Caretaker Status Alternative would result in a reduction of current emissions as only small amounts of emissions associated with maintenance activities would continue to occur. The building would not be used and would therefore not produce boiler emissions or emissions generated from commuter vehicle trips other than those to perform maintenance activities. No construction, renovation or interior painting would be completed. As a result, the Caretaker Status Alternative would have no effect on air quality.

4.5.2.3 Preferred Alternative – Traditional Disposal and Reuse

A full air quality analysis was performed for the Preferred Alternative. The air quality impact analysis estimated the level of potential air emissions for both construction and operation of the proposed reuse. Nitrogen oxides (NO_x) and volatile organic compounds (VOCs) were analyzed as precursors to ozone. NO_x is also analyzed for the criteria pollutant, NO₂. There would be no lead emissions from on-road vehicles because those vehicles use unleaded fuel. The amount of lead emitted from construction equipment and heating sources was negligible and did not yield emissions above one thousandth of a ton (0.000) and was not included in the analysis report. Full calculations and assumptions are provided in Appendix D.

Table 4-4 summarizes the total emissions associated with the construction and operation phases of the Preferred Alternative. Construction related emissions would be temporary and only occur during the construction period for all phases; however, a conservative approach was initially employed in the analysis to ensure that construction scheduling would not result in higher levels of emissions than predicted. The analysis assumed that the construction emissions for all of the buildings would occur concurrently over the same 1-year period and were then combined with a full year of operational emissions.

Table 4-4: Summary of Emissions – Traditional Disposal and Reuse

Activity	Total Annual Emissions (TPY)					
	NO _x	VOC	PM _{2.5}	PM ₁₀	SO ₂	CO
<i>de minimis</i> levels	100	100	100	100	100	100
Construction	3.207	0.743	0.164	0.167	0.078	0.846
Full Operation	0.408	0.662	0.013	N/A	0.006	6.203
TOTAL COMBINED	3.615	1.405	0.177	0.167	0.084	7.049

The results in Table 4-4 show that the emissions associated with the construction and operation of the building by DVS, when compared to the *de minimis* values, fall well below the *de minimis* levels for all pollutants, even under the initial conservative assumptions that were employed. As a result, implementation of the Preferred Alternative would result in no significant impacts to air quality.

Greenhouse Gases

To determine the direct emissions of GHG from the Preferred Alternative, this analysis used the estimate provided in the Oswald USARC Reuse Plan, which estimated the DVS would require employees and conversations with staff at the DVS estimated there would be an additional 28 daily visitors to the facility (Bruland, 2011). The analysis assumed both visitors and employees would drive 40 miles round trip daily. The analysis utilized the U.S. EPA's *MOBILE6* air modeling system to determine the grams per mile emitted by both smaller cars and small trucks or sport utility vehicles (SUVs). For a conservative analysis, it was assumed all vehicles would be small SUVs or trucks.

The average CO₂ emission in grams per mile (g/mi) in Snohomish County is 478.7 grams per mile for a Light Duty Gas Truck less than 6000 lbs (small truck or SUV). Therefore, given the estimate of 40 miles per trip, 365 days a year for visitors and 240 days a year for employees, direct vehicle emissions from the Preferred Alternative would be:

$$\text{Employees: } (40 \text{ mi})(25 \text{ trips})(240 \text{ days})(478.7 \text{ g/mi}) / (453.59 \text{ g/lb}) / (2000 \text{ lb/ton}) = 111.973 \text{ TPY}$$

$$\text{Visitors: } (40 \text{ mi})(28 \text{ trips})(365 \text{ days})(478.7 \text{ g/mi}) / (453.59 \text{ g/lb}) / (2000 \text{ lb/ton}) = 190.728 \text{ TPY}$$

Additional emissions would occur during the construction phases of the project; however these emissions would be one-time emissions and were not included in the analysis.

The activities associated with existing USARC would be relocated within the same air quality control region. Therefore, there would be no net addition to global carbon dioxide emissions from the relocated USARC operations.

As a result, the Preferred Alternative would not produce a significant amount of GHG emissions. This alternative is expected to cause direct emissions of 302.701 metric tons of CO₂e annually, which is below the recommended screening level for including a quantitative and qualitative assessment of GHG emissions of 25,000 metric tons of CO₂e emissions annually.

This action would not represent a net incremental addition to the global climate change phenomenon.

4.6 GEOLOGY AND SOILS

4.6.1 Affected Environment

This section describes the existing geology and soil conditions in the area of the Oswald USARC. Geologic and topographic conditions are discussed first, followed by soils.

4.6.1.1 Geologic and Topographic Conditions

The Oswald USARC is relatively flat to very gently sloping toward the east and north. The elevation of the site ranges from 97 to 102 feet above mean sea level. The facility is located within the Puget Trough physiographic province. The Puget Trough, which lies in the western Washington area, is described to contain lake beds, alluvium, and glacial deposits. This section is characterized by rolling to level plains of glacial drift deposited by recent continental glaciations. Geological formations at the site are Pleistocene (moraine) formations. The glacial deposits are weathered and are “parent material for Red and Yellow Podzols” and are dated pre-Wisconsin in age, approximately 110,000 years ago. The Wisconsin and younger deposits are parent material for Gray-Brown Podzols. The portion of Everett that the site is situated on is most likely characterized by Wisconsin-age glacial till (dense clay, silt, sand, and gravel mixtures) (USACE, 2007).

Historical data of seismic activity indicate that earthquakes in Washington cause negligible to moderate damage. The majority of the largest earthquakes felt in Washington occur in the Puget Sound region between Olympia and the Canadian border, along the western side of the Cascade Mountains and along the Washington-Oregon border, with none being centered in the vicinity of the site. Primary causes of the earthquakes in close proximity to the site occur due to the sub-ducting of the Juan De Fuca plate. Although earthquakes are not rare, early earthquakes are not precisely known. In general, earthquakes

occurring in the Puget Sound area have lacked aftershocks, a characteristic of deep earthquakes. However, in 1872, the Cascade Mountains were the location of the largest earthquake in Seattle and earthquakes in this area tend to have multiple aftershocks. Sixteen earthquakes of intensity VII or greater on the Modified Mercalli Scale have been recorded originating in Washington. In addition, two earthquakes originated in British Columbia and four originated in Oregon that were felt in Washington. Intensity VII earthquakes cause negligible damage to buildings of good design and construction, slight to moderate damage in well-built ordinary structures; considerable damage in poorly built or badly designed structures; with some chimneys broken. These earthquakes are noticed by persons driving motor vehicles (Noson et al., n.d.)

4.6.1.2 Soils

The Oswald USARC is covered by soils represented by two mapping units: Alderwood-urban land unit (2–8 percent slopes), and the urban land unit (Figure 4-1). The eastern and northeast portion of the Oswald USARC is covered by urban land. This unit comprising pavement, buildings, and other artificially covered areas that obscure or alter the soils so that identification is not possible (USDA, 1983). The western, southwest, northwest, and central portions of the site are covered by Alderwood-urban land complex (2-8 percent slopes), which is moderately deep and moderately well drained and has moderately rapid permeability with a slight susceptibility to water erosion (USDA, 1983). The Alderwood-urban land complex and urban land complex cover approximately 1.8 and 1.2 acres of the Oswald USARC, respectively (USDA, 2010).

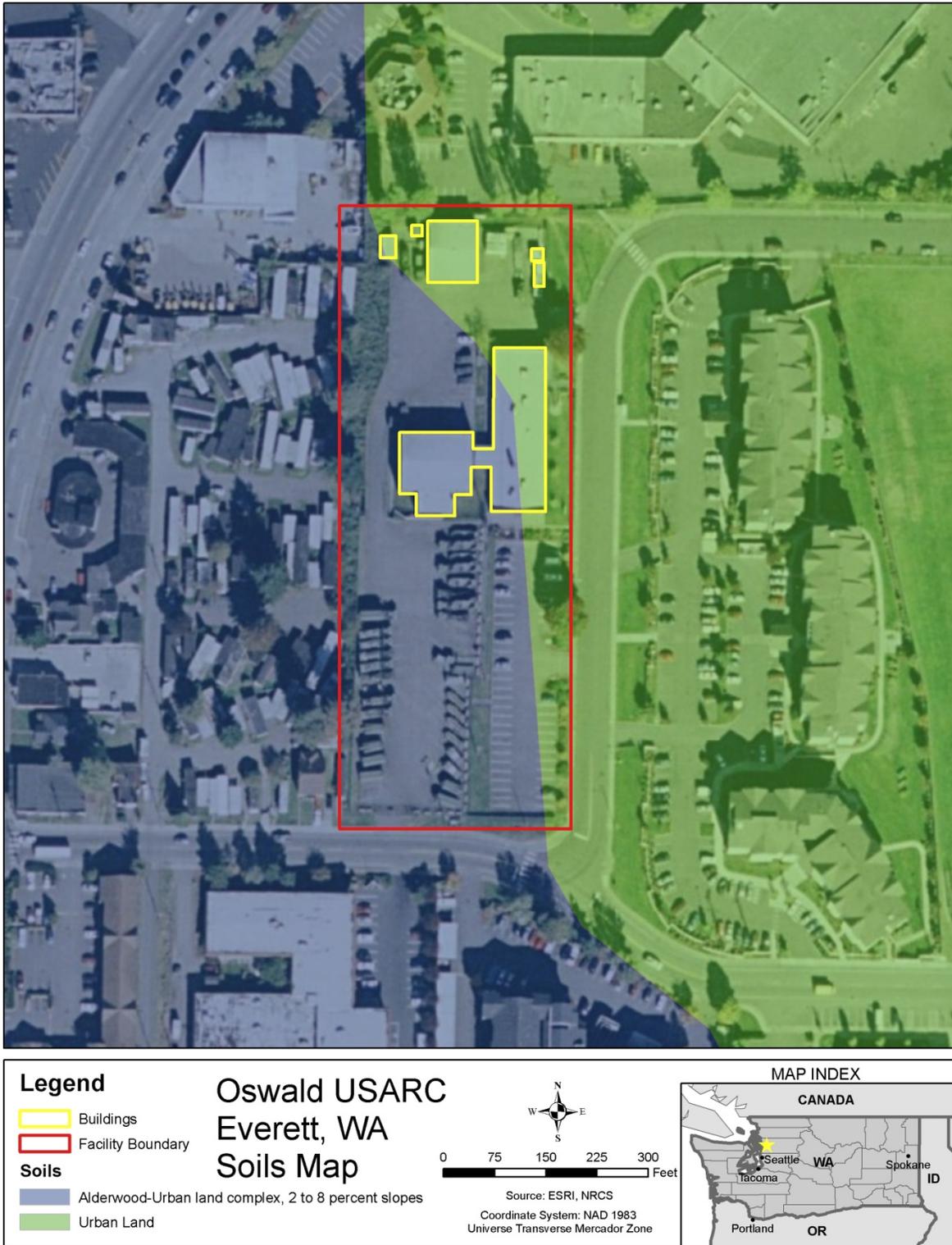


Figure 4-1: Soils in the Project Area

4.6.2 Environmental Consequences

To assess the magnitude of impacts to geology, topography, and soils in the area of the project sites, the following impact thresholds were used.

No Effect – Geology, topography, or soils would not be impacted or the impact to these resources would be below or at the lower levels of detection. Any impacts would be slight.

No Significant Effect – Impacts to geology, topography, or soils would be detectable. Impacts to undisturbed areas would be proportionally small to the site.

Significant – Impacts on geology, topography, or soils would be readily apparent and result in a change to the character of the resource over a relatively wide area. Mitigation measures would be necessary to offset adverse impacts and may or may not be successful.

4.6.2.1 No Action Alternative

No impacts would be expected. Implementing of the No Action Alternative would not alter the existing soils or geologic conditions at Oswald USARC.

4.6.2.2 Caretaker Status Alternative

No impacts would be expected. Implementing of the Caretaker Status Alternative would not alter the existing soils or geologic conditions at Oswald USARC.

4.6.2.3 Traditional Disposal and Reuse - Preferred Alternative

Geologic and Topographic Conditions – No significant effects to geologic or topographic conditions would be expected. The site is relatively flat though it does slope slightly toward the east and north. Construction activities that include the removal of existing walls, building of new walls and window enlargements as well as the addition of the second floor to the gymnasium and the addition of 2,000 square feet in the gymnasium could allow for some cutting and filling of the site, however considerable alterations to the general topographic character of the site would not occur. During Phase III, additional construction on the site would occur, however limited grading would be required due to the flat nature of the site. Impacts to the geography and topography of the site would not be significant.

Soils – No significant effect to soils would be expected. Due to the slight slope of the site, some cut and fill of soils would likely be needed during additions to the gymnasium on the site resulting in the soil layer structure being disturbed and modified. In addition, construction activities associated with Phase III

would disturb and modify the soil structure and displace existing soil. However, these impacts would not be considered significant since the soils have already been previously disturbed and modified and because of the relatively small amount of soil affected.

Soil productivity, (i.e., the capacity of the soil to produce vegetative biomass), would decline in disturbed areas and completely eliminated for those areas within the footprint of building structures. These effects would not be considered significant in light of the fact that the facilities would be developed on previously disturbed soils in an urbanized area.

Soil erosion and sediment production would be minimized for all construction operations as a result of following an approved sediment and erosion control plan. The proposed site would be revegetated (as necessary) following construction activities, and soil erosion and sediment control measures would be included in site plans to minimize long-term erosion and sediment production.

4.7 CULTURAL RESOURCES

This section presents information on buildings, sites, structures, districts, and objects eligible for or included in the National Register of Historic Places (NRHP); cultural items as defined in the National Historic Preservation Act of 1966 (NHPA) and its implementing regulations at 36 CFR 800; Native American sacred sites for which access is protected under the American Indian Religious Freedom Act of 1978; archaeological resources as defined by the Archaeological Resources Protection Act of 1979; and archaeological artifact collections and associated records as defined by 36 CFR Part 79.

Section 106 of NHPA consultations are complete for the current proposed BRAC action, and are detailed in subsequent sections.

4.7.1 Affected Environment

4.7.1.1 Prehistoric and Historic Background

The following information is excerpted from the *Historic Building Survey of Maj. David P. Oswald United States Army Reserve Center (WA010)* (USACE, 2011).

The vicinity of Oswald USARC was inhabited by the Snohomish tribe, which had a winter village site at Preston Point near the mouth of the Snohomish River. The Snohomish Indians were one of a number of bands of Salish Indians that inhabited the land surrounding the Puget Sound, its islands, the valleys of its tributary streams, and shores north of the Sound. Settlements in the Puget Sound area were oriented to saltwater, river, and inland environments. Salmon and shellfish were staple resources. Fishing stations

along streams were established to harvest fish from runs between September and December. Family groups moved seasonally to harvest resources such as roots, berries, and other plants. Inland groups hunted mammals such as deer, elk, bear, and beaver. Permanent winter villages consisted of cedar plank longhouses in which as many as eight families resided. At other times of the year tribes used temporary pole and mat structures that could be easily transported.

Contact with Euroamericans introduced cloth, kettles, pots, guns, beads, and tobacco into the region as they traded beaver, sea otter, fox, and other furs. Waves of smallpox in 1801 and 1853, and a malaria epidemic in 1830, devastated Native American populations of the Northwest Coast. Pre-Euroamerican populations for the Northwest Coast were as high as 188,344 before the epidemics, but by 1870 Native Americans numbered less than 35,000. Isaac I. Stevens, Governor and *ex officio* Superintendent of Indian Affairs for the Washington Territory, negotiated treaties with the Duwamish, Suquamish, Snoqualme, Snohomish, Stillaguamish, Swinomish, Skagit, Lummi, and other western Washington Tribes in 1855. The treaties created small reservations within Tribes' traditional territories that protected fishing, hunting, and harvesting rights. An uprising by several hundred Indian warriors in the winter of 1855-1856 attacked Seattle, but despite several victories they were unable to remove Euroamericans from the area. Although Governor Steven's treaties assigned reservations to Indian tribes, there was no removal program for groups in the northeastern portion of the Puget South. The Snohomish and other tribes restructured as a confederacy known as the Tulalip Tribe and were moved to a reservation established at Tulalip Bay.

The first settlements in the Puget Sound country focused around Seattle, Olympia, and Port Townsend during the 1850s. Not until the 1880s, when the Northern Pacific Railroad created a connection between Lake Superior and the Puget Sound, did settlement of the territory begin in earnest; nearly 100,000 people came to the Washington Territory during the first two years of the settlement frenzy. The influx of settlers allowed Washington to achieve statehood in 1889.

For the first two decades of its existence, settlement of Port Gardner Bay by Euroamerican settlers focused on logging. But in 1891 rumors spread that the Great Northern Railroad would have its terminus at Everett, which was yet to be built on the peninsula north of Port Gardner Bay. The Everett Land Company was formed in anticipation of the railroad's arrival and the City of Everett was created. Speculation about Everett's prospects reached a greater height as John D. Rockefeller was convinced to invest in the Everett Land Company.

As the country entered a severe economic depression in 1893, the new city floundered. Speculators lost everything when Rockefeller pulled out of the investments he had made. Economic conditions began to

improve in 1897 when James H. Hill bought and reorganized the Everett Land Company as the Everett Improvement Company. During the 1900s immigrants travelled on the Great Northern Railroad to Everett to work in its lumber mills, resulting in a population growth from 8,000 in 1900 to 24,000 in 1910.

The lumber-shingle trade, which dominated Everett's economy, was hurt by the closure of the Panama Canal to commercial trade during World War I, but rebounded after the war ended, the Panama Canal reopened, and market demand for fir and cedar increased. Continued reliance on the lumber market meant that Everett and Snohomish County were hard hit by the Great Depression. The lumber-shingle industry eventually gave way to papermaking, but as the timber industry began to wane in the area, Everett's economy was boosted by the arrival aerospace industry and Boeing in the 1960s.

The site on which Oswald USARC now located was granted to the United States Government in 1943 by the Everett Improvement Company, a Washington Corporation, but initial development of the site does not appear to have occurred until 1959 when the administrative building and OMS were built. As part of the Fiscal Year 1957 DoD appropriations, a large number of new training centers were approved for construction throughout the country. In Washington State, centers were approved to be built in Everett, Mount Vernon, Renton, Seattle, Spokane, and Tacoma. Oswald USARC was approved as a one-unit (200-man) training center, its estimated construction cost at \$184,000.

During the early years of the Cold War, the USAR was an integral part of the era's defense strategy of rapid mobilization of reserve forces. As the postwar Army Reserve lacked facilities for training reservists, the War Department recommended appropriations for land purchase and facility construction. Military strategy changed in 1953 when President Eisenhower took office; his New Look strategy, which relied on amassing nuclear weapons as a war deterrent, detracted from the development of Army Reserve forces. Despite budget setbacks caused by New Look strategy, the USAR continued to grow, as it was considered an inexpensive alternative to an active duty force.

New Look emphasis on technology required Army Reserve centers with classroom, laboratory, and maintenance shop spaces for training; buildings needed to be simple, accessible, and modern in order to attract would-be reservists from all social classes. In addition, the switch to simpler design was necessitated by an even more practical reason: cost. As the Army worked to construct the numerous new reserve facilities, and to do so in an efficient and cost-effective manner, it developed standardized architectural plans that could be constructed with low-cost building materials throughout the country. As one of the standardized plans, Oswald USARC conformed to the general characteristics of the one-unit

(200-man) centers constructed using the 1956 plans completed by Reisner and Urbahn. The OMS was completed at the same time as the administrative/classroom building.

Plans dated November 5, 1957, do not include the wing on the south side of the drill hall; it was a later addition, constructed in the same style as the rest of the building. It appears that the drill hall addition was built between 1981 and 1990; the 1990 aerial photograph clearly shows the addition to the south of the drill hall. The former petroleum, oil, and lubricants storage shed was added in 1962. The flammable material storage building was added to the site in 1999.

The site has functioned as a USARC since its construction in 1959. It was occupied by the 409th Engineering Company from 1962 through 1999. Since that time, it has been occupied by the 671st Engineering Company (USACE, 2007).

4.7.1.2 Native American Resources

Oswald USARC is located within the historic territory of the Tulalip, Suquamish, and Muckleshoot tribes. On March 31, 2011, letters were sent to these tribes to initiate consultation and request their interest in consulting on the project and knowledge of any Traditional Cultural Properties at the location. No responses were received.

4.7.2 Environmental Consequences

Potential impacts to cultural resources have been evaluated based on the extent of resources that are eligible for or listed on the NRHP in the area. This analysis follows the procedures for determining the effects of a Federal undertaking upon historic properties as per Section 106 of the NHPA and its implementing regulations at 36 CFR 800.

For each alternative in the EA, an assessment has been made of what NRHP resources, if any, are within its potential area of impact and the reasonably foreseeable nature and extent of any impact. Usually, cultural resource management plans and underlying historic architectural and archaeological studies for Federal installations provide sufficient data to make this assessment. Where such information is inadequate, the requirement for additional effort to identify historic properties is noted.

The following provides an explanation of the characterization of impacts to cultural resources as “no impact,” “no significant impact,” and “significant impact” in comparison with the terminology of “no effect,” “no adverse effect,” and “adverse effect” used in NHPA.

Section 106 Scale

Per 36 CFR 800.16 (i) *effect* means alteration to the characteristics of a historic property that qualify it for inclusion or eligibility for the NRHP. Per 36 CFR 800.5 (a) (1), the effect becomes *adverse* when “an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.” Examples of adverse effects include the physical destruction of all or part of the historic property; an alteration of the property that is not consistent with the Secretary of Interior’s Standards for the Treatment of Historic Properties (36 CFR 68); the removal of the property from its historic setting; changing the character of the property’s use or of the physical features of its setting that contribute to its significance; and the introduction of visual, aural, and atmospheric elements that diminish the integrity of the property’s significant historic features.

Environmental Impacts to Cultural Resources vs. the Section 106 Scale

No Impact – Either there are no identified historic properties within the project Area of Potential Effect or the activity being analyzed has no potential to affect identified historic properties. This equates to *no effect* for Section 106.

No Significant Impact – An impact that has potential to affect an historic property but the effect can be avoided, minimized, or mitigated through various measures as per 36 CFR 800.6. This equates to *no adverse effect*, or an *adverse effect* which is resolved through mitigation under Section 106.

Significant Impact – An impact that diminishes or destroys the integrity of an NRHP property and which cannot be avoided, minimized, and or resolved through mitigation as per 36 CFR 800.7. This equates to *adverse effect* for Section 106 which cannot be mitigated or resolved.

In the practice of Section 106 consultation, adverse effects can often, but not always, be mitigated, when the loss of integrity of the NRHP resource is justified, balanced against other competing interests. Resolution of adverse effects to historic properties can be accomplished through the use of an agreement document such as a Memorandum of Agreement or Programmatic Agreement which contain mitigation or avoidance stipulations. They can also be accomplished through alternative procedures such as Program Comments. Neither the initial identification of a significant impact to cultural resources or a determination of adverse effect under Section 106 necessarily precludes a FNSI under NEPA. The loss of NRHP eligible cultural resources would have to be major in scale and importance and without any acceptable feasible mitigation measures to negate a FNSI.

4.7.2.1 Status of Cultural Resource Inventories and Section 106 Consultations

In order to comply with Section 106 of the NHPA, The Louis Berger Group, Inc. was contracted by the U.S. Army Corps of Engineers (USACE), Mobile District to conduct a cultural resources assessment of Oswald USARC. The USARC property can be characterized as a modern urban environment that has been disturbed by construction and almost completely paved. USACE archaeologists determined that due to the level of disturbance from construction and operation of the Oswald USARC the site lacked potential for intact archaeological sites. Therefore, the cultural resources assessment focused on the built environment.

Two buildings were found to be of sufficient age (over 50 years) to require architectural evaluation. These included the administrative building and the OMS, both completed in 1959. Both structures were found to lack sufficient integrity to convey their historic association with the Cold War New Look Army Reserve building program, due to the addition made to the drill hall and the replacement of original windows on the administrative building.

Section 106 Consultations – In conjunction with the NEPA process, on April 2, 2011, the 88th RSC sent a Section 106 consultation letter to the Washington SHPO. The letter included the historic building survey of Oswald USARC and the historic property inventory forms for both structures recommending Oswald USARC as not eligible for listing on the NRHP. The Army included its determination of “no historic properties affected” by the proposed disposal based on the lack of archaeological potential and the results of the architectural inventory as per 36 CFR 800.4(d)(1). After reviewing the information the Washington SHPO responded on June 1, 2011. The SHPO concurred with the Army’s determination of “no historic properties affected” by the proposed disposal of the property out of federal ownership. All correspondence is included in Appendix B.

4.7.2.2 No Action Alternative

There would be no impacts on cultural resources under the No Action Alternative. No construction would occur and no changes to the USARC would take place.

4.7.2.3 Caretaker Status Alternative

Under the Caretaker Status Alternative, no changes would occur, resulting in no impacts to cultural resources.

4.7.2.4 Traditional Disposal and Reuse – Preferred Alternative

Potential impacts to cultural resources from closure, construction, and reuse would not be significant because no historic properties have been identified or are likely to occur at the Oswald USARC.

4.8 SOCIOECONOMICS

Socioeconomic analysis considers factors affecting the quality of life and financial wellbeing of the surrounding community where residents live, work, shop, and play. These factors include employment, income, housing, and public services such as fire, police, hospitals, schools, and parks. The ROI is Snohomish County, Washington. In addition to national, state, and county data, the Census Tract for the project location has been included for comparison. A Census Tract is a small, relatively permanent statistical subdivision of a county and provides census information for a geographic area smaller than the ROI. The Census Tract has been included in this analysis to compare the characteristics of the direct project area with the ROI, state, and nation.

The Affected Environment and Environmental Consequences sections of the socioeconomics resource area of this EA are presented in limited detail. This is due to the fact that none of the personnel relocating from the proposed USARC would be permanently moving out of the ROI.

4.8.1 Affected Environment

4.8.1.1 Economics

Table 4-5 compares the general ethnic and economic characteristics of the local community to the state and the nation, based on the most recent U.S. Census data (U.S. Census 2011a, b, and c; BLS, 2011; BEA, 2011). According to the Census, the types of occupations for the labor force in the surrounding area include mainly manufacturing, retail trade, and state and local government. The major employers are Boeing, Everett Naval Station, and the Providence Regional Medical Center (EDC Snohomish, 2009).

Table 4-5: Socioeconomic Data for Census Tract 402, Snohomish County, Washington State, and the United States (2009)

	Census Tract 402, Snohomish County, WA	Snohomish County	Washington	United States
Population	4,616	673,709	6,465,755	301,461,533
Median household income	\$21,503	\$64,780	\$56,384	\$51,425
Persons below poverty level*	1,527** (22-44%)	54,349 (8%)	749,120 (12%)	39,537,240 (13%)
Unemployment rate	N/A ⁺	9.5%	9.3%	9.3%
White persons	3,192	526,820	4,883,158	198,415,102
Overall % minority population	31%	22%	24%	34%
Black persons	7%	2%	3%	12%
American Indian and Alaska Native	1%	1%	1%	1%
Hispanic	12%	8%	10%	15%
Asian	5%	8%	6%	4%
Hawaiian and other Pacific Islander	4%	0.5%	0.5%	0.5%
Other race	0%	0.5%	0.5%	0.5%
Two races	2%	3%	3%	1%
Source: U.S. Census 2011a, b, and c; BLS 2011; BEA 2011				

Notes: *This is persons below poverty level for whom poverty status was determined.

**Margin of Error is +/-505 for this census tract poverty estimate number.

⁺This data is not available at this geographic level.

4.8.1.2 Environmental Justice

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* directs Federal agencies to analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities.

As shown in the table above, the census tract has a higher percentage of minority populations than both the state and the county. Snohomish County's minority population (22%) is lower than the nation (34%), the state (24%), and census tract 402 (31%). However, the census tract that contains the Oswald USARC is proportional to the national minority population. The largest minority population is Hispanic, which is consistent with the national minority population figures.

Median household income in Snohomish (\$64,780) is higher than the national (\$51,425) and state (\$56,384) averages. The population living below the poverty level in the county (8%) is lower than the nation (13%) and lower than the state (12%) but higher than the census tract (22% - 44% range with margin of error).

4.8.1.3 Protection of Children

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks* directs Federal agencies to ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.

The nearest residence to the property is located adjacent to the property's western boundary. The nearest school is the Hawthorne Elementary School located east of the property. The school provides educational services for pre-school through 5th grade, with an enrollment of 527 students (Parkins, 2011). Other locations in the vicinity of the property that would likely contain proportionally high numbers of children include an apartment complex to the east of the property, a mobile home park to the west of the property and The Everett's Boys and Girls Club lies in close proximity to the southeast boundary of the property.

4.8.2 Environmental Consequences

The economic effects of implementing the Proposed Action are estimated using the Economic Impact Forecast System (EIFS) model, a computer-based economic tool that calculates multipliers to estimate the direct and indirect effects resulting from a given action. Changes in spending and employment associated with the renovation of housing represent the direct effects of the action. Based on the input data and calculated multipliers, the model estimates changes in sales volume, income, employment, and population in the ROI, accounting for the direct and indirect effects of the action.

For purposes of this analysis, a change is considered significant if it falls outside the historical range of ROI economic variation. To determine the historical range of economic variation, the EIFS model calculates a rational threshold value (RTV) profile for the ROI. This analytical process uses historical data for the ROI and calculates fluctuations in sales volume, income, employment, and population patterns. The historical extremes for the ROI become the thresholds of significance (i.e., the RTVs) for social and economic change. If the estimated effect of an action falls above the positive RTV or below the negative RTV, the effect is considered to be significant. Appendix C discusses this methodology in more detail.

4.8.2.1 No Action Alternative

This alternative would not impact socioeconomic conditions. Children would continue to be restricted from accessing the property.

4.8.2.2 Caretaker Status Alternative

This alternative would have a minor, temporary, adverse socioeconomic impact because the property would not be used for a social or economic purpose. Children would be protected because access to the site would be restricted.

4.8.2.3 Traditional Disposal and Reuse - Preferred Alternative

4.8.2.3.1 Economics

The Army's EIFS is a computer-based economic tool that estimates the direct and indirect effects resulting from a proposed action. Based on EIFS, the Oswald U.S. Army Reserve Center Reuse Plan would have a slight beneficial socioeconomic impact. The results of the EIFS analysis are in Appendix C. A description of the EIFS model is also available in Appendix C.

4.8.2.3.2 Environmental Justice

The Preferred Alternative would not have a high and disproportionate adverse health and environmental effect on minority or low-income populations because the effects of the proposed action would be beneficial impact by removing the hazardous waste sheds on the property and providing a safe haven for victims of domestic abuse as well as providing a daycare for children. Additional information about the presence of hazardous substances on or near the property; measures to protect populations from exposure; and the consequences that each alternative would have on air quality, water quality, geology and soils; and other environmental conditions may be found in the appropriate subsections of Section 4.0.

4.8.2.3.3 Protection of Children

The Preferred Alternative would not result in disproportionate environmental health risks or safety risks to children, because implementation of the Proposed Action would be protective of human health and the environment. The Preferred Alternative would provide a shelter and crisis center for victims of domestic violence and their children. All known hazardous materials present at the USARC have been identified and addressed (USACE, 2007). During Phase II, the OMS would be renovated into a daycare center. In Phase III, 20 housing units would be constructed for women and children who are leaving the shelter. All renovation and construction would comply with federal, state, and local environmental and safety requirements. Additional information about the presence of hazardous substances on or near the property,

measures to protect populations (including children) from exposure, and the consequences that each alternative would have on air quality, water quality, soils, and other environmental conditions may be found in the appropriate subsections of Section 4.0.

4.9 TRANSPORTATION

4.9.1 Affected Environment

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

4.9.1.1 Roadways and Traffic

The Oswald USARC is located in Snohomish County, Washington, in the City of Everett. The facility is located on the west side of Rainier Avenue between 11th and 12th Streets, at the northwestern corner of the intersection of 12th Street and Rainier Avenue. The facility entrance is on Rainier Avenue. Roads used to access the facility include Broadway, Walnut Street, 12th Street, 11th Street and Rainier Avenue.

Based on the Washington State Department of Transportation (WSDOT) Functional Classification Map for the Seattle/Tacoma/Everett Urbanized Area, 12th Street is an urban collector street. Proximate urban principal arterials include Broadway, approximately 0.1 mile west of the site, and Walnut Street, approximately 0.5 mile east of the site. 11th Street and Rainier Avenue are local roadways that are not identified on the WSDOT Functional Classification Map. Below is a definition and description of all roads surrounding the property.

- 12th Street is a north-south urban collector street with a 12-foot lane in each direction separated by a dashed yellow line.
- In the vicinity of 12th Street, Broadway, an urban principal arterial, is composed of two northbound travel lanes, two southbound travel lanes, and a center turn lane. The Broadway/12th Street intersection is signalized with marked pedestrian crosswalks. North of 12th Street, Broadway becomes a divided highway for a distance of approximately 800 feet, with two travel lanes in each direction.
- In the vicinity of 12th Street, Walnut Street (East Marine View Drive), an urban principal arterial, is composed of one northbound travel lane, one southbound travel lane, and a center turn lane. Walnut Street contains a planted, raised median and other traffic calming elements such as bulb-out/curb extension and chokers. According to the Snohomish County Bicycling and Trail Map

(Community Transit, 2011), this street also includes a paved bicycle/pedestrian trail. The Walnut Street/12th Street intersection has a signal and marked pedestrian crosswalks.

- Rainier Avenue, a north-south roadway that connects 12th and 11th Streets, is a two-way street that provides one travel lane in each direction. Rainier Avenue does not provide on-street parking. 11th Street is an east-west roadway that connects Rainier Avenue to 10th Street and Poplar Street. It is two-way street that contains one travel lane in each direction. A limited amount of on-street parking is provided along 11th Street.

Average Daily Traffic (ADT) volumes and hourly traffic volumes for 2010 and 2011 are available from the Snohomish County for 12th Street, Broadway, and Walnut Street that provide access to the site. The 2010 ADT volumes on 12th Street west of Poplar Street (less than 1,000 feet east of from Rainier Avenue) are 1,325 vehicles in the eastbound direction and 1,338 vehicles in the westbound direction. The 2010 ADT volumes on Broadway south of 14th Street are 3,593 vehicles in the northbound direction and 11,794 vehicles in the southbound direction. The 2011 ADT volumes on Walnut Street south of 13th Street are 5,219 vehicles in the northbound direction and 4,788 vehicles in the southbound.

The peak hour traffic volumes on 12th Street are low during the weekday peak hours based on the 2010 counts from the Snohomish County. The morning peak hour traffic volumes on 12th Street west of Poplar Street are 63 vehicles in the eastbound direction and 167 vehicles in the westbound direction. The afternoon peak hour traffic volumes are 125 vehicles in the eastbound direction and 100 vehicles in the westbound direction. The weekend peak hour traffic is 90 vehicles in the eastbound direction and 91 vehicles in the westbound direction between 1:00 PM and 2:00 PM on Saturday. The USARC generates approximately 33 trips each weekday by full-time employees and a maximum of approximately 133 trips on any given weekend by Reservists.

4.9.1.2 Site Transportation

The main entrance to the Oswald USARC site, which provides access to Oswald Hall and the POV parking area only, is off of Rainier Avenue. A secondary driveway that provides access to the OMS and MEP area is also located on Rainier Avenue, just north of the main entrance. Another secondary driveway providing access to the MEP area and OMS is available off of 12th Street, just west of Rainier Avenue. The site does not contain major roadways but includes two separate paved parking areas at its southern end, one for military equipment and one for POVs; a connection between these two parking areas does not exist. The POV parking area contains 53 marked spaces. Additional parking spaces (approximately

nine) are provided behind Oswald Hall. Approximately 90 percent of the site is covered by impervious surfaces (i.e., parking areas, internal circulation areas, building footprints).

4.9.1.3 Public Transportation

Everett is well-connected and contains an array of public transportation options, including local and regional bus providers as well as regional light rail (or commuter) rail service. Collectively, these transit services provide the public with numerous alternatives to single-occupant vehicles. The City of Everett is currently served by several bus routes operated by Everett Transit (ET). ET local bus service (including para transit bus service) is provided seven days a week including holidays. Located approximately 2 miles south of the USARC site at 3201 Smith Avenue, Everett Station serves as a transportation hub within the city and offers access to a variety of transportation options:

- ET, providing fixed bus route and para transit services within the City of Everett;
- Community Transit, connecting Everett to the remainder of the county via local and commuter bus, DART (Dial-A-Ride Transportation, a para transit service) and vanpool services;
- Sound Transit, operator of numerous express regional bus routes as well as the Sounder Commuter Rail, which provides regional commuter rail service between Everett, Seattle, and Tacoma;
- Amtrak, providing inter-city train (and national) service via its Empire Builder and Cascades line;
- Skagit Transit, providing traditional fixed route bus transportation (as well as curb-to-curb Dial-A-Ride service for those unable to use traditional bus service) in the neighboring Skagit County;
- Island Transit, a Public Transportation Benefit Area (PTBA) / public municipal corporation (per Washington State RCW 36.57A) that operates fare-free transit and rideshare services within the adjacent Island County;
- Greyhound, providing and inter-city (and national) bus service; and
- Northwestern Trailways, offering regional bus service.

In terms of transit service that is available in close proximity to the Oswald USARC, one ET bus stop is located adjacent to the site at Rainier Avenue and 12th Street. It is served by the ET 29 bus route. The next closest ET bus stop, approximately 0.2 miles southeast of the site, is located at Broadway and 13th Street and is served by ET bus routes 7 and 9. Both of these stops are typically a 15 to 20 minute bus ride from Everett Station, where access is available to numerous additional public transit services. Generally,

ET bus service is provided from 4:30 a.m. to 11:55 p.m. on weekdays, and from 6:55 a.m. to 10:55 p.m. on weekends. The frequency of service ranges from one to two trips per peak hour, depending on the bus route. For the three bus routes serving the site (7, 9, and 29), in the northbound direction the frequency of service is two trips during the morning peak hour and two trips during the afternoon peak hour. For the southbound direction, the frequency of service for the three bus routes remains the same — two trips during the morning peak hour and two trips during the afternoon peak hour. Service is also provided on weekends, but with less frequency and for a shorter duration.

4.9.2 Environmental Consequences

The following criteria have been developed to assess the transportation impacts for each of the alternatives:

No Effect – No alterations of traffic patterns and trends would result from the action.

No Significant Effect – Short- or long-term alterations of traffic patterns and trends would result from the action. The intersections may reach capacity but this change would be temporary or managed through improvements.

Significant Effect – Traffic patterns would be permanently altered from the action. The intersections would reach capacity and extensive delays would develop.

4.9.2.1 No Action Alternative

Implementing the No Action Alternative would not alter the existing transportation infrastructure at the Preferred Alternative site or in surrounding areas. Therefore, no effects would be expected.

4.9.2.2 Caretaker Status Alternative

No adverse impacts to traffic would occur under the Caretaker Status Alternative since the USARC would be closed and no renovation would occur and there would be a slight beneficial impact from the reduction in commuter and weekend trips. Traffic levels would be lower than under the No Action Alternative, due to the elimination of the daily vehicle traffic from the 9 full-time employees and vehicle traffic from the 66 reservists that currently report to the site for drills on select weekends. Maintenance activities at the property would have no effect on transportation.

4.9.2.3 Traditional Disposal and Reuse - Preferred Alternative

Overall, impacts to transportation from closure, renovation, and reuse would not be significant. Closing the site would eliminate the daily vehicle traffic from the 9 full-time employees and vehicle traffic from the 66 reservists who report to the site for drills on select weekends. The renovations of existing facilities to compliance with local or state building codes would be relatively small and construction related traffic is not expected to be significant.

It is expected that the new DVS shelter would have a staff of 16 full-time workers and would be able to accommodate 45 people at any given time, or a total of approximately 600 people per year.

Trip generation for the proposed reuse of the USARC site was conducted for the weekday based on the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 8th Edition. ITE Land Use Code 715 (Single Tenant Office Building) was used for projections for the nine existing USARC employees. For the proposed DVS, the ITE Trip Generation Manual does not provide guidelines for this type of land use. Therefore, a similar land use, ITE Land Use Code 253 (Congregate Care Facility), was used to project trips for the proposed DVS. Using the trip generation procedure outlined by the ITE, the net increase in weekday daily vehicles projected for the Preferred Alternative are summarized in Table 4-6, The Preferred Alternative would generate 91 daily vehicle trips on the weekday.

Table 4-6: Trip Generation Projection

Facility	Land Use	ITE Code	Amount	Units	Weekday Daily Trips	Weekend Daily Trips
USARC (Existing)	Single Tenant Office Building	715	9	Employees	(33)	0
		N/A	66	Reservists	0	(132)
DVS (New)	Congregate Care Facility	253	45	Beds	91	91
Net Increase:					58	(41)

Source: ITE Trip Generation Manual, 8th Edition (ITE, 2008)

ITE Trip Generation Manual does not provide weekend trip estimations for both ITE Land Use Code 715 (Single Tenant Office Building) and ITE Land Use Code 253 (Congregate Care Facility). For a conservative analysis, it is assumed that the projected DVS weekend vehicle trips would be the same as the weekday. For the USARC, the elimination of the 66 reservists associated with the existing USARC would reduce approximately 132 daily vehicle trips (one trip in and one trip out for 66 reservists). As a result, the Preferred Alternative would reduce approximately 41 daily vehicles on the weekend.

It is expected that some of the shelter's staff and temporary occupants would use public transit given the City's extensive system of transportation services, which would limit the amount of vehicular traffic generated by the proposed reuse. Weekday and weekend traffic volumes on the surrounding roadway network would not substantially increase as a result of the Preferred Alternative, nor would the corresponding levels of service be considerably diminished. Reuse of the property would therefore generate a negligible amount of additional vehicular traffic during the weekdays as a result of the increase in the number of daily employees (net increase of 7 full-time employees) and the introduction of temporary shelter occupants. Due to the small size of the property and the relatively low level of reuse intensity, it is expected that the Preferred Alternative would have no significant effect on transportation. WSDOT was contacted for concurrence on the finding of no significant effect. WSDOT stated they do not have any jurisdiction over this area and had no comments or concerns. Additionally, WSDOT contacted the City of Everett and confirmed the city does not have any issues with the project (Carruth, 2011).

4.10 HAZARDOUS AND TOXIC SUBSTANCES

This section addresses potential site contamination issues: the use, handling, and storage of hazardous and toxic substances and the generation and disposal of hazardous materials associated with the proposed operations and at the Oswald USARC facility. Hazardous materials are substances that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may present a substantial danger to public health or the environment if released. These typically include reactive materials such as explosives, ignitables, toxics (such as pesticides), and corrosives (such as battery acid). When improperly stored, transported, or otherwise managed, hazardous materials can significantly affect human health and safety and the environment.

4.10.1 Affected Environment

4.10.1.1 Hazardous Materials Use

Hazardous materials used and stored at the Oswald USARC are associated with facility maintenance, vehicle maintenance, and janitorial activities. These hazardous materials stored at the Oswald USARC are contained in two portable hazmat storage sheds, hazmat storage structure, and within the OMS building (USACE, 2007).

4.10.1.2 Hazardous Waste Storage and Handling Areas

The Oswald USARC is listed under the U.S. EPA's Resource Conservation and Recovery Information System (RCRIS) as a Resource Conservation and Recovery Act – Conditionally Exempt Small Quantity Generators, (RCRA-CESQG), EPA ID# WAH000011148. A RCRA-CESQG is defined as a site that generates less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. The site is listed as RCRA-CESQG based on the generation of waste from vehicle maintenance at the OMS. Typical wastes at the Oswald USARC include used oily rags, used oil and oil filters, paint cans, used antifreeze, and other vehicle maintenance waste. Chemicals stored at the OMS include: 5-gallon containers of diesel fuel, motor oil, brake fluid, gear oil, lubrication oil, multi-purpose grease, aerosol spray paints, as well as other typical vehicle maintenance fluids. Used oil and antifreeze are removed by an off-site contractor on an as-needed basis and the solvent sink is serviced by Safety Kleen on a monthly basis (USACE, 2007).

4.10.1.3 Environmental Condition of Property

An ECP Report was completed for the Oswald USACE property in 2007. The purpose of the report was to obtain a baseline of the environmental condition of the property and provide recommendations for future studies. In accordance with DoD policy defining the classifications, the ECP found the property to fall under Category 2. Category 2 includes an area or parcel of real property where only the release or disposal of petroleum products or their derivatives had occurred. This release was a result of the petroleum contamination of soils from two former heating oil USTs that were remediated after the removal of the tanks in 1993. Contaminated soils were transported to an off-site treatment and disposal facility. No additional action was required by the WSDOE (USACE, 2007). There are no land use controls required to address environmental contamination and the property is suitable for residential use. Results of the findings are summarized below.

Asbestos. A 1994 Asbestos Survey indicated that an asbestos abatement project had been performed at the site in 1986 and 1987 (AGI Technologies, 1994). While no abatement records were found documenting the locations and quantities of Asbestos Containing Materials (ACM) removed, the inspection found that previous thermal pipe insulation had been removed and replaced with fiberglass insulation.

Oswald Hall contains known or suspected ACM including brown, black, and light brown floor tile. Other materials assumed to be ACM included wall materials and insulated metal doors. All ACM materials

were in good overall material condition. In addition, the roof of the administration building was not sampled and could contain asbestos (USACE, 2007).

Lead-Based Paint. According to information provided by the 70th Regional Readiness Command (RRC), there are no documented lead-based paint (LBP) surveys or abatement projects at the site. Based on the reported date of construction (1959), it is likely that LBP exists in the structures. During the 2006 site visit for the ECP, painted surfaces within the administration building and OMS appeared to be in good condition (USACE, 2007). The site visit for this EA on February 9, 2011, found the paint to be in good condition with no flaking or peeling.

Munitions and Explosives of Concern (MEC). The Oswald USARC has a small locked arms vault located in the administration building. The vault is only accessible by authorized personnel. Based on discussions with site personnel, only small quantities of small arms ammunition were stored in the arms vault. Personnel also indicated that no MECs, including unexploded ordnance (UXO), have been stored or disposed of on the site.

Oil/Water Separator. Two oil/water separators (OWSs) are located at the Oswald USARC. Water collected in the OWSs is discharged to the City of Everett sanitary sewer system. They are inspected and serviced by an outside contractor when needed, which is approximately once per year (USACE, 2007).

The hazmat storage structure was designated with a sloped flooring system leading to a sump devised to collect runoff from spills within the area of the structure. The sump is situated at the center of the structure and extends to approximately 3 feet in depth. According to facility personnel, there have been no spills within the area of the hazmat storage structure that required the sump to be pumped or cleaned (USACE, 2007).

A grease trap associated with the kitchen is situated on the southwestern exterior of Oswald Hall. The grease trap is serviced by an outside contractor on an as-needed basis (USACE, 2007).

Polychlorinated Biphenyl (PCB) Equipment. Based on information contained in a previous PCB-Containing Equipment Inventory Report and observations during the August 2006 site reconnaissance, two non-PCB transformers are located at the site. According to the aforementioned report, a major renovation was conducted at the Site in 1998 which included upgrades to the lighting system in the drill hall, kitchen, and OMS building. Additional lighting systems were renovated in August 2004 and the Final PCB Containing Equipment Inventory Summary Report concluded there “appears to be no remaining PCB-containing equipment at the Oswald USARC (USACE, 2007).

PCB Transformers. Two Snohomish Public Utility District owned electrical transformers, one pad-mounted and one pole mounted were observed on the southeastern portion of the Site. No labels, stickers or indication of the presence or non-presence of PCBs was observed on these transformers during the site visit. These transformers are owned and maintained by Snohomish Public Utility District. Any issue relating to these units would be the responsibility of Snohomish Public Utility District. A visual inspection of the transformers during the 2006 site visit revealed no evidence of leaks or spills and the transformers appeared to be operational and in good condition (USACE, 2007).

Radiological Materials. Examples of Army radioactive commodities include lensatic compasses, depleted uranium munitions, radio-luminescent sights and gauges on tanks and mortar muzzles, radium gauges on tanks and vehicles, and moisture density gauges. Army radioactive commodities are rugged, with a limited amount of the radionuclide in a non-dispersible form. Army radioactive commodities are not expected to have contaminated areas, furniture, or equipment where they were present.

USTs. The Oswald USARC currently has no USTs on the property. Site records indicate that two heating oil USTs were removed in 1993. A third UST was depicted on a figure on the UST removal documentation, however, a hand written comment “no tank” points to that area. A 1989 record provided by the 70th RRC indicated that this third UST was installed originally for gasoline storage, and was later used for waste solvent. The 1989 document stated that the tank was scheduled for removal in 1989. No removal documentation concerning a third UST has been located as of the date of this report and it is unknown if this UST was removed or abandoned in place (USACE, 2007). In November 2011, a UST locator service was brought on-site to determine the presence or absence of a third UST. The locator service confirmed that there is no third UST (Skeldon, 2011).

Waste Disposal Sites. Based on an interview with the Unit Administrator for the site, a landfill may have been on or in the vicinity of the site prior to its development in the late 1950s. However, no information was found to confirm the previous use, and a representative from the local building department indicated that there are no current or historic designated landfill areas within the vicinity of the site (USACE, 2007).

4.10.2 Environmental Consequences

For the purposes of assessing the significance of impacts related to hazardous and toxic substances, the following impact thresholds were developed:

No Effect – There would be no increase in the amount of hazardous materials or waste handled, stored, used, or disposed of.

No Significant Effect – Action would result in a change in the amount of materials or waste to be handled, stored, used, or disposed; but all hazardous or toxic materials and/or wastes could be safely and adequately managed in accordance with all applicable regulations and policies, with limited exposures or risks. Required actions to remediate environmental releases and to remove or encapsulate friable asbestos and lead-based paint hazard are complete or would be completed by the transferee; the property is suitable for the use intended by the transferee; and intended use of the property is consistent with the protection of human health and the environment.

Significant Effect – Action would result in a substantial change in the amount of materials or waste to be handled, stored, used, or disposed of, and this could not be safely or adequately handled or managed by the proposed staffing, resulting in unacceptable risk, exceedance of available waste disposal capacity, or probable regulatory violation. Site contamination conditions would preclude development of the site for the proposed use.

4.10.2.1 No Action Alternative

No impacts would be expected. Implementation of the No Action Alternative would not alter the hazardous and toxic substances at Oswald USARC.

4.10.2.2 Caretaker Status Alternative

No impacts would be expected. Implementation of the Caretaker Status Alternative would require closure of the facility and result in reduced demand for both hazardous materials and hazardous wastes management compared to those used by existing vehicle maintenance and janitorial activities.

4.10.2.3 Traditional Disposal and Reuse - Preferred Alternative

Asbestos. Prior to transfer a site-specific update of the ACM inventory would be performed to identify friable ACM. All friable ACM that poses an unacceptable risk to human health would be removed or encapsulated or the transferee would agree to remove or encapsulate the friable ACM and to comply with all federal, state, and local requirements for ACM. No significant impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

Lead-Based Paint. If this alternative was selected, the deed would contain a lead-based paint provision in which the grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or

structures on the Property as Residential Property, as defined under 24 CFR 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. Because of this, no significant impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

Munitions and Explosives of Concern. Based on a review of existing records and available information, there is no evidence that MEC are present on the property. Thus, no impacts to the health and safety of anyone using the facility, including children, low income and minority populations, would occur.

Oil/Water Separator. The OWS discharges to the City of Everett sanitary sewer system and there is no evidence of a release. Therefore, no significant impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

PCB Equipment. Based on the Final PCB Containing Equipment Inventory Summary Report, there are no remaining PCB-containing equipment on the property. Because of this, no impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

PCB Transformers. There are two Snohomish Public Utility District-owned transformers located on the southeastern portion of the property. A visual inspection of the transformers during the 2006 site visit revealed no evidence of leaks or spills. No impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

Radiological Materials. Prior to transfer the Army will conduct a radiological Historic Site Assessment to identify areas where Nuclear Regulatory Commission (NRC)-licensed or radium-containing materials were present and will take all actions required by the NRC to release these areas for unrestricted use. Thus, no impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

USTs. All three USTs have been removed. The release of petroleum products from the 2,000 gallon heating oil tank located adjacent to the administration boiler room was remediated as part of the UST closure. All remedial actions are complete and there are no land-use restrictions on the property. Therefore, no impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

Waste Disposal Sites. Based on an interview with a representative from the local building department, there is no current or historical designated landfill area within the vicinity of the site. Because of this, no

impacts to the health and safety of anyone using the facility, including children or low income and minority populations, would occur.

Overall, potential impacts to hazardous and toxic substances from the traditional disposal and reuse of the Oswald USARC would be expected to have no significant effect. Implementation of the Preferred Alternative would involve minimal construction during the initial phase. Due to the known or suspected ACM materials, and since LBP likely exists in the structures, abatement projects of known areas would be required before the conversion and reuse of the property. Before the property could be released for unrestricted use, a radiological survey would also be required. Removal and disposal would be in accordance with applicable federal and state regulations and no significant impacts are expected. Therefore, there would be no impact to hazardous materials or hazardous waste management associated with construction activities.

Reuse of the Oswald USARC facilities following the LRA reuse plan would have a beneficial impact to hazardous materials and hazardous wastes management. Reuse of the facilities would necessarily require closure of the USARC and result in reduced demand for both hazardous materials and hazardous wastes management compared to those used by existing facility maintenance, vehicle maintenance, or janitorial activities.

4.11 CUMULATIVE EFFECTS SUMMARY

A cumulative impact is defined as “the impacts on the environment that result from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertake such other actions” (40 CFR 1508.7). The section goes on to note: “such impacts can result from individually minor but collectively significant actions taking place over a period of time.” Cumulative impacts associated with implementation of the Proposed Action would include any impacts from other on-going actions that would be incremental to the impacts of the proposed action alternatives.

Other past, present or future projects that are considered for their cumulative impacts include

- Completion of recreation center at Everett Community College (Main Campus) (Past)
- Construction of Community Health Center (Present)
- Completion of hospital tower at Providence Regional Medical Center (Present)
- Expansion of Everett Community College (Future)
- Redevelopment of WWII Housing by the Everett Housing Authority (Future)

- Mixed-Use redevelopment along the Broadway Corridor (Future)

4.11.1 No Action Alternative

Implementation of the No Action Alternative would avoid new impacts that could interact with the impacts of other projects in the vicinity of the Oswald USARC. Therefore, there would be no cumulative impacts associated with the No Action Alternative.

4.11.2 Caretaker Status Alternative

Implementation of the Caretaker Status Alternative would avoid new impacts that could interact with the impacts of other projects in the vicinity of the Oswald USARC. Therefore, there would be no cumulative impacts associated with the Caretaker Status Alternative.

4.11.3 Traditional Disposal and Reuse - Preferred Alternative

Land Use

The Preferred Alternative is consistent with the current zoning and the residential and retail uses adjacent to the site. The reuse of the adjacent property by Everett Community College would not result in significant cumulative impacts to land use.

Aesthetic and Visual Resources

The Preferred Alternative would continue to be consistent with the aesthetic quality of the surrounding area. None of the cumulative projects are expected to interfere with existing viewsheds. As a result, these projects would not adversely cause significant impacts when added cumulatively to the effects of other construction.

Air Quality

Cumulative impacts to air quality would occur from additional construction projects occurring concurrent with the construction period of the Preferred Alternative. Future projects likely to overlap include the expansion of the Everett Community College, redevelopment of the Broadway corridor and redevelopment of the WWII housing. Given the minimal emissions expected from the Preferred Alternative, it is not expected that cumulative emissions from other construction projects would exceed *de minimis* thresholds and change the attainment status of the county; therefore cumulative effects are expected to be not significant.

Geology and Soils

Impacts to geology and soils are site-specific and are not affected by cumulative development in the region. Cumulative impacts would only occur if development were to occur within or immediately adjacent to the site where the proposed action is proposed, or if development on the site affected geologic resources of the site where other development may occur. Because there are no current or proposed future actions scheduled to occur within the USARC property, there would be no significant cumulative impacts to the geology or soils within or immediately adjacent to the project area.

Cultural Resources

There are no cumulative impacts for cultural resources. The Area of Potential Effect of the Preferred Alternative would be limited to the site and its immediate vicinity. As there is low potential for cultural resources within the site, there is no potential for a cumulative impact.

Socioeconomics

The expansion of the Everett Community College as well as the Broadway redevelopment would be expected to have positive effects on the quality of life for Everett.

All other cumulative projects would be expected to have a positive effect on economic development due to increased construction spending over current proposed levels. Increased construction spending would contribute to raised incomes, higher sales volume, and increased employment. Whether or not these effects will be significant depends on whether or not this spending will contribute to percentage increases in these categories above historical RTV values. The Preferred Alternative would not affect the planned future development.

Transportation

The background projects proposed in the vicinity of the study area were evaluated as they pertain to traffic cumulative impacts. In view of the size of some projects, distance from the project sites of others, uncertainty of many project details (they are still in the early planning stages), and since significant transportation impacts have not been identified for the Preferred Alternative, there are not expected to be any significant cumulative impacts to transportation.

Hazardous and Toxic Substances

The quantities of hazardous substances present on the USARC property are not significant. These hazardous substances would be managed, used, and disposed of in accordance with federal, state, and local requirements. Consequently, a release of hazardous substances into the environment that would have a significant cumulative impact on adjacent properties would be unlikely.

4.12 MITIGATION SUMMARY

None of the predicted effects of the Proposed Action would result in significant impacts; therefore, mitigation is not needed. Because the new construction would not disturb more than one acre, a NPDES permit is not required. To complete Phase III, the Everett City Council would need to amend the Consolidated Housing Plan. A construction permit from the City of Everett would be required for all three phases.

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5.0 FINDINGS AND CONCLUSIONS

5.1 FINDINGS

5.1.1 Consequences of the No Action Alternative

Under the No Action Alternative, the proposed reuse would not take place and no environmental impacts would occur.

5.1.2 Consequences of the Caretaker Status Alternative

Under the Caretaker Status Alternative, the Army would retain the USARC as-is with on-going maintenance; therefore no environmental impacts would occur.

5.1.3 Consequences of the Traditional Disposal and Reuse – Preferred Alternative

The Preferred Alternative would not have any significant adverse effects on any of the environmental or related resource areas at the Oswald USARC facility or to areas surrounding the USARC. All of the resource areas were evaluated to be at the no effects or no significant effect levels.

A summary of impacts by resource area for the No Action and Actions Alternatives is provided in Table 5-1.

Table 5-1: Summary of the Impacts of the Alternatives

Resource	No Action Alternative	Caretaker Status Alternative	Preferred Alternative
Land Use			
<i>Regional Geographic Setting and Location</i>	No effect.	No effect.	No effect.
<i>Site Land Use</i>	No effect.	No effect.	No significant effect.
<i>Surrounding Land Use</i>	No effect.	No effect.	No effect.
<i>Coastal Barriers and Zones</i>	No effect	No effect	No significant effect
<i>Current and Future Development in the Region of Influence</i>	No effect.	No effect.	No effect.
Aesthetic and Visual Resources	No effect.	No effect.	No significant effect.
Air Quality	No effect.	No effect.	No significant effect.
Geology and Soils			
<i>Geologic and Topographic Conditions</i>	No effect.	No effect.	No significant effect.

Resource	No Action Alternative	Caretaker Status Alternative	Preferred Alternative
<i>Soils</i>	No effect.	No effect.	No significant effect.
Cultural Resources			
<i>Prehistoric and Historic Background</i>	No effect.	No effect.	No effect.
<i>Status of Cultural Resource Inventories and Section 106</i>	No effect.	No effect.	No significant effect.
<i>Native American Resources</i>	No effect.	No effect.	No significant effect.
Socioeconomics			
<i>Economics</i>	No effect.	No effect.	No significant effect.
<i>Environmental Justice</i>	No effect.	No effect.	No significant effect.
<i>Protection of Children</i>	No effect.	No effect.	No significant effect.
Transportation			
<i>Roadways and Traffic</i>	No effect.	No effect.	No significant effect.
<i>Site Transportation</i>	No effect.	No effect.	No significant effect.
<i>Public Transportation</i>	No effect.	No effect.	No significant effect.
Hazardous and Toxic Substances			
<i>Uses of Hazardous Materials</i>	No effect.	No effect.	No significant effect.
<i>Storage and Handling Areas</i>	No effect.	No effect.	No significant effect.
<i>Environmental Condition of Property</i>	No effect.	No effect.	No significant effect.
Cumulative Effects	No effect.	No effect.	No significant effect

5.2 CONCLUSIONS

Based on the analysis performed in this EA, implementation of the Preferred Alternative would have no significant direct, indirect, or cumulative effects on the quality of the natural or human environment. Preparation of an Environmental Impact Statement is not required and issuance of a FNSI would be appropriate.

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Rebecca Byron, AICP	Environmental Planner	MURP Urban and Regional Planning, B.S. Environmental Science and Policy. Project Manager. Responsible for all sections prepared by Louis Berger staff.	6 years
Chris Dixon	Environmental Planner	MBA, M.A. Urban and Regional Planning, B.S. Environmental Economics and Management Responsible for Aesthetic and Visual Resources and Socioeconomics	1 year
Sarah Groesbeck	Architectural Historian	M.A. Historic Preservation Responsible for Cultural Resources.	2 years
Stacey Barron	Principle Planner	M.A. Geography Responsible for Transportation.	13 years
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This section identifies local, state and federal agencies that have received a copy of the EA and FNSI or a letter indicating that they are available for review.

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9.0 ACRONYMS

ACM	Asbestos Containing Materials
ACS	American Community Survey
ADT	average daily traffic
APE	Area of Potential Effect
BRAC	Base Realignment and Closure
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CMP	Coastal Management Program
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CZMA	Coastal Zone Management Act
DART	Dial-A-Ride Transportation
DoD	Department of Defense
DVS	Domestic Violence Services
EA	Environmental Assessment
ECC	Everett Community College
ECP	Environmental Condition of Property
EIFS	Economic Impact Forecast System
EO	Executive Order
ET	Everett Transit
FEMA	Federal Emergency Management Agency
FNSI	Finding of No Significant Impact
hazmat	hazardous materials
HVAC	Heating, Ventilation, and Air Conditioning
LBP	Lead Based Paint

LRA	Local Redevelopment Authority
MEC	Munitions and Explosives of Concern
MEP	Military Equipment Parking
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOI	Notice of Interest
NO ₂	Nitrogen Dioxide
NRC	Nuclear Regulatory Commission
NRHP	National Register of Historic Places
OMS	Organizational Maintenance Shop
OWS	Oil Water Separator
PCB	polychlorinated biphenyl
Pb	Lead
PIF	Partners in Flight
PL	Public Law
PM _{2.5}	Particulate Matter (2.5 microns or less)
PM ₁₀	Particulate Matter (10 microns or less)
POL	Petroleum, Oil, and Lubricant
POV	Privately Owned Vehicle
PTBA	Public Transportation Benefit Area
RCRA	Resource Conservation and Recovery Act
RCRA-CESQG	Resource Conservation and Recovery Act – Conditionally Exempt Small Quantity Generators
RCRIS	Resource Conservation and Recovery Information System
ROI	Region of Influence
RONA	Record of Non-Applicability

RRC	Regional Readiness Commands
RSC	Regional Support Command
RTV	Rational Threshold Value
SF	Square Feet
SHPO	State Historic Preservation Officer
SO ₂	Sulfur Dioxide
TPY	Tons per year
TSCA	Toxic Substances Control Act
USACE	U.S. Army Corps of Engineers
USAR	U.S. Army Reserve
USARC	U.S. Army Reserve Center
USC	United States Code
U.S. EPA	Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
UXO	Un-Exploded Ordnance
VOC	Volatile Organic Compound
WDFW	Washington Department of Fish and Wildlife
WSDOE	Washington State Department of Ecology
WSDOT	Washington State Department of Transportation
WWII	World War II

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**APPENDIX A – OSWALD U.S. ARMY RESERVE CENTER
RE-USE PLAN**

**Oswald U.S. Army Reserve Center
Re-Use Plan
June 1, 2009**



A. Description of Action

1. Closure of Oswald U.S. Army Reserve Center

As part of the 2005 round of the Base Realignment and Closure (BRAC) process, the Oswald Army Reserve Center, located at 1110 Rainier Avenue in Everett, Washington was selected for closure by the Department of Defense. The BRAC Report Army Recommendation stated "Close the Oswald U.S. Army Reserve Center, Everett, WA and relocate units to a new Armed Forces Reserve Center in the Everett, WA area if the Army is able to acquire suitable land for construction of the new facility. The new AFRC shall have the capability to accommodate units from the following Washington Army Reserve National Guard (ARNG) facilities: Washington ARNG Everett Readiness Center and the Snohomish Readiness Center, if the state decides to relocate those units."

The Department of Defense declared the Oswald Army Reserve Center to be surplus in the Federal Register published on May 9, 2007 as prescribed under BRAC. The number of affected U.S. Army Reserve personnel at the Oswald Army Reserve Center include six (6) full-time personnel (five (5) Active Guard and Reserve (AGR) and one (1) civilian). The Department of Defense plans to construct a new and larger center in Marysville, WA adjacent to the Smokey Point Naval Support Center. The current schedule for the relocation of personnel from Everett to Marysville, according to the BRAC 2005 Base Transition Coordinator, is mid-July to mid-September, 2011. The Oswald Army Reserve Center will be conveyed to another user upon construction of the new reserve center and the relocation of personnel at the subject site.

2. Re-Use Plan

BRAC requires that any military property declared to be surplus be the subject of a locally managed re-use planning process. The Department of Defense encourages the local government agency responsible for land use planning to assume this responsibility by asking the Office of Economic Adjustment (OEA) to recognize the agency as the Local Redevelopment Authority (LRA). The LRA is responsible for coordinating the property's conversion from a military to a non-military use and developing a re-use plan for the site. The re-use plan must appropriately balance the community's expressed needs for economic redevelopment and other development with the expressed needs of the homeless population in the vicinity of the installation. Specifically, the LRA must conduct outreach to homeless service providers and seek "Notices of Interest" (NOI's) from all interested parties including representatives of the homeless who plan to submit proposals for the re-use of the property. The recommended re-use plan by the LRA is not binding upon the Department of Defense (DOD). However, DOD is statutorily obligated to give the LRA's re-use plan considerable weight in making its disposal determinations.

B. Federal Planning Requirements

1. Local Redevelopment Authority (LRA)

Federal statutes governing the BRAC property surplus process encourage local governments to lead the base re-use planning process. The Everett City Council reviewed the prospect of assuming the lead role, and on February 20, 2008 adopted a resolution asking OEA to recognize the City of Everett as the LRA. On May 16, 2008 OEA published recognition of the City as the LRA in the Federal Register. This recognition formally started the re-use planning process. The LRA is responsible for carrying out most of the functions of re-use planning and following federal processes in developing a recommended re-use plan, including:

- Informing homeless and public interest groups about the closure/realignment and property disposal process and seeking Notices of Interest for the proposed re-use of the property.
- Allowing groups to tour the buildings and properties available.
- Explaining the LRA's process and the schedule for receiving NOI's.
- Discussing any known land-use or environmental constraints affecting the available property and buildings.

2. Homeless Needs

The Base Closure Community Redevelopment and Homeless Assistance Act of 1994 (The Redevelopment Act) requires that LRA's consider and provide for the needs of homeless in the community in planning for the re-use of surplus federal properties. The LRA must consider the needs of the homeless as identified in the community's Consolidated Plan Continuum of Care and other planning policies addressing the needs of the homeless. Homeless service providers are eligible for a no-cost conveyance of surplus federal property. The LRA is required to notify homeless service providers of the availability of surplus property so they can submit a notice of interest in the property.

Homeless Assistance Providers may include State or Local government agencies or private nonprofit organizations that provide or propose to provide assistance to homeless persons and families, including emergency shelter, transitional housing, permanent housing, job and skills training, employment programs, food and clothing banks, health care and treatment facilities or other programs that clearly meet the identified needs of the homeless and fill a gap in the City's Continuum of Care. Target populations which have priority for homeless assistance programs in the re-use planning process include homeless families, young children, homeless veterans, homeless adults with mental illness, runaway youth, homeless adults with additions and victims of domestic violence.

3. Public Benefit Use

Surplus federal properties may be used for a variety of uses. In addition to meeting homeless needs in the community, the property could be used for a public benefit use, such as a park, library, fire station, school, or other use that provides the community with facilities or services that benefit the public. While the City of Everett was consulted during the surplus process about any interest in the site for a City-sponsored public use, it declined pursuing the property for municipal purposes.

C. LRA Review Process

1. Notice of Availability (NOA) / Notice of Interest (NOI)

After being recognized as the LRA, the City is required to publish a Notice of Availability of surplus federal property, and notify any homeless service organizations and others it is aware of that may be interested in obtaining and using the property. The City published the NOA on May 16, 2008 for a 90-day period in which interested parties could submit a Notice of Interest, which must include a description of the organization's intended use for the surplus property. The LRA must then review all NOI's and conduct a process to develop a re-use plan for the property.

2. LRA Board

The BRAC procedures require that the LRA be governed by a board who will take final action to recommend a re-use plan for the property. Everett has decided its LRA board would consist of the Mayor and City Council as an eight-member LRA board. The LRA board decided it would use the Planning Commission as a citizen review panel to review and recommend a re-use plan for the Oswald ARC property.

3. Planning Commission

The Everett Planning Commission, under the City of Everett Charter, reviews plans and policies and makes recommendations to the City Council. The Planning Commission held two separate public workshops on the LRA re-use planning process and on the NOI that was recommended by a separate citizen's committee and City staff for the re-use plan. It held a public hearing on June 16, 2009 and adopted a resolution recommending that the LRA Board approve the re-use plan recommended by City staff.

4. Mayor's Office / Planning Department

The Planning Department provides staff support to the Planning Commission, and conducts a variety of planning processes required for updating of City plans, policies and related regulations. The Planning Department reports to the Mayor, who is the elected administrative head of the City. The Mayor's office was involved in depth in the LRA planning process.

5. Citizen Committee

The Mayor directed staff to use an ad-hoc citizen committee to review the NOI's submitted in response to the NOA. This committee consisted of 6 citizens representing a cross section on interests in the community. The committee met three times and made a recommendation on the re-use plan, with direction to staff to review other potential uses of the site as a contingency in the event that part of the plan, which is dependent on a subsequent action by the City Council under a separate planning process, is not consistent with the future action taken by Council.

D. Notices of Interest

1. **Domestic Violence Services of Snohomish County (DVS):** Submitted a proposal to remodel the existing buildings on the Oswald site for a) emergency shelter for victims of domestic violence; b) administrative offices for staff that provide support of the victims of domestic violence; and c) daycare for children of residents of the emergency shelter.

2. **Everett Community College (ECC):** Submitted a proposal to use the existing property and buildings for public safety training programs for law enforcement and fire/medic emergency services as an expanded component of existing educational programs at the nearby ECC campus.

3. **Archdiocesan Housing Authority of Seattle/Catholic Community Services:** Submitted a proposal to partner with a non-profit homeless service provider (who would use the north half of the property) and develop permanent housing for homeless veterans on the south half of the property. Shortly after submitting its NOI, the Archdiocesan Housing Authority of Seattle/Catholic Community Services withdrew its NOI.

The citizens committee heard presentations from both ECC and DVS explaining in greater detail each organization's proposal for re-use of the site. During the course of consideration by the citizens committee, ECC withdrew its NOI, leaving only the DVS proposal for the use of the Oswald ARC property.

E. Domestic Violence Services of Snohomish County Notice of Interest (NOI)

The following information has been provided by DVS concerning their proposed re-use of the Oswald ARC property.

1. Overview of Project

Domestic Violence Services of Snohomish County (DVS) proposes to re-use the existing structures at the Oswald Reserve Center to shelter victims of domestic violence and their children and to provide a service center for 24-hour crisis line, support group and advocacy services. Re-use of the Oswald Center will allow DVS to expand their shelter capacity from fifteen (15) beds to sixty (60) beds, expand staffing from twenty-five (25) to forty-one (41), thereby enabling them to provide housing and support services to 600 victims of domestic violence annually. The current annual number of victims receiving housing and support services is 217.

The Oswald Army Reserve Center is ideally located near services helpful to domestic violence clients such as Everett Community College, the Department of Social and Health Services, the Volunteers of America, and most importantly, the Snohomish County Courthouse for legal advocacy.

2. Proposed Re-use of the Oswald U.S. Army Reserve Center: Structural Renovations and Improvements

Upon learning of the Oswald surplus designation, DVS agency staff and board members toured the facility and were impressed by the excellent condition of the structures which have been well maintained since there were constructed in the early 1960's. In support of their proposed re-use of the property, DVS in their NOI, stated "Taxpayers have paid for these buildings and recycling them to meet the needs of low-income homeless people in crisis is an appropriate re-use of these structures."

Analysis of space needs conducted by the agency concluded that approximately 9,000 square feet is needed for the expanded shelter and about 5,000 square feet for the service center facility. Also, the square footage of the facility is adequate to meet expanded needs of DVS clients for both the larger shelter and the support facility. The proposed re-use of the Oswald structures is as follows:

• Main Administrative Building: Phase I, Administrative Offices

This one-story structure is the main Oswald training and administrative building, and consists of approximately 7,500 square feet. This structure would be remodeled to house the agency's non-shelter services, including group meeting rooms, a flexible multi-purpose room, separate rooms for staff to interview and counsel domestic violence victims, and staff offices. The building will also house shelter support functions such as laundry facilities, storage and a computer server room. Relatively minor modifications will be made to some spaces with removal of existing walls and the addition of others. Window enlargements will be necessary to meet fire code requirements.

▪ Attached Gymnasium and Kitchen: Phase I, Emergency Shelter

Attached to the main administrative building is a gymnasium and complete commercial kitchen, with approximately 4,150 square feet. This structure would be re-used for a 60-bed domestic violence shelter. To have adequate space for the shelter, a second floor would be added to the gymnasium. The roof will not have to be raised to accomplish this remodel. Along with the kitchen facilities, the first floor will act as the shelter "living room" for children's play area, TV viewing, eating space, group activities, and sleeping rooms for mobility impaired clients. The second floor addition will consist of 12 sleeping rooms with 2 sets of bunk beds in each room (48 total beds). Each sleeping room will have its own toilet and sink with shared tub/shower. If allowed by city regulation, small additions would be made to the gymnasium footprint adding about 2,000 square feet for 4 additional handicapped sleeping rooms and shelter staff offices. Another alternative would be to construct a new shelter structure to the north or south of the gymnasium, but again this is dependent on city regulations, including the City's Consolidated Plan, permitting such construction.

- **Vehicle Maintenance Facility: Phase II, Day Care Center**

This facility consists of approximately 2,500 square feet. DVS proposes to remodel this structure for use as a child care facility, in Phase II of the renovation plan. In the short term, the facility will be used for storage.

3. Transitional Housing: Phase III, 20 New Housing Units

If the Everett City Council amends the Consolidated Housing Plan to allow new construction of publicly subsidized housing on the Oswald Center property, DVS is proposing that the southern portion of the site be developed at a later date with 20 units of transitional housing units to serve women and children who are leaving the shelter.

The City of Everett has suggested that 30 units of housing might be appropriate for the one and a half acre site at the south end of the Oswald property to take advantage of the Multiple-family zoning. DVS believes that a 20-unit transitional facility best serves the needs of the agency and their clients. The operational model of the transitional housing facility includes the provision of project based vouchers by the Everett Housing Authority (EHA). Vouchers will provide an income stream for the project assuring project feasibility. If all the units are not occupied by DVS clients, inadequate income will be produced jeopardizing needed cash flow. The transitional housing would be constructed 36 months after DVS takes possession of the property (May – September, 2011). It is anticipated that the remodel of the administrative support center and the shelter will take 12 months to complete after the property is transferred to DVS. It will then take an additional year to begin filling the shelter and building the agency's capacity to achieve full occupancy. Transitional housing will be ready for occupancy around September, 2014.

DVS and EHA are aware of the recent efforts by the City to rezone the Broadway Corridor, and to upgrade the appearance and quality of this area of Everett. All design standards, including multiple-family development standards and other requirements of the Broadway Mixed-use zone (BMU) will be observed in remodeling and construction of the DVS campus.

4. Ownership, Management, Financing

The Everett Housing Authority and DVS will work cooperatively to acquire funding for the transitional housing. EHA will be the lead agency since they will own the facility. EHA has a great deal of experience in aggregating funding sources to construct housing facilities. EHA also has considerable experience in managing housing construction and will oversee the development of the transitional housing.

The array of sources typically used to construct transitional housing will be utilized including Community Development Block Grants, Washington State Housing Trust Funds, and Low Income Housing Tax Credits. EHA plans to project base vouchers at the facility providing a market rate funding stream. This source of project income can support bank financing with a mortgage on the property as a likely part of the funding scheme. Since construction of the transitional housing is approximately 5 years away, there is more than adequate time to plan and obtain the funding necessary for construction.

The Executive Director of the Everett Housing Authority, in a letter addressed to DVS dated March 2, 2009 indicated that the Housing Authority fully supports your plans for

provision of a new shelter together with administrative and supportive services for victims of domestic violence. “We further support the inclusion in your plans of a small transitional housing development at the 12th Street end of the property.

“Our Board of Commissioners has formally agreed to serve as the lessee and developer of the transitional units. Our expectation is that the site would be leased to EHA (or to an entity controlled by EHA) and we would develop, own and manage the units. It would be our expectation to “project-base” vouchers at the site, utilizing the allocation already awarded to DVS as part of the Sound Families program, and supplementing them with adequate additional vouchers to cover all of the units. Using this approach will serve two important purposes: first, it would make the units affordable to the tenants, all of whom will be referred by DVS from the shelter; second, it would provide a secure source of rental income, using market rental rates, in order to satisfy a lender.

“Since the site will not be vacated by the Army for three years, it is not possible to secure commitments at this time. The current weakened state of the credit market together with the focus of normal housing funders on “shovel ready” projects contribute to this situation. However, the transitional housing element of the proposal is modest in size and should not present any significant obstacles to completion. The generous lead time available should be of great assistance in putting the development and financing package together.

“We are excited about your progress in this effort and look forward to working with you to make this entire undertaking a reality.”

5. Proposed Financial Plan to Operate and Maintain Proposed Project

The preliminary projections of the cost to acquire, remodel, develop, furnish and cover contingency expenses and equipment are as follows:

*Capital Project		Other	
Land acquisition	\$0.0	Fundraising (2006-2011)	\$0.8
Construction	2.8	3-Year Program Expansion (consistent with	
Development	1.0	Growth projected in strategic plan)	0.5
Project Contingency	0.9	Transition and start-up costs	0.1
Furnishings & Equipment	0.3	Overall project contingency (~ 2%)	0.1
Sub-total Capital Project	5.0	Sub-total Other	1.5

Total Expenses \$6.5 *(All figures are presented in millions)

NOTE: *The market value of the Oswald site with its acreage and existing buildings is not known. Based on preliminary work done to date, it may cost \$3.0-\$5.0 M more to acquire land and build “from scratch” on another property comparable to the size and location of the Oswald Center. The difference in cost for new construction rather than renovation of existing structures is factored in to this projection.*

**Domestic Violence Services of Snohomish County
Capital Expansion Plan Timeline**

Dates	Project Planning and Completion	Oswald Reserve Center Redevelopment Plan	\$5M Fundraising Campaign
Completed	DVS Strategic Plan Complete and Facility Needs Defined		Advancement and Planning
Aug-08 Sep-08 Oct-08 Nov-08 Dec-08 Jan-09 Feb-09 Mar-09 April-09 May-09 Jun-09 Jul-09	Renovation Plans Refined	Notice of Interest Submitted Local Redevelopment Authority Evaluation and Planning; Agreement Developed	<ul style="list-style-type: none"> • <i>Government sources researched</i> • <i>Top donor prospects identified—foundation, corporations and individuals</i> • <i>New market tax credits and other alternate funding sources researched</i> • <i>Informational meetings with donor prospects</i> • <i>Fundraising campaign plans updated</i>
Aug-09		LRA Re-use Plan approved	
Sep-09 Oct-09 Nov-09 Dec-09 Jan-10 Feb-10 Mar-10 Apr-10 May-10 June-10	<p style="text-align: center;">Pre-Construction</p> <ul style="list-style-type: none"> • <i>Architect selected</i> • <i>Land use permits secured</i> • <i>Environmental assessment and remedial action completed</i> • <i>Design/development plans completed</i> • <i>Contractor selected</i> • <i>Construction documents completed</i> • <i>Construction contract negotiated</i> 		<p>Early, Lead and Major Gifts</p> <ul style="list-style-type: none"> • <i>Early, Lead and Major Gifts</i> • <i>Campaign Steering Committee formed and 20+ volunteers actively engaged</i> • <i>Government grants applied for and secured</i> • <i>New market tax credits or alternate funding secured</i> • <i>Private sector fundraising campaign reaches out to all constituencies</i>
Jul-10	City of Everett Consolidated Plan Completed		
Aug-10 Sep-10 Oct-10 Nov-10			
Dec-10 Jan-11 Feb-11 Mar-11 Apr-11 May-11	Permits Secured from City of Everett	U.S. Army Reserve Vacates Site	
Jun-11 Jul-11 Aug-11 Sep-11 Oct-11 Nov-11 Dec-11 Jan-12 Feb-12 Mar-12 Apr-12 May-12	<p>Renovation Construction</p> <ul style="list-style-type: none"> ➤ <i>Emergency Shelter</i> ➤ <i>Administrative Offices</i> ➤ <i>Day Care Center</i> 		<p>80% of Goal Community Campaign</p> <ul style="list-style-type: none"> • <i>Loud phase of fundraising effort</i> • <i>Entire community invited to participate</i> • <i>Grassroots level gifts and final major and lead gifts secured</i>
June-12	DVS Moves In		100% Goal

Agency Operating Budget
 Past, current and future projections
 (does not include Capital Campaign items)

	2002-03	2008-09	2014-15
Revenue			
Service Contracts	\$1,012,355	\$1,244,000	\$2,111,500
Fund Development	178,500	361,400	770,000
Program Revenue	65,500	213,600	317,000
	\$1,256,355	\$1,819,000	\$3,198,500
Expenses			
Salaries, Taxes, Benefits	\$888,801	\$1,284,200	2,256,800
Professional Services	19,000	24,500	49,000
Fund Development	31,450	76,950	95,900
Program and Operations	247,204	322,322	544,900
General and Administration	69,950	115,000	175,000
	\$1,256,405	\$1,822,972	\$3,121,600

Current DVS Service Contracts

For the 2008-09 fiscal year, DVS is receiving the following public grants for the Emergency Shelter, Transitional Housing, and Legal Advocacy programs:

HUD-Supportive Housing Program:	\$106,669
FEMA Emergency Food and Shelter Program:	5,258
Washington State DSHS Emergency Domestic Violence Shelter Grant	632,324
Washington State DSHS-CSO Community Advocacy:	45,011
Washington State CTED Domestic Violence Legal Advocacy Grant	28,000
Washington State ESAP Emergency Shelter Assistance Program:	56,754
Snohomish County CDBG Community Development Block Grant:	49,230
Snohomish County CSBG Community Services Block Grant:	48,460
Snohomish County ESG Emergency Shelter Grant:	21,550
Snohomish County 2163 Ending Homelessness Program:	63,850
City of Everett CDBG Community Development Block Grant:	15,000
City of Everett Human Needs Grant:	15,000
City of Everett Legal Advocacy Grant:	36,050
City of Mountlake Terrace Legal Advocacy Grant:	32,809
Everett Police Department STOP Grant:	15,487
Cities criminal justice funding – Legal Advocacy:	6,000
United Way of Snohomish County Families Matter Grant:	66,025
Total:	\$1,243,477

F. Local Policy and Regulation issues.

The City of Everett has various land use planning and housing policies, land use and development regulations, and environmental and community impacts it must consider as part of the reuse planning for the Oswald ARC property. The following summarizes applicable policies and regulations

1. City of Everett: 2005 – 2009 Consolidated Plan.

The Consolidated Plan is a requirement of the U. S. Department of Housing and Urban Development related to the City of Everett's receipt of Community Development Block Grant (CDBG) funds. The City has about \$2.6 million each year in CDBG and other federal and local funds to invest in projects and programs that principally benefit low- and moderate-income people. The Consolidated Plan describes the local priorities that guide the decisions for the use of the funds.

The priorities that the City sets out for using the CDBG funds must be consistent with a set of national goals, all of which are intended to improve the lives of lower income people. They are:

- Provide decent, affordable housing
- Improve neighborhoods and provide access to quality public facilities and services
- Expand job opportunities and support economic self-sufficiency

Everett's Local Goals

- Create a range of affordable housing choices for current and future residents of Everett. Through policies, regulations, and investment of public funds address the housing needs of low- and moderate-income households, particularly those with special needs and those who are homeless or at risk of becoming homeless.
- Address the human service needs of Everett's low-income and special needs populations by supporting programs that target basic needs, enhance quality of life, and encourage self-sufficiency.
- Build attractive neighborhoods and improve living conditions for low-income residents by investing in community facilities and in public infrastructure for recreation; transportation and accessibility; safety; and neighborhood interaction.

The City's Consolidated Plan must:

Describe the process the City used to provide information to residents about how funds are being spent and to hear about what residents consider to be the highest priority needs for spending money in the future.

Evaluate the capacity of the system of public and private agencies that the City will rely on (HUD calls this the "institutional structure") to implement the strategies of the Plan.

Describe the ways the City has, and will, coordinate with others (Snohomish County, the State of Washington, other cities) in funding and monitoring planned activities.

Identify trends, housing conditions, income, and economic conditions that need to be considered in planning for and providing assistance to low- and moderate-income people.

Assess the housing market to understand if lower income households can afford housing, are paying more than they can afford, or need assistance to improve their housing conditions.

Identify the needs of homeless people and people with special needs that require public assistance with housing and supportive services.

Summarize the housing and community development needs of low- and moderate-income Everett residents.

Report on 1) the risk of lead poisoning due to the existence/prevalence of lead-based paint in housing and existing facilities, 2) housing discrimination and fair housing practices based on complaint data, and 3) the City's efforts to remove barriers to affordable housing through land use, regulatory, and/or tax policy.

State the City's strategies for addressing needs with descriptions of the activities that are planned and specific outcomes that the City will work to achieve with the funds.

Consultation and Coordination

Joint Public Hearing

HUD requires that jurisdictions coordinate with each other, and with the local organizations and agencies involved in the delivery of housing and community development activities and programs. The jurisdiction is also required to provide multiple opportunities for citizen comments and review.

On November 1, 2004, the City, the Everett Housing Authority (EHA), Snohomish County, and the Snohomish County Housing Authority held a joint public hearing. Agency representatives described the requirements, the planning processes, and the relationship between the City's and County's Consolidated Plans, and the housing authorities' agency plans.

Notice of the Public Hearing was published in the local newspaper one week in advance of the meeting. Notice was also sent to the mailing list of the Citizen's Advisory Committee for Housing and Community Development's that includes citizens, public agencies and other interested parties.

Plan Development

The City and EHA collaborated on the preparation of this *Plan* and EHA's *Streamlined 5-Year Plan for Fiscal Years 2005 – 2009*. Strategies for each plan were developed with the cooperation of the other agency, and EHA was a major source of data for the analysis of housing needs of low- and moderate-income households. In addition, the Executive Director of EHA is a member of the Committee for Housing and Community Development, which was twice briefed on the *Consolidated Plan* during its development. The Committee also reviewed and commented on an initial draft of the *Plan*.

The City also worked closely with Snohomish County in identifying the needs described in the *Plan*, as well as coordinating on proposed strategies.

Citizen and Agency Involvement

The City has provided opportunities for comment and participation from housing and human services agencies, neighborhood groups, and citizens. In addition to the public hearing, agencies serving lower-income households provided information on the needs of their clients, which is included in the *Plan*. They were also interviewed about the capital and program development needs of the agency in preparing the goals and objectives of the *Consolidated Plan*. Finally, citizens were provided with a 30-day period in which to review and comment on the draft *Plan*.

2. Growth Management Comprehensive Plan. The City has a comprehensive plan that includes land use and housing policies that are relevant to the Oswald ARC site and to the DVS proposed re-use plan. The Land Use Map of the Comprehensive Plan designates the site as “Mixed Use Commercial – Multiple Family.” Commercial land use policies in the Land Use Element of the comprehensive plan include policies that call for the integration of housing in commercial areas and the improvement of existing commercial districts. They also call for development in commercial zones to be compatible with surrounding land uses, that commercial property development should be well designed and maintained to enhance the character of the surrounding neighborhood.

The Housing Element policies of the comprehensive plan include the following policies that are relevant to the DVS proposal:

- 3.8.1** The City shall coordinate with the Everett Housing Authority, Snohomish County Housing Authority, non-profit housing providers, and other public and private housing interests to increase the supply of housing for low income and special needs populations within the Everett Planning Area. (Note: survivors of domestic violence are included in the comprehensive plan definition of special needs populations).
- 3.8.2** The City shall continue to make use of available public and private resources to subsidize housing costs for low income households and special needs populations within the Everett Planning Area, within the financial capabilities of the City.
- 3.8.3** The City shall develop strategies to disperse subsidized rental housing equitably throughout the Everett Planning Area and to ensure that not more than 20% of the rental housing within any census tract is government subsidized very low-, low-, or moderate-income housing.
- 4.8.5** The City shall work with social service and non-profit agencies to effectively provide the services required for low-income households and special needs populations, within the financial capabilities of the city.
- 4.8.7** The City shall cooperate with other local governments, non-profit housing providers, and housing authorities to develop a 10-year plan to assist homeless persons find permanent housing, within the financial capabilities of the city.

The above cited policies of the Housing Element of the Comprehensive Plan state the City’s support for programs and organizations that address homeless, low income, and special needs populations. The DVS proposal to expand the facilities and services it currently provides in the Everett community by relocating and growing on the Oswald ARC site is supported by most of these policies. However, Policy 3.8.3 is based on the recognition that certain neighborhoods in the City, including the Oswald ARC neighborhood, have high concentrations of subsidized low income rental housing. While the emergency shelter element of the DVS proposal creates no conflict with this policy, the transitional housing proposed for the south half of the property would, if it serves low income tenants with subsidized housing. If tenants of the transitional housing are not low income households, but prefer the location due to its proximity to services for victims of domestic violence, this policy becomes less important as it pertains to consistency with the comprehensive plan policies.

3. Zoning and Development Standards. The Oswald ARC site is zoned BMU (Broadway Mixed Use), which allows a wide range of commercial and residential uses, including emergency shelter housing through the Special Property Use permit process, social services, business and government administrative offices, day care centers, and high density multiple family housing. The BMU zone was recently added to the Everett zoning code and the Broadway corridor was rezoned to the new zone to encourage a mix of commercial and residential uses with an emphasis on the design guidelines to improve the character of the Broadway corridor over time. Buildings up to 80 feet in height may be constructed in this part of the BMU zone, provided the development meets applicable design standards and floor area regulations.

The Special Property Use (SPU) permit process is required in order to establish a “temporary shelter home,” the definition of which includes “. . . a facility providing temporary shelter for victims of domestic violence, . . .” The SPU permit process requires a public hearing before the City’s Hearing Examiner and review of the proposal for consistency with the following evaluation criteria, as listed in EMC 19.41.150.C:

General Evaluation Criteria. The following general criteria shall be used for evaluating special property uses:

- The need of the neighborhood, district or city for a proposed special property use.
- The adequacy of streets, utilities and public services required to serve a proposed use.
- The impact of traffic generated by the proposed use on the surrounding area, pedestrian circulation and public safety; and the ability of the proponent to mitigate such potential impacts.
- The provision of adequate off-street parking, on-site circulation, and site access.
- Compatibility of proposed structures and improvements with surrounding properties, including the size, height, location, setback and arrangements of all proposed buildings and facilities, especially as they relate to light and shadow impacts on more sensitive land uses and less intensive zones.
- The number, size and location of signs, especially as they relate to more sensitive land uses.
- The landscaping, buffering and screening of buildings, parking, loading and storage areas, especially as they relate to more sensitive land uses.
- The generation of nuisance irritants such as noise, smoke, dust, odor, glare, visual blight or other undesirable impacts.
- Consistency with the goals and policies of the Everett general plan for the area and land use designation in which the property is located.
- Compliance with the provisions of this title and other city, state and federal regulations.

- Accessibility to public transit, and traffic reduction measures proposed by the applicant to reduce dependence of the proposed use on the automobile.

During the public review for the SPU permit, neighbors will have the opportunity to provide input related to the evaluation criteria stated above. The Hearing Examiner may approve, deny, or approve with conditions if necessary to ensure the proposed use is compatible with surrounding uses and that impacts are minimized or mitigated.

4. Environmental and Community Impacts. In addition to the SPU permit process review for compatibility, the City's SEPA environmental review process is required for new construction or additions exceeding certain thresholds. For non-residential use, this threshold is 4,000 square feet, and for residential construction, the threshold is 4 dwelling units. Any proposal exceeding these thresholds is subject to preparation of an environmental checklist through a public review process of environmental impacts. The City may apply mitigation measures through this process to ensure that environmental impacts not already regulated by other City codes are not significant.

5. Other Identified Issues. City staff has raised two issues of concern related to the DVS proposal:

- Underutilization of the south portion of the property if the transitional housing is not allowed by virtue of the city council choosing not to amend the policy of the Consolidated Plan pertaining to new construction of subsidized low income housing in areas where more than 20% of the existing housing stock is comprised of subsidized housing units. If the City Council determines that this policy is so important that it will not allow for continued concentration of subsidized low income housing in this neighborhood, the south half of the parking lot would remain a large, paved parking lot that would meet DVS' parking needs, but with substantially more pavement than needed. Staff has suggested that if the Consolidated Plan policy is not amended, another use should be identified for this portion of the site.
- Under-building the site in terms of the permitted density and the City's need for additional housing to accommodate anticipated growth. DVS has indicated that it needs 20 transitional housing units, assuming the Consolidated Plan policy is amended. The south portion of the property has approximately one acre that is not needed for the parking demand of the DVS shelter and administrative building. The density of 20 dwellings per acre is much lower than the site will accommodate under the BMU zoning. In response to staff's concern, DVS has indicated that twenty (20) units is a more realistic number given the transitional housing demand experienced historically by DVS.

G. Other Uses Considered

During the review of the NOI proposals by the citizens committee, City staff and DVS identified the Consolidated Plan policy related to the over-concentration of subsidized low income housing within the Oswald ARC neighborhood as an issue needing to be addressed. In order to determine if the transitional housing on the south half of the site could be allowed, this policy must be revised to allow the DVS – EHA partnership to develop the housing on the south half of the site. The citizens committee, in recommending approval of the DVS emergency shelter for the existing buildings on the property, asked staff to evaluate other potential uses for the south

part of the property in the event that the City Council, in their review of the Consolidated Plan update, which will occur after the LRA recommends a re-use plan, does not change the policy.

City staff contacted several other potential homeless service providers and providers of services with public benefit to see if they were interested in a portion of the Oswald ARC property to complement the DVS use of the existing buildings and provide a needed service in the neighborhood and community. Uses that were considered included food banks, medical clinics, senior housing and services, long-term respite care, and market rate housing. None of the organizations contacted by the City expressed an interest in the site.

H. Plan Contingencies

1. Delay In Performance

To the extent that delays in the performance of DVS's financial obligations including but not limited to the development of plans and specifications, securing funding commitments or commencement and completion of construction of the planned improvements are due to causes beyond DVS's reasonable control and without its negligence, DVS shall not be considered in breach of its obligations under the Legally Binding Agreement and the time for performance of the obligation shall be extended by the LRA. Within thirty (30) days after becoming aware of any delay in performance as previously referenced above, DVS shall promptly request an extension of time in writing from the LRA not to exceed six (6) months.

2. Alternative Re-Use Plan

Failure of DVS to obtain sufficient funding to implement the re-use plan after exercising its best efforts shall affect the right of the LRA to terminate the Legally Binding Agreement with DVS. The LRA shall develop an alternative plan which divides the property into two (2) parcels consisting of a southern section containing approximately 1.5 acres (the "Southern Parcel"), and a northern section containing approximately 1.5 acres (the "Northern Parcel"). The LRA shall develop and submit an Alternative Re-use Plan for the property which includes a use on the "Northern Parcel" which addresses the needs of the homeless population and new affordable housing construction on the "Southern Parcel."

I. Homeless submission to HUD

A separate document that describes how the City has addressed homeless needs in the community as part of the re-use plan has been prepared for submission to the Department of Housing and Urban Development.

J. Legally Binding Agreement

The federal re-use planning process requires that the LRA prepare a Legally Binding Agreement (LBA) that will apply to any conveyance of property from the Department of Defense to a selected user for the property. The LBA must include requirements that apply to the use of the property by the new owner, and restrictions on sale or re-conveyance of the property. A Homeless Service Conveyance requires a 30-year commitment to maintain service to the homeless in the community.

K. Property Conveyance Process

After the LRA has approved a re-use plan, HUD has approved the Homeless Submission, and a Legally Binding Agreement has been executed, the Army will convey the property to a selected user. The LRA has the authority to approve the use of the property, but the user must be approved by the Army.

L. SEPA Process

The City has prepared a SEPA Environmental Determination of Non-Significance (SEPA #09-011) for the Oswald ARC Re-use Plan. Future development on the site may require additional SEPA analysis.

M. NEPA Process.

The Army will prepare a NEPA environmental document prior to conveying the property to the end user.

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APPENDIX B – CONSULTATION LETTERS



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

March 23, 2011

Directorate of Public Works

Steve Mullen
Cultural Resource Director
Snoqualmie Nation
PO Box 969
8130 Railroad Avenue, Suite 103
Snoqualmie, WA 98065

Dear Mr. Mullen:

The United States Army Reserve (USAR), 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed closure and reuse of the Major David P. Oswald United States Army Reserve Center (USARC), Everett, Washington, in accordance with recommendations of the Base Realignment and Closure (BRAC) Commission.

On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended the closure of the Oswald USARC in Snohomish County, Washington and realignment of essential missions to other installations. As this recommendation was part of a group approved by the President and unaltered by Congress it became law on November 9, 2005 in conformance with the provisions of the BRAC Act of 1990, Public Law 101-510, as amended. To enable implementation of these recommendations, the Army proposes to relocate units to a new USARC in Marysville, Washington.

The EA will analyze and document environmental and socioeconomic impacts of disposing of the property and reasonable and foreseeable reuse alternatives. The 3-acre USARC property, once deactivated, will be excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The following presents the BRAC disposal and reuse planned as part of the realignment actions and their locations at the Oswald USARC, located at 1110 Rainier Avenue in Everett, Washington – Snohomish County (enclosures 1 and 2):

Four permanent structures are located on the grounds of the USARC, an 11,800 SF administrative building (Oswald Hall), a 2,500 SF organizational maintenance shop (OMS), a brick storage building, and a three-sided cinderblock hazardous materials structure. A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area are also on

the property. The Preferred Alternative would allow the Domestic Violence Services (DVS) of Snohomish County to reuse the Oswald USARC as a shelter to victims of domestic violence and their children. The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide the support to the victims of domestic violence, and a daycare for children of residents of the emergency shelter.

At this time, in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 CFR Part 800, the 88th RSC wishes to formally initiate consultation with you concerning this action. To ensure that any areas of sacred or spiritual importance to Native American groups are taken into consideration as part of this process, we would appreciate your help in identifying any areas of interest or any concerns you may have regarding Traditional Cultural Properties (TCPs) or other traditional resources or historic properties within the project area shown on the enclosed maps. Our information indicates that members of your tribes may be descended from Indians who lived in the Everett area. We therefore seek your assistance in locating, identifying, and, if any sites are identified, developing appropriate treatment plans for TCPs, and archaeological sites.

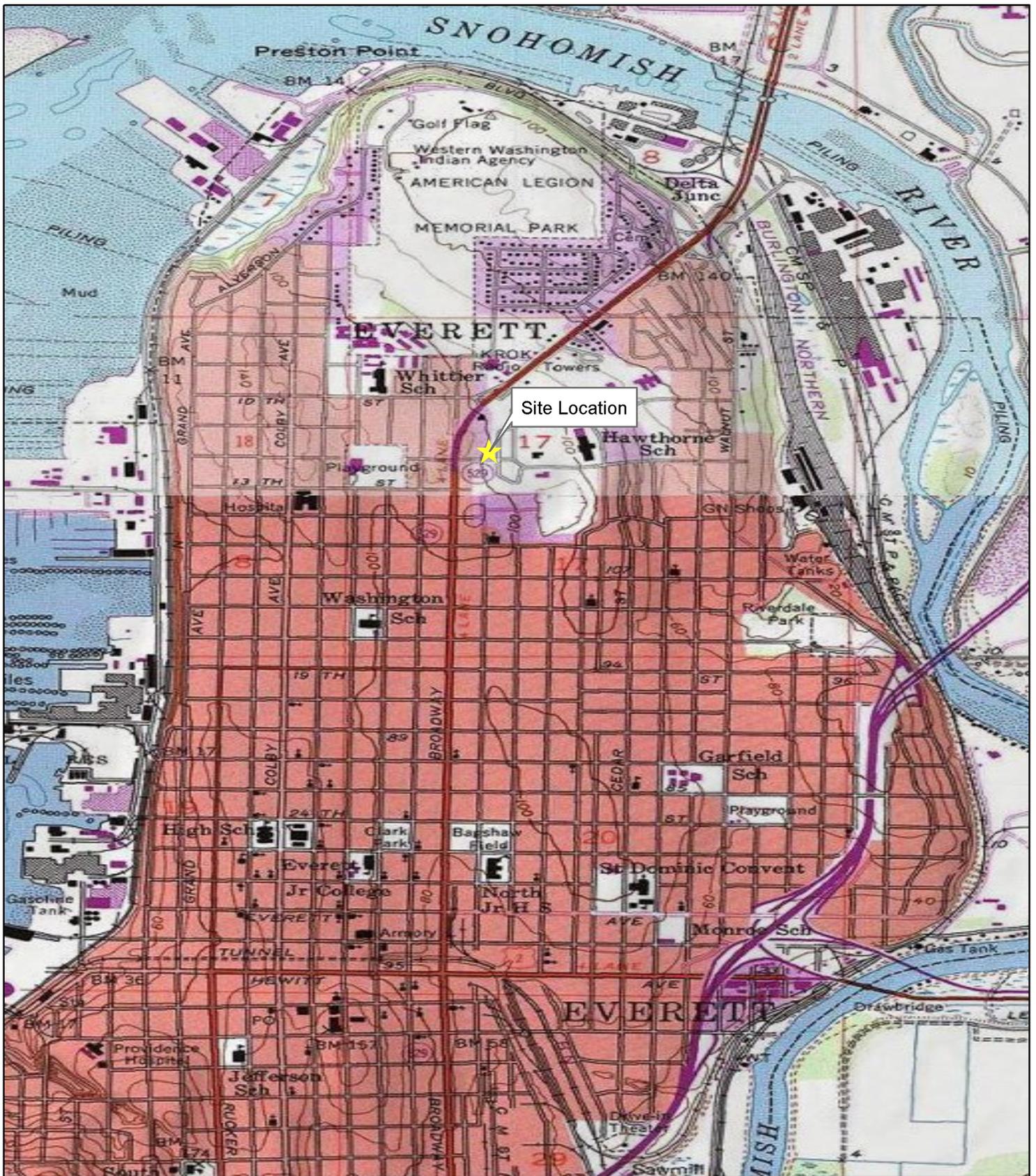
I would like to thank you in advance for your efforts and would greatly appreciate a response within thirty (30) days. If you have concerns regarding issues related to the project, please send correspondence and other communication regarding this matter to Ms. Meline Skeldon, 88th RSC BRAC Environmental Coordinator at 206-301-2177, or email at meline.skeldon@usar.army.mil.

Sincerely,



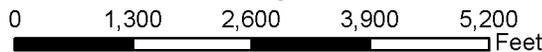
Thomas C. G. Helgeson
Deputy Director, Public Works

Enclosures



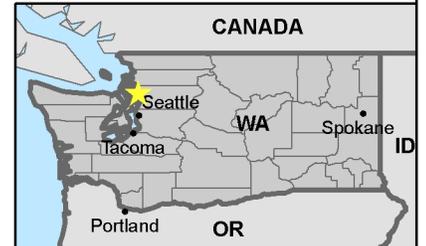
**Oswald USARC
Everett, WA
Location Map**

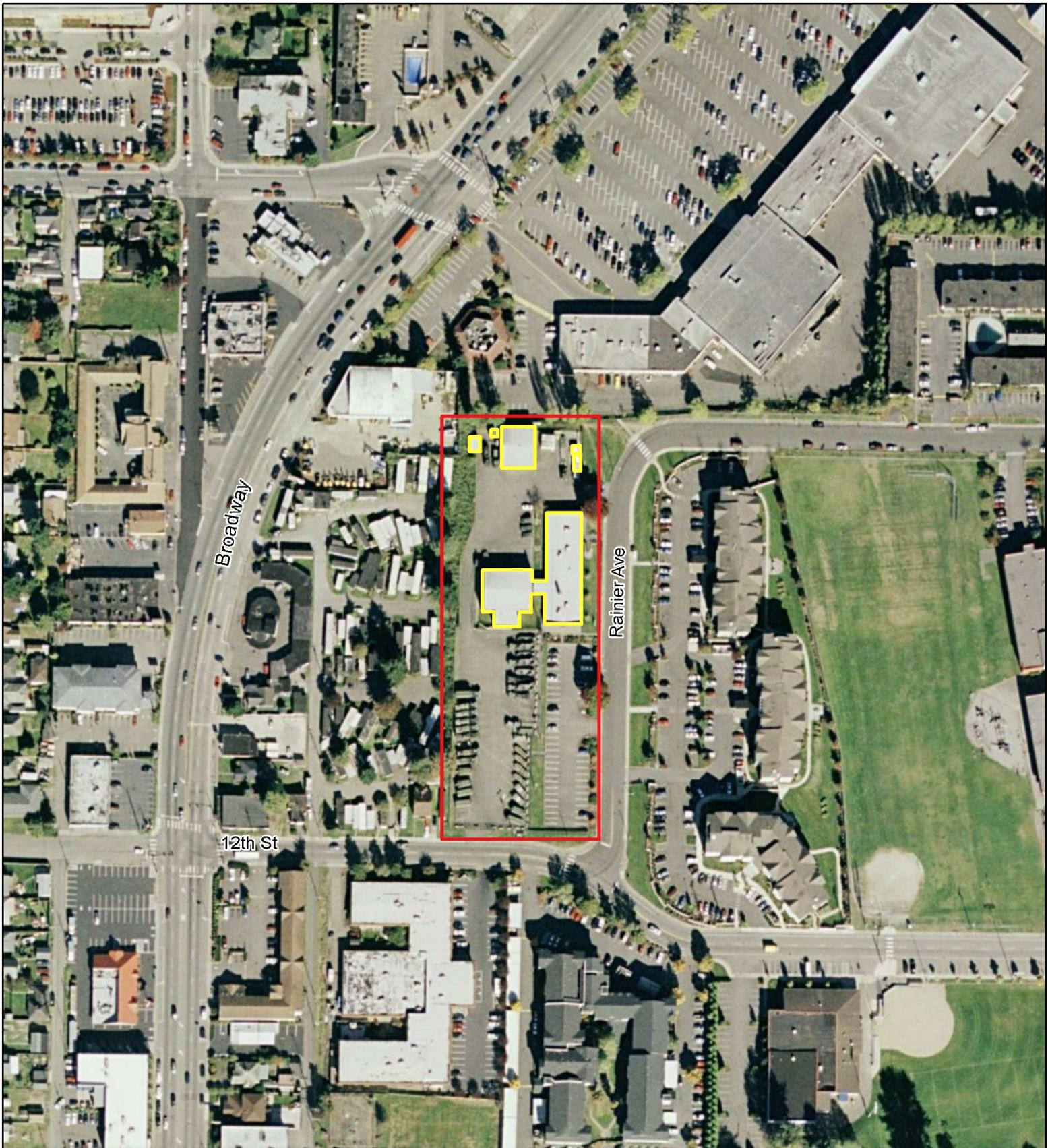
S17 T29N R5E, Williamette Meridian



Source: ESRI
Coordinate System: NAD 1983
Universe Transverse Mercator Zone

MAP INDEX





Legend

- Buildings
- Facility Boundary

**Oswald USARC
Everett, WA
Facility Map**

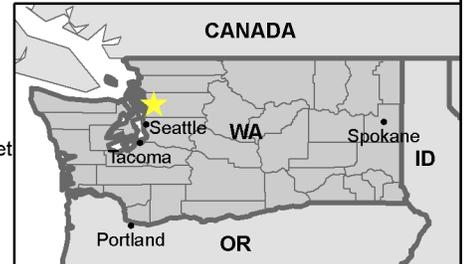
S17 T29N R5E, Williamette Meridian



Source: ESRI

Coordinate System: NAD 1983
Universe Transverse Mercator Zone

MAP INDEX





DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

REPLY TO
ATTENTION OF

March 23, 2011

Directorate of Public Works

Larry Campbell
Cultural Resource Protection Office
Swinomish Indian Tribal Community
11430 Moorage Way
LaConner, WA 98257-8707

Dear Mr. Campbell:

The United States Army Reserve (USAR), 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed closure and reuse of the Major David P. Oswald United States Army Reserve Center (USARC), Everett, Washington, in accordance with recommendations of the Base Realignment and Closure (BRAC) Commission.

On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended the closure of the Oswald USARC in Snohomish County, Washington and realignment of essential missions to other installations. As this recommendation was part of a group approved by the President and unaltered by Congress it became law on November 9, 2005 in conformance with the provisions of the BRAC Act of 1990, Public Law 101-510, as amended. To enable implementation of these recommendations, the Army proposes to relocate units to a new USARC in Marysville, Washington.

The EA will analyze and document environmental and socioeconomic impacts of disposing of the property and reasonable and foreseeable reuse alternatives. The 3-acre USARC property, once deactivated, will be excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The following presents the BRAC disposal and reuse planned as part of the realignment actions and their locations at the Oswald USARC, located at 1110 Rainier Avenue in Everett, Washington – Snohomish County (enclosures 1 and 2):

Four permanent structures are located on the grounds of the USARC, an 11,800 SF administrative building (Oswald Hall), a 2,500 SF organizational maintenance shop (OMS), a brick storage building, and a three-sided cinderblock hazardous materials structure. A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area are also on the property. The Preferred Alternative would allow the Domestic Violence Services (DVS) of

Snohomish County to reuse the Oswald USARC as a shelter to victims of domestic violence and their children. The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide the support to the victims of domestic violence, and a daycare for children of residents of the emergency shelter.

At this time, in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 CFR Part 800, the 88th RSC wishes to formally initiate consultation with you concerning this action. To ensure that any areas of sacred or spiritual importance to Native American groups are taken into consideration as part of this process, we would appreciate your help in identifying any areas of interest or any concerns you may have regarding Traditional Cultural Properties (TCPs) or other traditional resources or historic properties within the project area shown on the enclosed maps. Our information indicates that members of your tribes may be descended from Indians who lived in the Everett area. We therefore seek your assistance in locating, identifying, and, if any sites are identified, developing appropriate treatment plans for TCPs, and archaeological sites.

I would like to thank you in advance for your efforts and would greatly appreciate a response within thirty (30) days. If you have concerns regarding issues related to the project, please send correspondence and other communication regarding this matter to Ms. Meline Skeldon, 88th RSC BRAC Environmental Coordinator at 206-301-2177, or email at meline.skeldon@usar.army.mil.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Helgeson', with a long horizontal flourish extending to the right.

Thomas C.G. Helgeson
Deputy Director, Public Works

Enclosures



DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

REPLY TO
ATTENTION OF

March 23, 2011

Directorate of Public Works

Shawn Yanity
Chair
Stillaguamish Tribe
3310 Smokey Point Drive
PO Box 277
Arlington, WA 98223-0277

Dear Mr. Yanity:

The United States Army Reserve (USAR), 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed closure and reuse of the Major David P. Oswald United States Army Reserve Center (USARC), Everett, Washington, in accordance with recommendations of the Base Realignment and Closure (BRAC) Commission.

On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended the closure of the Oswald USARC in Snohomish County, Washington and realignment of essential missions to other installations. As this recommendation was part of a group approved by the President and unaltered by Congress it became law on November 9, 2005 in conformance with the provisions of the BRAC Act of 1990, Public Law 101-510, as amended. To enable implementation of these recommendations, the Army proposes to relocate units to a new USARC in Marysville, Washington.

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Sincerely,



Thomas C.G. Helgeson
Deputy Director, Public Works

Enclosures



DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

REPLY TO
ATTENTION OF

March 23, 2011

Directorate of Public Works

Richard Young
Cultural Resources
Tulalip Tribes
Hibulb Cultural Center and Nature Preserve
6410 23rd Avenue NE
Tulalip, WA 98271

Dear Mr. Young:

The United States Army Reserve (USAR), 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed closure and reuse of the Major David P. Oswald United States Army Reserve Center (USARC), Everett, Washington, in accordance with recommendations of the Base Realignment and Closure (BRAC) Commission.

On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended the closure of the Oswald USARC in Snohomish County, Washington and realignment of essential missions to other installations. As this recommendation was part of a group approved by the President and unaltered by Congress it became law on November 9, 2005 in conformance with the provisions of the BRAC Act of 1990, Public Law 101-510, as amended. To enable implementation of these recommendations, the Army proposes to relocate units to a new USARC in Marysville, Washington.

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the property. The Preferred Alternative would allow the Domestic Violence Services (DVS) of Snohomish County to reuse the Oswald USARC as a shelter to victims of domestic violence and their children. The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide the support to the victims of domestic violence, and a daycare for children of residents of the emergency shelter.

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I would like to thank you in advance for your efforts and would greatly appreciate a response within thirty (30) days. If you have concerns regarding issues related to the project, please send correspondence and other communication regarding this matter to Ms. Meline Skeldon, 88th RSC BRAC Environmental Coordinator at 206-301-2177, or email at meline.skeldon@usar.army.mil.

Sincerely,

A handwritten signature in black ink, appearing to read 'TCH', with a long horizontal flourish extending to the right.

Thomas C.G. Helgeson
Deputy Director, Public Works

Enclosures



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

23 March 2011

Directorate of Public Works

Dr. Allyson Brooks
Department of Archeology and Historic Preservation
Washington State
P.O. 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

The United States Army Reserve, 88th Regional Support Command (RSC) wishes to formally initiate consultation with the Washington State Historic Preservation Office under Section 106 of the National Historic Preservation Act (NHPA) for the disposal of Oswald U. S Army Reserve Center (USARC) in Everett, Washington. We have identified this action as an undertaking, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP).

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the Major David P. Oswald USARC (see enclosed map) and realignment of essential missions to other installations. As this recommendation was part of a group approved by the President and unaltered by Congress it became law on November 9, 2005 in conformance with the provisions of the BRAC Act of 1990, Public Law 101-510, as amended.

The specific language of the BRAC Commission recommendation was as follows:

“Close the Oswald United States Army Reserve Center, Everett, WA, and relocate units to a new Armed Forces Reserve Center in the Everett, WA area if the Army is able to acquire suitable land for construction of the new facility.”

The 3-acre USARC property, once deactivated, will be excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. The Army is preparing an Environmental Assessment (EA) to address the environmental and socioeconomic impacts of disposing of the property and reasonable and foreseeable reuse alternatives.

The 3-acre property occupied by the Oswald USARC was granted to the United States of America from the Everett Improvement Company on June 15, 1943. It is located at 1110 Rainier Avenue in Everett, Washington. Four permanent structures are located on the grounds of the USARC, an 11,800 SF main administrative building (Oswald Hall), a 2,500 SF

Organizational Maintenance Shop (OMS), a brick storage building, and a three-sided cinderblock hazardous materials structure. A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area are also on the property. Oswald Hall and the OMS were constructed in 1959 on concrete foundations and consist of concrete block walls covered with a brick exterior (see enclosed exterior photographs). Approximately 90 percent of the USARC property is covered by impervious surface, hardstand or concrete building foundation. The remaining ground surface is covered by lawn, gravel, and a sparse population of landscape shrubs and trees.

The Army is not yet prepared to make a formal determination of effect under the regulations implementing Section 106 of the NHPA for its disposal of the Oswald USARC - potentially to a non-Federal agency - as it is only now completing a survey and evaluation of the presence of resources eligible for the National Register of Historic Places. This survey is being conducted by an architectural historian consultant meeting the qualifications of the Secretary of Interior Standards and should be available shortly. It seems evident to us that such resources, if present, would be architectural. The potential for archaeological resources is minimal, as the USARC property can be characterized as a modern urban environment that has been disturbed by construction and almost completely paved.

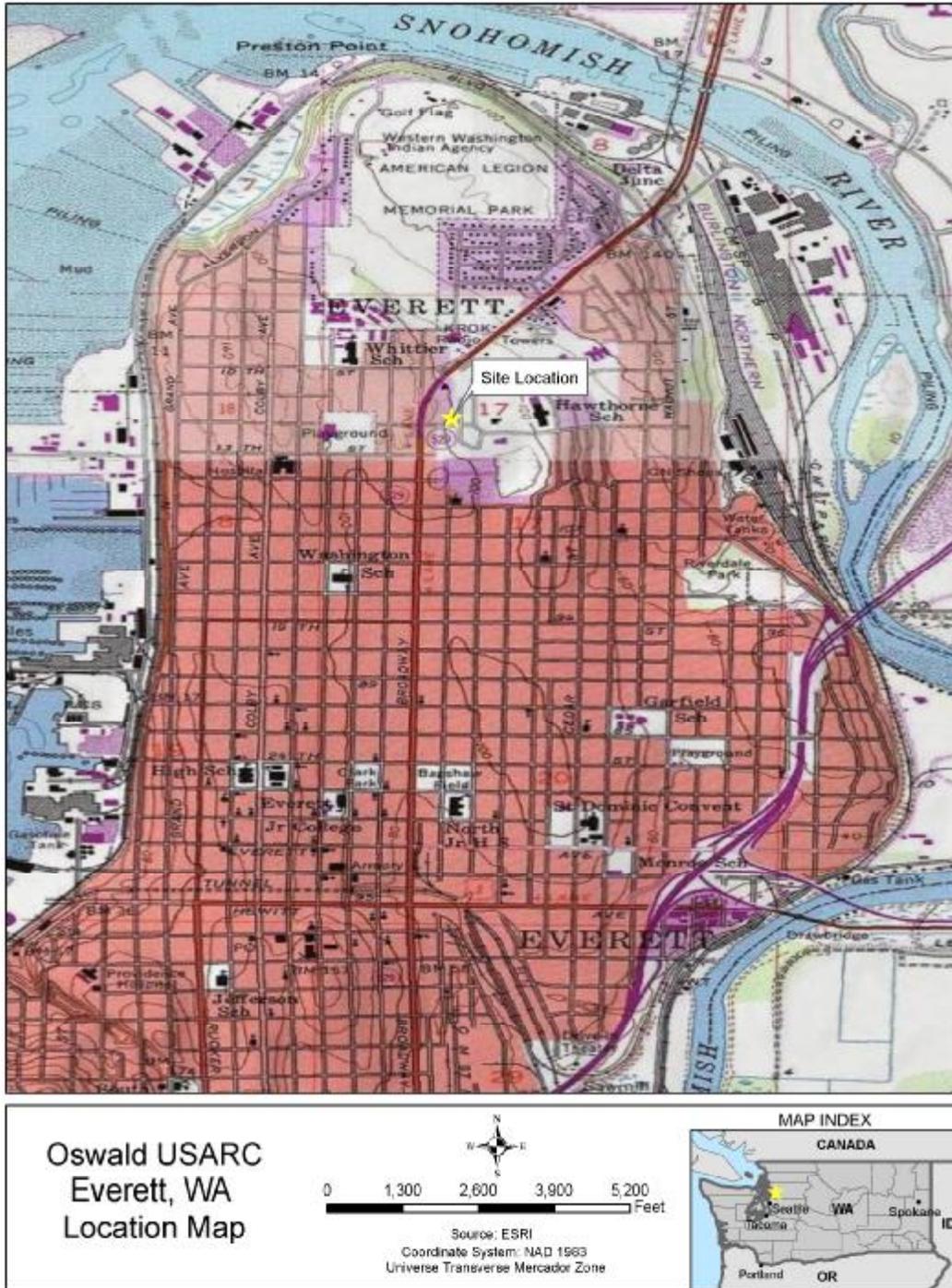
Thank you again for your assistance. If you have any questions, please send correspondence and other communication regarding this matter to Ms. Meline Skeldon, 88th RSC BRAC Environmental Coordinator at 206-301-2177, or email at meline.skeldon@usar.army.mil.

Sincerely,

David L. Moore
Chief, Public Works-Environmental Division

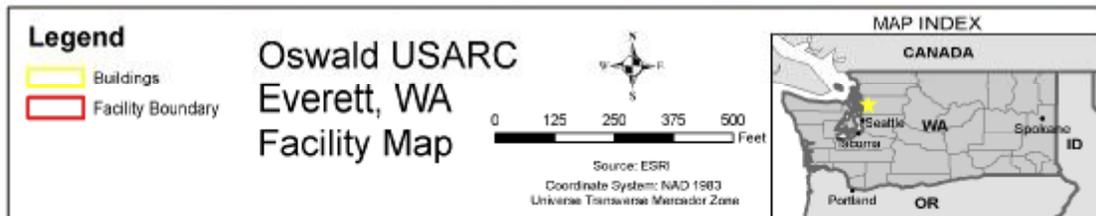
Enclosures

Enclosure 1: Project
Vicinity



Enclosure 2:

Oswald USARC Project Area



**Enclosure 3:
Exterior Photographs of the Oswald USARC Property**



Oswald Hall



Oswald OMS



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501

Mailing address: PO Box 48343 • Olympia, Washington 98504-8343

(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

April 5, 2011

Ms. Meline Skeldon
70Th Regional Support Command
ATTN: AFRC-CWA-ENP, 4570 TEXAS WA W.
Fort Lawton, WA 98199-1015

In future correspondence please refer to:

Log: 040511-13-DOA

Property: Oswald Army Reserve Center Realignment and Closure

Re: APE Concur

Dear Ms. Skeldon:

We have reviewed the materials forwarded to our office for the above referenced project. Thank you for your description of the area of potential effect (APE) for the project. We concur with the definition of the APE. We look forward to the results of your cultural resources survey efforts, your consultation with the concerned tribes, and receiving the survey report and historic property inventory. We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

June 1, 2011

Mr. David Moore
Department of the Army
88th Regional Support Command
60 South O Street
Fort McCoy, WI 54656

In future correspondence please refer to:

Log: 040511-13-DOA
Property: Oswald Army Reserve Center Realignment and Closure
Re: NOT Eligible

Dear Mr. Moore:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced property has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

Research indicates that the above referenced property is not currently listed in the Washington Heritage Register or National Register of Historic Places. The Oswald Army Reserve Center is NOT ELIGIBLE for the National Register of Historic Places. As a result of this finding, further contact with DAHP is not necessary. However, if additional information on the property becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov



DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

Protect the Past, Shape the Future



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

29 March 2011

Directorate of Public Works

Ms. Carolyn Scafidi
Mgr. Federal Activities Branch
U.S. Fish and Wildlife Service
510 Desmond Drive SE
Suite 102
Lacey, WA 98506

Dear Ms. Scafidi:

The Department of the Army (DA), 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed closure and reuse of the Major David P. Oswald United States Army Reserve Center (USARC) in Everett, Washington resulting from Base Realignment and Closure (BRAC) recommendations. This recommendation was part of a group approved by the President and unaltered by Congress it became law on November 9, 2005 in conformance with the provisions of the BRAC Act of 1990, Public Law 101-510, as amended. To enable implementation of these recommendations, the Army proposes to relocate units to a new Armed Forces Reserve Center (AFRC) in Marysville, Washington.

The 88th RSC is initiating this informal Section 7 consultation in accordance with the Endangered Species Act (ESA) and the National Environmental Policy Act (NEPA) of 1969 to confirm that no federally endangered, threatened or candidate species are known to occur on the Oswald United States Army Reserve Center (USARC) site and that no additional or formal consultation under Section 7 of the ESA is necessary. Based on available information we do not anticipate that the project will impact any federally listed species, migratory birds, or wetlands.

The EA will analyze and document environmental and socioeconomic impacts of disposing of the property and reasonable and foreseeable reuse alternatives. The 3-acre USARC property, once deactivated, will be excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. The EA is being prepared in strict accordance with the NEPA of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); and the Army 2006 Base Realignment and Closure Manual for Compliance with NEPA.

The following presents the BRAC disposal and reuse planned as part of the realignment actions and their locations at the Oswald USARC, located at 1110 Rainier Avenue in Everett, Washington – Snohomish County (enclosures 1 and 2).

Four permanent structures are located on the grounds of the USARC, an 11,800 SF administrative building (Oswald Hall), a 2,500 SF organizational maintenance shop (OMS), a brick storage building, and a three-sided cinderblock hazardous materials structure. A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area are also on the property. The Preferred Alternative would allow the Domestic Violence Services (DVS) of Snohomish County to reuse the Oswald USARC as a shelter to victims of domestic violence and their children. The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide the support of the victims of domestic violence, and a daycare for children of residents of the emergency shelter.

In accordance with the NEPA, ESA, and the Fish and Wildlife Coordination Act, an evaluation of the potential effects (both beneficial and adverse) associated with implementing this action is required. We are requesting your input concerning any biological concerns regarding this action, such as the presence of federally listed threatened or endangered species, or critical habitat. The affected areas where the construction projects associated with the BRAC realignment actions are shown in the enclosures.

Approximately 90 percent of the USARC property is covered by impervious surface, hardstand or concrete building foundation. The remaining ground surface is covered by lawn, gravel, and a sparse population of landscape shrubs and trees. The attached 2009 Natural Resource Survey (enclosure 3) found that there is no suitable habitat within the USARC property for the federally-listed species found in Snohomish County.

Thank you in advance for your cooperation in this matter. Your prompt consideration and response would be greatly appreciated. Please direct any comments to Ms. Meline Skeldon, 88th RSC BRAC Environmental Coordinator at 206-301-2177, or via email at Meline.Skeldon@usar.army.mil. Please address and mail written correspondence to the address noted above.

Sincerely,

David L. Moore
Chief, Public Works-Environmental Division

Enclosures

Byron, Rebecca

From: Skeldon, Meline E Ms CTR 88TH RSC -NA- [meline.skeldon@usar.army.mil]
Sent: Friday, April 08, 2011 12:55 PM
To: Byron, Rebecca
Cc: Blue-Sky, Megan; Braman, Marshal E CTR CTR USAR 88TH RSC ARIM
Subject: FW: closure of the Major David P. Oswald U.S. Army Reserve Center (UNCLASSIFIED)
Signed By: meline.skeldon@us.army.mil

Follow Up Flag: Follow up
Flag Status: Flagged

Classification: UNCLASSIFIED
Caveats: NONE

Hi Rudi,

Below is USFWS response to the Oswald closure and Reuse Plan Letter for the Environmental Assessment.

Thanks,

Meline

-----Original Message-----

From: [Kent Livezey@fws.gov](mailto:Kent.Livezey@fws.gov) [<mailto:Kent.Livezey@fws.gov>]
Sent: Friday, April 08, 2011 8:33 AM
To: Skeldon, Meline E Ms CTR 88TH RSC -NA-
Cc: [Carolyn Scafidi@fws.gov](mailto:Carolyn.Scafidi@fws.gov)
Subject: closure of the Major David P. Oswald U.S. Army Reserve Center

Hi Meline,

This is in response to your letter dated March 29, 2011, concerning closure of the Major David P. Oswald U.S. Army Reserve Center in Everett, Washington. I suggest you consider closure of this facility to be a "no effect" action relative to section 7 of the Endangered Species Act because there are no threatened or endangered species that would be affected by this action. As you probably know, "no effect" determinations are left to action agencies to make and require no concurrence by the U.S. Fish and Wildlife Service.

Please let me know if you have any questions,
Kent

Kent Livezey
U.S. Fish and Wildlife Service
Washington Fish and Wildlife Office
Forest Resources Branch
510 Desmond Drive SE, Lacey, WA 98503
office: 360.753.4372; cel: 253.320.0545
kent.livezey@fws.gov

Classification: UNCLASSIFIED
Caveats: NONE



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND
60 SOUTH O STREET
FORT MCCOY, WISCONSIN 54656

28 March 2011

Directorate of Public Works

Chris Maurer
Department of Ecology
Washington State
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Maurer:

On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended the closure of the Oswald USARC in Everett, Washington and realignment of essential missions to other installations. As this recommendation was part of a group approved by the President and unaltered by Congress it became law on November 9, 2005 in conformance with the provisions of the BRAC Act of 1990, Public Law 101-510, as amended. To enable implementation of these recommendations, the Army proposes to relocate units to a new Armed Forces Reserve Center (AFRC) in Marysville, Washington.

The Department of the Army (DA), 88th Regional Support Command (RSC) is preparing an Environmental Assessment (EA) for the proposed closure and reuse of the Major David P. Oswald United States Army Reserve Center (USARC) resulting from Base Realignment and Closure (BRAC) recommendations. The EA will analyze and document environmental, cultural and socioeconomic impacts of disposing of the property and reasonable and foreseeable reuse alternatives. The 3-acre USARC property, once deactivated, will be excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The following presents the BRAC disposal and reuse planned as part of the realignment actions and their locations at the Oswald USARC, located at 1110 Rainier Avenue in Everett, Washington – Snohomish County (enclosures 1 and 2).

Four permanent structures are located on the grounds of the USARC, an 11,800 SF main administrative building (Oswald Hall), a 2,500 SF organizational maintenance shop (OMS), a brick storage building, and a three-sided cinderblock hazardous materials structure. A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area are also on the property. The Preferred Alternative would allow the Domestic Violence Services (DVS) of Snohomish County to reuse the Oswald USARC as a shelter to victims of domestic violence and

their children. The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide the support of the victims of domestic violence, and a daycare for children of residents of the emergency shelter.

Three Alternatives are being evaluated in the EA for the Oswald USARC. Under the first alternative, the No Action Alternative, the Oswald USARC would continue to be operated by the Army at levels similar to those that occurred prior to the BRAC Commission's recommendation for closure becoming final.

The second alternative, Caretaker Status, would allow a period of time between closure and transfer of the site during which the site would receive minimal maintenance. After the military mission has ended, the Army would secure the Oswald USARC. From the time of operational closure until conveyance of the property, the Army would provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment.

The Preferred Alternative is Traditional Disposal and Reuse. Under this alternative, the Army would close the Oswald USARC for reuse by the Domestic Violence Services (DVS) of Snohomish County.

- Phase I - Oswald Hall would be remodeled to house the agency's non-shelter services, a multi-purpose room, separate rooms for staff to interview and counsel domestic violence victims, and a staff office. The building would also support functions such as laundry facilities, storage and a computer server room. The gymnasium would be turned into a 60-bed domestic violence shelter. A second floor would be added and an additional 2,000 square feet would be constructed onto the gymnasium. The plan also includes the option to construct a new shelter structure to the north or south of the existing gymnasium.
- Phase II - The OMS would be remodeled for use as a child care facility. In the short term, the facility would be used for storage.
- Phase III – If approved by the City of Everett, the southern portion of the site would be developed for a 20-unit facility for transitional housing to serve women and children who are leaving the shelter.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies 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
- Mitigation or permitting requirements that may be necessary for project implementation.

Thank you in advance for your cooperation in this matter. Your prompt consideration and response would be greatly appreciated. Please direct any comments to Ms. Meline Skeldon,

88th RSC BRAC Environmental Coordinator at 206-301-2177, or via email at Meline.Skeldon@usar.army.mil. Please address and mail written correspondence to the address noted above.

Sincerely,

David L. Moore
Chief, Public Works-Environmental Division

Enclosures

Byron, Rebecca

From: Skeldon, Meline E Ms CTR 88TH RSC -NA- [meline.skeldon@usar.army.mil]
Sent: Monday, April 18, 2011 4:17 PM
To: Byron, Rebecca; Plakorus, David
Cc: Price, Catherine
Subject: FW: Environmental Assessments - Fort Lawson, Oswald Army Reserve Center (UNCLASSIFIED)
Signed By: meline.skeldon@us.army.mil

Follow Up Flag: Follow up
Flag Status: Flagged

Classification: UNCLASSIFIED
Caveats: NONE

This is from the State Regulator, Washington Department of Ecology.

-----Original Message-----

From: Maurer, Christopher (ECY) [<mailto:cmou461@ECY.WA.GOV>]
Sent: Monday, April 18, 2011 3:00 PM
To: Skeldon, Meline E Ms CTR 88TH RSC -NA-
Subject: Environmental Assessments - Fort Lawson, Oswald Army Reserve Center

Meline,

I have received your notices of environmental assessments for the above two sites.

Oswald Army Reserve Center - because of the future presence of a sensitive sub-group - children - at the proposed day care center, particular attention should be paid to characterizing the Operational Maintenance Building for asbestos and lead paint as well as other organic or petroleum based contaminants. If present, complete and careful remediation of any contamination will be necessary.

Fort Lawton - no comments at this time.

When will the draft environmental assessments be available for review?

Chris Maurer

Classification: UNCLASSIFIED
Caveats: NONE



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

September 9, 2011

Mr. David L. Moore
United States Department of the Army
HQ, 88th Regional Support Command
60 South O Street
Fort McCoy, Wisconsin 54656

Re: Federal Consistency - Oswald USARC

Dear Mr. Moore:

The Department of Ecology, Shorelands and Environmental Assistance Program has received a Coastal Zone Management Consistency Determination for the closure, transfer, and reuse of the Oswald United States Army Reserve Center property in Everett, Washington.

Upon review, Ecology concurs with the determination and assessment that the proposal is consistent, to the maximum extent practicable, with Washington State Coastal Zone Management Plan's enforceable policies.

If you have any questions regarding this letter please contact Loree' Randall at (360) 407-6068.

Sincerely,

Brenden McFarland, Section Manager
Environmental Review and Transportation Section
Shorelands and Environmental Assistance Program

cc: Loree' Randall, Ecology



**APPENDIX C – ECONOMIC IMPACT FORECAST SYSTEM
(EIFS) MODEL**

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ECONOMIC IMPACT FORECAST SYSTEM (EIFS) MODEL

SOCIOECONOMIC IMPACT ASSESSMENT

Socioeconomic impacts are linked through cause-and-effect relationships. Military payrolls and local procurement contribute to the economic base for the region of influence (ROI). In this regard, the BRAC closure action proposed in Everett, Washington would have a multiplier effect on the local and regional economy. With the Proposed Action, direct jobs would be created, generating new income and increasing personal spending. This spending generally creates secondary jobs, increases business volume, and increases revenues for schools and other social services.

THE ECONOMIC IMPACT FORECAST SYSTEM

The U.S. Army, with the assistance of many academic and professional economists and regional scientists, developed the Economic Impact Forecast System (EIFS) to address the economic impacts of NEPA-requiring actions and to measure their significance. As a result of its designed applicability, and in the interest of uniformity, EIFS should be used in NEPA assessments for BRAC. The entire system is designed for the scrutiny of a populace affected by the actions being studied. The algorithms in the EIFS model are simple and easy to understand, but still have firm, defensible bases in regional economic theory.

EIFS is developed under a joint project of the U.S Army Corps of Engineers (USACE), the Army Environmental Policy Institute (AEPI), and the Computer and Information Science Department of Clark Atlanta University, Georgia. EIFS is an on-line system, and the EIFS Web application is hosted by the USACE, Mobile District. The system is available to anyone with an approved user-id and password. University staff and the staff of USACE, Mobile District are available to assist with the use of EIFS.

The databases in EIFS are national in scope and cover the approximately 3,700 counties, parishes, and independent cities that are recognized as reporting units by federal agencies. EIFS allows the user to define an economic ROI by identifying the counties, parishes, or cities to be analyzed. Once the ROI is defined, the system aggregates the data, calculates multipliers and other variables used in the various models in EIFS, and prompts the user for forecast input data.

THE EIFS MODEL

The basis of the EIFS analytical capabilities is the calculation of multipliers that are used to estimate the impacts resulting from Army-related changes in local expenditures or employment. In calculating the multipliers, EIFS uses the economic base model approach, which relies on the ratio of total economic activity to basic economic activity. Basic, in this context, is defined as the production or employment engaged to supply goods and services outside the ROI or by federal activities (such as military installations and their employees). According to economic base theory, the ratio of total income to basic income is measurable (as the multiplier) and sufficiently stable so that future changes in economic activity can be forecast. This technique is especially appropriate for estimating aggregate impacts and makes the economic base model ideal for the EA and EIS process.

The multiplier is interpreted as the total impact on the economy of the region resulting from a unit change in its base sector; for example, a dollar increase in local expenditures due to an expansion of its military installation. EIFS estimates its multipliers using a location quotient approach based on the concentration of industries within the region relative to the industrial concentrations for the nation.

The user inputs into the model the data elements which describe the Army action: the change in expenditures, or dollar volume of the construction project(s); change in civilian or military employment; average annual income of affected civilian or military employees; the percent of civilians expected to relocate due to the Army's action; and the percent of military living on-post. Once these are entered into the EIFS model, a projection of changes in the local economy is provided. These are projected changes in sales volume, income, employment, and population. These four indicator variables are used to measure and evaluate socioeconomic impacts. Sales volume is the direct and indirect change in local business activity and sales (total retail and wholesale trade sales, total selected service receipts, and value-added by manufacturing). Employment is the total change in local employment due to the Proposed Action, including not only the direct and secondary changes in local employment, but also those personnel who are initially affected by the military action. Income is the total change in local wages and salaries due to the Proposed Action, which includes the sum of the direct and indirect wages and salaries,

plus the income of the civilian and military personnel affected by the Proposed Action. Population is the increase or decrease in the local population as a result of the Proposed Action.

THE SIGNIFICANCE OF SOCIOECONOMIC IMPACTS

Once model projections are obtained, the Rational Threshold Value (RTV) profile allows the user to evaluate the significance of the impacts. This analytical tool reviews the historical trends for the defined region and develops measures of local historical fluctuations in sales volume, income, employment, and population. These evaluations identify the positive and negative changes within which a project can affect the local economy without creating a significant impact. The greatest historical changes define the boundaries that provide a basis for comparing an action’s impact on the historical fluctuation in a particular area. Specifically, EIFS sets the boundaries by multiplying the maximum historical deviation of the following variables

Table C-1: Historical Deviation Variables

		Increase	Decrease
Sales Volume	X	100%	75%
Income	X	100%	67%
Employment	X	100%	67%
Population	X	100%	50%

These boundaries determine the amount of change that will affect an area. The percentage allowances are arbitrary, but sensible. The maximum positive historical fluctuation is allowed with expansion because economic growth is beneficial. While cases of damaging economic growth have been cited, and although the zero-growth concept is being accepted by many local planning groups, military base reductions and closures generally are more injurious to local economics than are expansion.

The major strengths of the RTV are its specificity to the region under analysis and its basis on actual historical data for the region. The EIFS impact model, in combination with the RTV, has proven successful in addressing perceived socioeconomic impacts. The EIFS model and the

RTV technique for measuring the intensity of impacts have been reviewed by economic experts and have been deemed theoretically sound.

The following are the EIFS inputs and output data and the RTVs for the ROI. These data form the basis for the socioeconomic impact analysis presented in Section 4.10.

Summary of Assumptions

For purposes of running the EIFS model, the peak year for incoming personnel and the peak year for construction spending were selected to determine the maximum impact that Proposed Actions could have on the regional economy. For this action, no civilian personnel would re-locate within the ROI. Therefore, only construction costs were used to determine the impact of the Proposed Action. The project costs are assumed to be \$5,000,000. These costs were obtained through communication with the USACE personnel, regarding the construction costs of any renovation and upgrades for the reuse of the facility. The impacts from project spending are shown in Tables C-2 through C-4. Table C-2 shows input to the model, C-3 shows resultant sales, income, and employment generated for the economy and the percent annual fluctuation it represents, and Table C-4 shows the annual fluctuations in RTV for the ROI above or below which the action would be considered significant.

Table C-2: Forecast Input for the EIFS Model

EIFS Report Bristol County, RI – Forecast Input	
Change In Local Expenditures	\$5,000,000
Change In Civilian Employment	16
Average Income of Affected Civilian	\$55024
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	0
Percent of Military Living On-base	0
Employment Multiplier	2.82
Income Multiplier	2.82

Table C-3: EIFS Report for Bristol, RI – Forecast Output

Forecast Output		
Employment Multiplier	2.82	
Income Multiplier	2.82	
Sales Volume – Direct	\$3,934,779	
Sales Volume – Induced	\$7,161,298	
Sales Volume – Total	\$11,096,080	0.06%
Income – Direct	\$1,406,067	
Income - Induced	\$1,166,604	
Income – Total (place of work)	\$2,572,672	0.02%
Employment – Direct	33	
Employment – Induced	30	
Employment – Total	63	0.02%
Local Population	0	
Local Off-base Population	0	0%

Table C-4: EIFS Report for Bristol County, RI – RTV Summary

RTV Summary				
	Sales Volume	Income	Employment	Population
Positive RTV	11.28%	9.92%	8.08%	2.96%
Negative RTV	-18.33%	-8.69%	-12.42%	-3.07%

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APPENDIX D: AIR QUALITY ANALYSIS

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An analysis was conducted to identify potential increases or decreases in criteria air pollutant emissions associated with the proposed Base Realignment and Closure activities at the David P. Oswald U.S. Army Reserve Center (USARC) in Everett, Washington. The project would occur within Snohomish County, Washington. The U.S. Environmental Protection Agency (USEPA) designated the area as in attainment for all criteria air pollutants and is not subject to the federal conformity requirements. The purpose of this analysis is to analyze the impact of the proposed reuse on air quality.

The federal conformity rules were established to ensure that federal activities do not hamper local efforts to control air pollution. In particular, Section 176(c) of the Clean Air Act (CAA) prohibits federal agencies, departments, or instrumentalities from engaging in, supporting, licensing, or approving any action in an area that is in nonattainment or maintenance of the National Ambient Air Quality Standards (NAAQS), which does not conform to an approved state or federal implementation plan.

1.0 Project Description

The proposed action is to close the Oswald USARC for reuse by the Snohomish County Domestic Violence Services (DVS). The DVS would reuse the existing structures at Oswald to shelter victims of domestic violence and their children. It would also provide a service center for 24-hour crisis line, support group, and advocacy services. The facilities would be remodeled as an emergency shelter for victims of domestic violence, administrative offices for staff that provide support for the victims of domestic violence, and a daycare for children of residents of the emergency shelter.

- **Phase I – Main Administrative Building:** The existing administration building would be remodeled to house the agency’s non-shelter services, including group meeting rooms, a flexible multi-purpose room, separate rooms for staff to interview and counsel domestic violence victims, and staff offices. The building would also shelter support functions such as laundry facilities, storage, and a computer server room. Because military building standards do not necessarily coincide with local or state building codes, reuse of the buildings would require some renovations prior to receiving approval for use by the local Building Official and the Fire Marshall. Renovations to accommodate the future reuses and to meet appropriate building codes may include the following:
 - Removal of existing walls;
 - Building new walls;
 - Window enlargements.

- **Phase I – Attached Gymnasium and Kitchen:** Attached to the main administrative building is a gymnasium and complete commercial kitchen. This structure would be turned into a 60-bed domestic violence shelter. Along with the kitchen facilities, the first floor would act as the “living room” for a children’s play area, TV viewing, eating space, group activities, and sleeping rooms for mobility impaired clients. Each sleeping room would have its own toilet and sink with shared tub/shower. Another option would be to construct a new shelter structure to the north or south of the gymnasium. This depends on city regulations, including the City’s Consolidated Plan, permitting the constructions. Renovations to accommodate the future reuses and to meet appropriate building codes may include the following:
 - A second floor would be added to the gymnasium. The roof would not need to be raised and would include interior renovations only.

- The addition of 2,000 square feet in the gymnasium for additional handicapped sleeping rooms and shelter staff offices.
- Phase II – Day Care Center, Vehicle Maintenance Facility: DVS proposes to remodel the OMS for use as a child care facility. In the short term, the facility would be used for storage. All renovations would be on the interior of the structure.
- Phase III – Transitional Housing: If the Everett City Council amends the Consolidated Housing Plan to allow new construction of publicly subsidized housing on the Oswald USARC property, DVS would eventually like to construct a 20-unit facility to provide transitional housing. If approved, construction of the transitional housing would start approximately 36 months after DVS came into possession of the property and construction would last for 12 months. The construction would be located on the southern portion of the property along the 12th Street boundary. For the purposes of this analysis, it is assumed the 20-unit housing complex would be approximately 30,000 square feet (1,000 square feet per unit with additional space for hallways, entryway and associated spaces).

For a conservative analysis, it was assumed that all construction would occur within a one year-time frame.

2.0 Meteorology/Climate

Temperature is a parameter used in calculations of emissions for air quality applicability. Oswald USARC is located in Everett, Washington, which is in Snohomish County. Snohomish County maintains a moderate climate year-round, with average temperature of 51 degrees Fahrenheit (The Weather Channel, nd).

3.0 Current Ambient Air Quality Conditions

The USEPA defines ambient air in 40 CFR Part 50 as “that portion of the atmosphere, external to buildings, to which the general public has access.” In compliance with the 1970 Clean Air Act (CAA) and the 1977 and 1990 Clean Air Act Amendments (CAAA), the USEPA has promulgated National Ambient Air Quality Standards (NAAQS). The NAAQS were enacted for the protection of the public health and welfare, allowing for an adequate margin of safety. To date, the USEPA has issued NAAQS for the following criteria pollutants: carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (particles with a diameter less than or equal to a nominal 10 micrometers (PM₁₀) and particles with a diameter less than or equal to nominal 2.5 micrometers (PM_{2.5})), ozone (O₃), nitrogen dioxide (NO₂), and lead (Pb).

Federal regulations designate Air Quality Control Regions (AQCRs) in violation of the NAAQS as nonattainment areas. According to the severity of the pollution problem, nonattainment areas can be categorized as marginal, moderate, serious, severe, or extreme. Severity categories have not been applied to PM_{2.5} nonattainment areas. The USEPA has classified Snohomish County, which includes the Oswald USARC, as in attainment for all criteria pollutants.

The NAAQS for all criteria pollutants are shown in Table D-1.

Table D-1: State and Federal Ambient Standards for Criteria Air Pollutants

Pollutant	Averaging Period	Federal Primary Standard	Washington State Standard
Ozone	8-hour	0.075 ppm	Same as Federal
	1-hour (daily max.)	0.12 ppm	Same as Federal
PM_{2.5}	Annual (arithmetic mean)	15.0 µg/m ³	Same as Federal
	24-hour	35 µg/m ³	Same as Federal
PM₁₀	Annual (arithmetic mean)	NA	50 µg/m ³
	24-hour	150 µg/m ³	150 µg/m ³
Carbon Monoxide	8-hour	9 ppm	9 ppm
	1-hour	35 ppm	35 ppm
Nitrogen Dioxide	Annual (arithmetic mean)	0.053 ppm	0.05 ppm
	1-hour	0.100 ppm	Same as Federal
Sulfur Dioxide	Annual (arithmetic mean)	0.03 ppm	0.02 ppm
	24-hour	0.14 ppm	0.10 ppm
	1-hour (per annum)	NA	0.40 ppm
	1-hour (per 7 days)	NA	0.25 ppm
	5-minute	NA	0.80 ppm
Lead	Rolling 3-month average	0.15 µg/m ³	Same as Federal
	Quarterly average	1.5 µg/m ³	Same as Federal
Total Suspended Particulate	Annual (geometric mean)	NA	60 µg/m ³
	24-hour	NA	150 µg/m ³

Sources: USEPA, 2011; WADOE, 2011.

ppm = parts per million

µg/m³ = micrograms per cubic meter

4.0 Air Quality Regulatory Requirements: General Conformity Applicability Analysis

To regulate the emission levels resulting from a project, federal actions located in nonattainment areas are required to demonstrate compliance with the general conformity rule established in 40 CFR Part 93 Determining Conformity of Federal Actions to State or Federal Implementation Plans (the Rule). The project area is located within an attainment area therefore, a General Conformity Rule applicability analysis is not warranted.

In order to analyze the significance of impacts to air quality, however, this analysis will refer to Section 93.153 of the Rule, which sets applicability requirements for projects subject to the Rule through establishment of *de minimis* levels for annual criteria pollutant emissions. These *de minimis* levels are set according to criteria pollutant nonattainment or maintenance area designations. For projects below the *de minimis* levels, a full conformity determination is not required. Those at or above the levels are required to perform a conformity determination as established in the Rule. The *de minimis* levels apply to emissions that can occur during the construction and operation phases of the action.

For ozone, emissions have been estimated for the ozone precursor pollutants NO_x and volatile organic compounds (VOCs). Annual emissions for these compounds were estimated for each of the project actions (construction and operations) to determine if they would be below or above the *de minimis* levels established in the Rule. The *de minimis* threshold is 100 tons per year (TPY) for NO_x and VOCs. The *de minimis* threshold for all other criteria pollutants is 100 TPY, with the exception of lead, which is 25 TPY. There would be no lead emissions from on-road vehicles because those vehicles use unleaded fuel. The amount of lead emitted from construction equipment and heating sources was negligible and did not yield emissions above one thousandth of a ton (0.000) and was not included in this report.

Sources of NO_x, VOCs, PM_{2.5}, PM₁₀, CO, and SO₂ associated with the proposed project would include emissions from construction equipment and painting of building surfaces (VOCs only), and emissions from stationary units (boilers), and the change in daily commuters at the site.

5.0 Air Quality Impact Analysis

A project construction- and operations-related impact analysis was performed for the proposed reuse.

5.1 Construction Emissions

Construction emissions would result from the operation of heavy equipment and delivery trucks and the painting of the building structures. The project would utilize a mix of heavy equipment for construction.

5.1.1 Emission Factors For Heavy Equipment

Annual emissions were calculated for various types of diesel construction vehicles using model emission rate input for conditions in July 2012 in USEPA's *Nonroad 2008a Emission Inventory Model: Diesel Construction Equipment, Snohomish County, Washington* (USEPA, 2008). Truck emission levels were calculated using USEPA's *MOBILE6.2* model for conditions in July 2012 (USEPA, 2009). The total annual emissions in TPY were determined for each vehicle type based on the number of operating hours per year per vehicle type.

It was assumed that delivery trucks would travel 20 miles per trip, making one trip per day, averaging 30 miles per hour.

Dump truck calculations are based on the estimated number of total annual miles needed, primarily for materials from interior renovation, with a round trip haul of 22 miles averaging 30 miles per hour. This estimate assumes a 14-ton capacity dump truck.

Emissions factors used for construction vehicles, under all alternatives, are shown in Table D-2.

TABLE D-2: EMISSIONS FACTORS FOR CONSTRUCTION VEHICLES

Construction Vehicle Type	Emissions Factors (lbs/hr per vehicle)					
	NO _x	VOC	PM _{2.5}	PM ₁₀	SO ₂	CO
Front End Loader	1.271	0.099	0.092	0.094	0.043	0.416
Excavator	1.073	0.086	0.087	0.089	0.043	0.379
Dozer	1.346	0.107	0.103	0.106	0.050	0.456
Vibratory Roller	0.993	0.081	0.090	0.093	0.032	0.389
Grader	1.119	0.092	0.112	0.115	0.040	0.046
Concrete Pumper Truck	2.992	0.237	0.160	0.165	0.061	0.850
Concrete Truck (mixing)	5.079	0.350	0.239	0.246	0.103	1.552
Concrete Truck (travel)*	4.472	0.356	0.126	N/A	0.013	1.261
Crane	1.856	0.137	0.097	0.100	0.059	0.391
Backhoe	1.264	0.279	0.230	0.237	0.032	1.549
Dump Truck*	4.472	0.356	0.126	N/A	0.013	1.261
Delivery Truck (Medium)*	1.68	1.242	0.011	N/A	0.009	9.050
Delivery Truck (Heavy)*	4.472	0.356	0.126	N/A	0.013	1.261

* Units are in grams/mile.
N/A – MOBILE 6.2 provides PM emissions as “Total PM” and does not break out by PM_{2.5} and PM₁₀. For the purposes of this analysis, emissions are expressed at PM_{2.5}

5.1.2 Sample Calculations for Construction Emissions

Using the assumptions described above, the emissions in tons of NO_x, VOC, PM_{2.5}, PM₁₀ (where applicable), CO, and SO₂ for construction equipment and vehicle emissions were calculated for each vehicle type using the appropriate emission rates from Table D-2 and equations displayed in Table D-3.

TABLE D-3: EQUATIONS FOR CONSTRUCTION EMISSIONS CALCULATIONS

Emission Source	Equation	Sample Calculation
Heavy Equipment Emissions, Hourly On-Site Activities	(Equipment Type) (Emission Factor) (Total # of days in operation) (hours/day) (1 ton/2000 lbs) = tons of air emissions	(1 grader) (1.119 lbs/hr) (2.4 days in operation) (8 hours/day) (1 ton/2000 lbs) = 0.011 tons of NO_x of equipment emissions
Construction Truck Emissions with Vehicle-miles	(# vehicle type) (Emission Factor) (Total # of miles traveled during a specific construction activity) (1 lb/453.59 grams) (1 ton/2000 lbs) = tons of air emissions	(1 dump truck) (4.472 grams/mile) (200 miles total during construction)(1 lb/453.59 grams) (1 ton/2000 lb) = 0.002 tons NO_x of vehicle emissions

5.1.4 Resultant Heavy Equipment Emissions for the Preferred Alternative

Equipment requirements were estimated for the construction activities associated with site preparation for buildings and trenching for utilities. Table D-5 provides the equipment assumptions and resultant total equipment emissions for the preferred alternative.

TABLE D-5: TOTAL EQUIPMENT EMISSIONS FOR CONSTRUCTION

Construction Vehicle Type	Equip / Vehicle Days	Annual Emissions (TPY)					
		NO _x	VOC	PM _{2.5}	PM ₁₀	SO ₂	CO
Front End Loader	5	0.026	0.002	0.002	0.002	0.001	0.008
Excavator	3	0.011	0.001	0.001	0.001	0.000	0.004
Dozer	4	0.019	0.002	0.001	0.001	0.001	0.006
Vibratory Roller	2	0.010	0.001	0.001	0.001	0.000	0.004
Grader	2.4	0.011	0.001	0.001	0.001	0.000	0.000
Concrete Pumper Truck	60	0.718	0.057	0.038	0.040	0.015	0.204
Concrete Truck (mixing)	60	1.219	0.084	0.057	0.059	0.025	0.372
Concrete Truck* (travel)	120	0.035	0.003	0.001	0.000	0.000	0.000
Crane	150	1.114	0.082	0.058	0.060	0.036	0.234
Backhoe	2	0.010	0.002	0.002	0.002	0.000	0.012
Dump Truck*	200	0.002	0.000	0.000	0.000	0.000	0.000
Delivery Truck (Med)*	4,800	0.009	0.007	0.000	0.000	0.000	0.000
Delivery Truck (Heavy)*	4,800	0.024	0.002	0.001	0.000	0.000	0.000
Total Emissions		3.207	0.243	0.164	0.167	0.078	0.846

* Units are in total miles.

5.1.5 Emissions from Painting Activities

For painting building structures, it was assumed that water-based latex paint would be used with a VOCs content of 0.5 pound per gallon and one gallon of paint covers approximately 300 square feet. Three coats of flat paint would be applied (one primer and two finish) to approximately 200,000 square feet of interior surfaces, based on a wall to floor ratio of 3:1 for painted surfaces and the assumption that all interior spaces would be repainted. Based on these specifications, approximately 2,000 gallons of flat paint are needed for interior construction. Total interior painting for buildings creates approximate VOCs emissions of 0.500 tons.

Little to no exterior painting is anticipated as the finish will be precast concrete or brick, windows, doors, and door frames will be finished at the manufacturer's factory.

5.1.6 Summary of Construction Emissions

After emissions analysis was performed for all aspects of construction, the totals were added to determine the combined annual construction emissions. Table D-6 summarizes the results.

TABLE D-6: EMISSIONS FROM CONSTRUCTION

Construction Activity	Total Annual Emissions (TPY)					
	NO _x	VOC	PM _{2.5}	PM10	SO ₂	CO
Construction Equipment	3.207	0.243	0.164	0.167	0.078	0.846
Painting (VOC only)		0.500				
Total Emissions from Construction	3.207	0.743	0.164	0.167	0.078	0.846

5.2 Operations Emissions

Operations emissions are from heating sources and new commuters associated with the Preferred Alternative.

5.2.1 Heating Source Emissions

Heating source emissions were analyzed based on the change in use from a reserve center to office and residential space in addition to the new building space. Operational heating requirements for the EA analysis are based on the most recent Commercial Buildings Energy Consumption Survey (CBECS) in 2003 conducted by the Department of Energy, Energy Information Administration. Table C30 from this document indicates that the average energy intensity for buildings using natural gas in climate zone 2, which includes Snohomish County, WA, (DOE, 2003). The average intensity for office space, the category operation of the USARC would most accurately fall into, in zone 2 is 41.1 standard cubic feet of natural gas per square foot (SCF/SF) annually. The average intensity for lodging, as assumed for the DVS, is 72.8 SCF/SF.

The following natural gas emission rates are assumed based on the USEPA's *AP-42 Fifth Edition, Compilation of Air Pollution Emission Factors Volume I, Chapter 1: Stationary Sources, Supplement D* (USEPA, 1998):

- NO_x = 100 lb NO_x /10⁶ CF natural gas
- VOC = 5.5 lb/10⁶ CF natural gas
- PM_{2.5} = 7.6 lb/10⁶ CF natural gas (analyzed as PM_{2.5} and PM₁₀ combined)
- SO₂ = 0.6 lb/10⁶ CF natural gas
- CO = 84 lb/10⁶ CF natural gas

Table D-7 shows resultant annual emissions from space heating.

TABLE D-7: TOTAL ANNUAL EMISSIONS FROM HEATING

Heating	Total Annual Emissions (TPY)				
	NO _x	VOC	PM _{2.5}	SO ₂	CO
DVS (existing and new space)	0.161	0.009	0.012	0.001	0.135
Minus existing USARC heating	-0.029	-0.002	-0.002	-0.000	-0.024
Resultant Annual Emissions	0.132	0.007	0.010	0.001	0.111

5.2.2 Vehicle Emissions from Daily Commuters

Vehicle emissions from commuter vehicles, assuming 25 new employee commuters and 28 daily visitors to the DVS, are based on the *MOBILE6.2* air modeling program, estimating the emissions per vehicle per mile traveled. The *MOBILE6.2* modeling program takes into account the vehicle age, average speed, and vehicle type (passenger car) to create average emission factors to be used in an overall analysis. The analysis assumed that the average speed is 30 miles per hour and emission rates for each of the pollutants in July 2012. Based on these assumptions, the emissions factors for NO_x, VOC, PM_{2.5}, SO₂, and CO from average vehicles are provided in Table D-8.

TABLE D-8: EMISSION FACTORS FOR COMMUTER VEHICLES

	Pollutant				
	NO _x	VOC	PM _{2.5}	SO ₂	CO
Emissions Factor (grams/mile/vehicle)	0.61900	0.8890	0.0078	0.0114	13.6800

The analysis takes into account that the DVS commuters would be replacing 9 daily commuters and 66 weekend reservists associated with the USARC. For the reservists, it was assumed they would travel one weekend a month (24 trips a year) to the USARC and could travel from up to 50 miles away, or 100 miles round trip. Daily commuters for both the USARC and DVS, as well as daily visitors to the DVS, were assumed to travel 40 miles round trip daily. Commuters would travel 240 days a year while visitors to the DVS would travel 365 days a year. The annual emissions in tons per year of NO_x, VOC, PM_{2.5}, CO, and SO₂ for vehicle emissions during operations were calculated using the appropriate equations displayed in Table D-9.

TABLE D-9: EQUATIONS FOR OPERATIONS EMISSIONS CALCULATIONS

Emission Source	Equation	Sample Calculation
Operations, Commuters	$\begin{aligned} &(\# \text{ of vehicles}) (\# \text{ of trips/day}) (\# \text{ miles/trip}) \\ &(\# \text{ days/year}) = \# \text{ miles/year} \\ &(\# \text{ miles/year}) (\text{emissions factor grams/mile}) (1 \\ &\text{ lb/453.59 grams}) (1 \text{ ton/2000 lb}) = \text{TPY of Vehicle} \\ &\text{Emissions} \end{aligned}$	$\begin{aligned} &(25 \text{ vehicles}) (2 \text{ trips/day}) (20 \text{ miles/trip}) \\ &(240 \text{ days/year}) (0.619 \text{ g/mile/vehicle}) (1 \\ &\text{ lb/453.59 grams}) (1 \text{ ton/2000 lbs}) = \mathbf{0.164} \\ &\mathbf{TPY \text{ NO}_x \text{ from DVS employees}} \end{aligned}$

TABLE D-10: ANNUAL EMISSIONS FROM VEHICLE TRAFFIC

Source	Number of Commuters	Total Annual Emissions (TPY)				
		NO _x	VOC	PM _{2.5}	SO ₂	CO
DVS Employees	25	0.164	0.362	0.003	0.002	3.619
DVS Visitors	28	0.279	0.616	0.005	0.004	6.165
USARC Employees	9	-0.059	-0.085	-0.0007	-0.001	-1.302

Reservists	66	-0.108	-0.239	-0.001	-0.001	-2.388
TOTAL		0.276	0.655	0.003	0.005	6.092

5.2.3 Summary of Annual Operations Emissions

Annual operations emissions include emissions from heating the building space and water and emissions from daily employee traffic. There will not be an emergency generator. Table D-11 provides the total annual operations emissions.

TABLE D-11: ANNUAL EMISSIONS FROM OPERATIONS

Operations Activity	Total Annual Emissions –TPY				
	NO _x	VOC	PM _{2.5}	SO ₂	CO
Heating	0.132	0.007	0.010	0.001	0.111
Commuter Traffic	0.276	0.655	0.003	0.005	6.092
Total Emissions from Operations	0.408	0.662	0.013	0.006	6.203

5.3 Combined Construction and Operations Emissions

The emissions from construction and operations would likely occur in different years not combine on an annual basis, however for a conservative analysis, both construction emissions and operation emissions have been combined. Table D-12 shows the maximum annual emissions expected from the preferred alternative. When these emission estimates are compared to the *de minimis* values, they all fall well below the *de minimis* values.

TABLE D-12: TOTAL ANNUAL EMISSIONS

Activity	Total Annual Emissions (TPY)					
	NO _x	VOC	PM _{2.5}	PM ₁₀	SO ₂	CO
<i>de minimis</i> levels	100	100	100	100	100	100
Construction	3.207	0.743	0.164	0.167	0.078	0.846
Full Operation	0.408	0.662	0.013	N/A	0.006	6.203
TOTAL COMBINED	3.615	1.405	0.177	0.167	0.084	7.049

5.5 Conclusion

As the annual emissions are well below *de minimis* levels and a full conformity determination is not required. A draft Record of Non-Applicability (RONA) can be found in Attachment One to Appendix D.

6.0 References

Department of Energy

2003 Commercial Building Energy Consumption Survey.

State of Washington, Department of Ecology, Air Quality Program.

2010 *Ambient Air Quality Standards in Washington State*. Updated: April, 2010. Accessed on March 8, 2011 at:
http://www.ecy.wa.gov/programs/air/Nonattainment/WA_Std_April2010.pdf.

U.S. Army Corps of Engineers, Mobile District
 Environmental Assessment – Oswald USARC, Everett, WA
 December 2011

Appendix D
 Air Quality Analysis
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United States Environmental Protection Agency (U.S. EPA)

- 1998 Compilation of Air Pollutant Emission Factors, Volume I, Chapter 1 Supplement D: Stationary Sources, AP-42, 5th edition. 1998.
- 2008 Nonroad2008a Emission Inventory Model: Diesel Construction Equipment and Trucks, Montgomery County, Maryland. Model Run Dec 09.
- 2009 *MOBILE6.2* Mobile Source Emission Factor Model, for 2010 and 2011 Vehicle Emissions. Model Run Dec 2011.
- 2011 *National Ambient Air Quality Standards*. Accessed on March 8, 2011 at: <http://www.epa.gov/ttn/naaqs/>.

Weather Channel

- 2011 Monthly Averages for Everett, Washington. Accessed March 29, 2011 from <http://www.weather.com/weather/wxclimatology/monthly/graph/USWA0140>.

ATTACHMENT ONE: RECORD OF NON-APPLICABILITY

GENERAL CONFORMITY – RECORD OF NON-APPLICABILITY

Project/Action

Name: Implementation of BRAC 05 Realignment at Oswald U.S. Army Reserve Center, Everett, WA

Project/Action

Point of Contact: David L. Moore
Environmental Division Chief
88th Regional Support Command
Fort McCoy, Wisconsin
608.388.0366

General Conformity under the Clean Air Act, Section 176 has been evaluated for the project described above according to the requirements of 40 CFR 93, Subpart B. The General Conformity Rule applies to federal actions occurring in regions designated as being in non-attainment for the National Ambient Air Quality Standards (NAAQS) or attainment areas subject to maintenance plans (maintenance areas). Threshold (*de minimis*) rates of emissions have been established for federal actions with the potential to have significant air quality impacts. If a project/action located in an area designated as non-attainment exceeds these *de minimis* levels, a general conformity analysis is required.

A General Conformity Analysis of this project/action is not required because:

Snohomish County is in attainment for all criteria pollutants and therefore these pollutants are not subject to conformity review.

Supporting documentation and emissions estimates:

- Are Attached
- Appear in the NEPA Documentation
- Other (Not Necessary)



DAVID L. MOORE
Environmental Division Chief
88th Regional Support Command

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