

Fort Wainwright

Disposition of Hangars 2 & 3

RECORD OF DECISION

FORT WAINWRIGHT, ALASKA

MARCH 2014



Record of Decision for the Disposition of Hangars 2 and 3 at Fort Wainwright, Alaska

Executive Summary

As the Garrison Commander for the United States (U.S.) Army Garrison Fort Wainwright Alaska (USAG FWA), I have reviewed the Final Environmental Impact Statement (EIS)¹ for the Disposition of Hangars 2 and 3 at Fort Wainwright, Alaska. The Final EIS adequately evaluates the potential environmental effects associated with the proposed disposition of two historic World War II-era hangars, Hangars 2 and 3, at Fort Wainwright, Alaska. The Final EIS, published in January 2014, is incorporated by reference in this Record of Decision (ROD).

The ROD explains that the U.S. Army (Army) will proceed with implementing its preferred alternative (Alternative 1, Demolition of Hangars 2 and 3). This alternative will involve removal of the hangars and their supporting infrastructure, located on the Main Post of Fort Wainwright, Alaska. Both buildings have been found to be unsafe for occupancy and have no remaining military purpose. This decision provides the proper balance of technical and economic feasibility, environmental and social issues, and the ability to meet Army mission objectives, while eliminating the safety hazard presented by Hangars 2 and 3.

1.0 BACKGROUND

Hangars 2 and 3 are contributing resources to the Ladd Field National Historic Landmark (Ladd Field NHL) and the Ladd Air Force Base Cold War Historic District (Cold War Historic District) on Fort Wainwright, Alaska. Constructed between 1943 and 1944 as semi-permanent structures, these hangars have received varying degrees of operational maintenance over the years, but no large-scale rehabilitation has occurred. To accommodate changing missions, the Army completed numerous interior modifications to the hangars, including creating doorways and windows and altering the interior lateral cross-bracing. The lack of a large-scale rehabilitation and the numerous interior modifications, along with the age of the structures, a fire in Hangar 2 in early 2011, and the harsh Alaskan environment, have contributed to the compromised structural integrity of both hangars. The USAG

¹ Because public and agency comments received on the Draft EIS during the public comment period for the Draft EIS did not result in the modification of any of the alternatives or the environmental analysis in the Draft EIS, as allowed for in 40 Code of Federal Regulations [CFR] §1503.4 and 32 CFR §651.45 (h), an *Erratum to the Draft Environmental Impact Statement* was prepared. That document in conjunction with the Draft EIS is what constitutes the Final EIS for the Disposition of Hangars 2 and 3 at Fort Wainwright, Alaska.

FWA condemned the buildings in 2011, and they are no longer used because of the safety hazard they present.

The Final EIS evaluates the environmental effects of the Army's proposal to determine a disposition for Hangars 2 and 3 that will resolve safety and fiscal concerns and land use issues and comply with statutory requirements. Determination of their disposition is needed to resolve the hangars' inability to meet the functional requirements as maintenance facilities for modern aircraft, to resolve their current condemned status that prevents them from serving an active military function at Fort Wainwright, and to resolve the safety hazard they present due to their compromised structural integrity. Additionally, through the winter of 2012 the hangars continued to be heated in the winter months to help prevent snow buildup on the roofs which, if left to accumulate, could collapse the structures. Maintaining the minimum heating (to avoid roof collapse and frozen pipes), electrical (to maintain indoor and outdoor lighting, fire suppression systems, pump mechanisms and equipment failure notifications), and water (to ensure fire suppression) requirements created annual utility costs for these unoccupied facilities of approximately \$350,000 per hangar. Contributing to these high utility costs was the fact that these hangars were not originally constructed with energy efficiency as a primary goal, and these high utility costs diverted operation and maintenance funds that could have been used for other priority projects on Fort Wainwright.

During the publication phase of the Final EIS, and after the document was signed by the Acting Garrison Commander, the USAG FWA was made aware of issues with the electrical and heating systems in Hangars 2 and 3. In late fall 2013 as winter approached, the Directorate of Public Works (DPW) began their annual maintenance on Hangars 2 and 3 to prepare them for the winter months (e.g. bring the heating systems back online). During these activities, it was discovered that much of the mechanical equipment for the heating system in Hangar 3 had failed or was failing. Based on the unsafe working conditions in and around the hangar, which is condemned, unoccupied, and continuing to deteriorate, as well as cost considerations, the decision was made not to repair or replace the mechanical equipment. The mechanical equipment for the heating system in Hangar 2 was discovered to be in even worse condition than in Hangar 3. It was also discovered that Doyon Utilities (the current utility provider for the installation) had not reconnected Hangar 2 to the power grid after moving utility poles outside of the building in the summer of 2013. The utility poles were moved at the request of the USAG FWA as part of a military construction project to widen Montgomery Road, which runs in front of the hangars. Upon discovery of the failed systems and the lack of electricity to power the equipment,

the USAG FWA made the decision to not reconnect Hangar 2 to the power grid or repair/replace the mechanical equipment for reasons similar to Hangar 3. With no heat currently being provided to Hangars 2 or 3 to help prevent snow buildup on the roofs, the potential for an uncontrolled collapse of the hangars due to snow load has increased.

The Final EIS and this ROD have been prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA) (42 United States Code [USC] §4321 et seq.); the Council on Environmental Quality (CEQ) regulations that implement NEPA (40 Code of Federal Regulations [CFR] §§1500-1508); and the Army's NEPA-implementing regulation (32 CFR §651, *Environmental Analysis of Army Actions*). Additionally, because the hangars are contributing resources within the Ladd Field NHL and Cold War Historic District, the proposal to determine and implement a new disposition for Hangars 2 and 3 was considered an undertaking under the National Historic Preservation Act (NHPA) and required Section 106 consultation procedures of the NHPA to be followed.

Given the new information concerning the failure of the electrical and heating systems in the hangars, the Army analyzed this change with regards to whether the Final EIS should be supplemented in accordance with 32 CFR §651.45(l). This section states that "If there are substantial changes in the proposed action, or significant new information relevant to environmental concerns during the proposed action's planning process, the proponent will prepare revisions or a supplement to any environmental document or prepare new documentation as necessary." The failure of the electrical and heating systems in the hangars is not a substantial change in the proposed action or significant new information relevant to environmental concerns. In the Final EIS, the description and analysis of the No Action Alternative (Alternative 2) notes that as large structural systems fail they will not be replaced or receive major repairs and that this could contribute to an eventual uncontrolled collapse of the hangars. Because the failure of major systems in the hangars is already considered and analyzed in the Final EIS, supplementation of the Final EIS is not required.

2.0 PROPOSED ACTION

The USAG FWA proposes to determine and implement a disposition for Hangars 2 and 3 and supporting infrastructure located at Fort Wainwright, Alaska. Actions will be taken to avoid, minimize, or otherwise mitigate any adverse effects on historic properties.

3.0 ALTERNATIVES

The USAG FWA developed a screening process to evaluate reasonable alternatives and determine their ability to satisfy the purpose and need of the Proposed Action. The screening criteria for alternatives included 1) the action must directly address the disposition of Hangars 2 and 3, 2) the action must be compatible with the current and future military mission at Fort Wainwright, 3) the action must not be prohibitively expensive, and 4) the action must have a reasonably foreseeable funding source, or a mechanism for obtaining applicable and timely funding to pay for life, health, and safety upgrades or demolition actions. In order for an alternative to be considered reasonable for further analysis, it had to meet all four screening criteria. After conducting a viability analysis of a range of alternatives based on the screening criteria, USAG FWA determined that there was only one viable action alternative: demolition of Hangars 2 and 3 and conversion of the demolition footprint along the airfield to concrete apron. This, along with the No Action Alternative was carried forward for analysis in the EIS.

These two alternatives for implementing the Proposed Action are discussed in Chapter 2.0 of the Final EIS and are summarized here.

3.1 Alternative 1: Demolition of Hangars 2 and 3 (Preferred Alternative)

Under this alternative, Hangars 2 and 3 and their supporting infrastructure will be demolished beginning in spring 2014. Demolition will involve removal of the hangars, totaling 24,016 cubic yards of non-hazardous debris; demolition of existing and abandoned utilities not belonging to Doyon Utilities (the current utility provider for the installation), totaling approximately 2,680 linear feet; demolition of existing privately owned vehicle parking areas, lighting, head bolt outlets, and power source, encompassing an area of approximately 3.3 acres; and demolition of the concrete building slabs and foundations within 5 feet of the building, to a depth of 8 inches, totaling approximately 2,075 cubic yards of debris. In addition, a small (200-square-foot), open, flammable liquids storage facility located between Hangars 2 and 3, which is currently empty, will be demolished, totaling approximately 91 cubic yards of debris. Prior to demolition, the Army will conduct hazardous material surveys of the buildings and their supporting infrastructure, including surveys for soil contamination. The Army will remove and dispose of any hazardous materials found. Asbestos-containing building materials (ACBM) will be disposed of in the Fort Wainwright landfill, while all other hazardous materials will be disposed of off-post in the Fairbanks North Star Borough (FNSB) landfill in accordance with applicable federal and state regulations. Non-hazardous demolition debris will be disposed of in the FNSB landfill;

however, the Army will divert (i.e., salvage, recycle, or reuse) non-hazardous materials from being placed in the landfill to the maximum extent practicable.

Once demolition of the hangars is complete, concrete will be added to the building and infrastructure footprints to maintain consistency with the adjacent airfield, which is designated as an aircraft parking apron. The Army will construct two asphalt access roads to the new apron to facilitate travel by emergency and maintenance vehicles. Infiltration areas, swales, and culverts for stormwater will be installed as needed, to include the addition of topsoil and seeding. Security fencing, compatible with existing design, will also be installed. The total area encompassed by this project is approximately 10 acres. Any future construction on this site is currently unknown and is beyond the scope of the EIS. If future construction does occur, it would be the subject of separate NEPA documentation.

3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, demolition of Hangars 2 and 3 would not occur. While remaining intact, the hangars would continue to not meet the functional requirements of maintenance facilities for aircraft and would serve no active military function. The hangars would remain vacant because they have been found to be unsafe for occupancy. Maintenance and upkeep of the hangars, such as security patrols, pest control, and building systems maintenance, would continue based on current funding levels and other maintenance priorities at Fort Wainwright; however, as large structural systems fail, they would not be replaced or receive major repairs. For example, while the Army had planned to continue to heat the facilities to prevent snow buildup on the roofs (which, if allowed to accumulate, could cause their collapse), the heating systems in both hangars became non-functional in the fall of 2013. As a result of the unsafe working conditions in and around the hangars, as well as cost considerations, the decision was made not to repair or replace the systems. Additionally, freezing and bursting of water pipes in Hangar 2 in late 2012 rendered the fire suppression system within the side offices inoperable. Unsafe working conditions and current funding levels prevent this system from being repaired as well.

Maintenance and upkeep of the hangars, including utilities, requires approximately \$350,000 per hangar in annual funding. Given the current disrepair of the hangars, they present safety concerns for any person entering them, and in some cases, safety concerns prevent maintenance. Prior to their condemnation in 2011, the following maintenance activities were performed: fire suppression sprinkler maintenance, oil-water separator maintenance, minor facility preventative maintenance, and project-by-project repair maintenance. All maintenance activities except fire suppression sprinkler maintenance

were halted following the determination that the hangars were unsafe for occupancy. Because there will be no large-scale rehabilitation efforts and the likelihood that future system failure will not result in replacement or repair, the structural integrity of the hangars will continue to deteriorate over time. The eventual uncontrolled collapse of the buildings or perhaps the total loss of one or both hangars by fire, due to inoperable fire suppression systems, is likely. In addition, with the heating systems in both hangars no longer functional and able to help prevent snow buildup on the roofs, the uncontrolled collapse of the buildings due to snow load is now more likely than previously thought. At such time the buildings do collapse, all debris would be treated as waste and disposed of in the FNSB landfill. Due to the uncontrolled nature of the potential collapse, it is likely that the option for salvaging, recycling, or reusing building materials would be eliminated. Thus, the total amount of debris generated under the No Action Alternative would likely be more than that generated under Alternative 1 due to the inability to divert materials from local landfills. Any follow-on actions associated with the location would be subject to funding, but the current preference would be that concrete is added to the building footprints to maintain consistency with the adjacent airfield as an aircraft parking apron.

3.3 Alternatives Eliminated from Detailed Consideration

As discussed above, a range of alternatives were evaluated during the screening process to determine their ability to satisfy the purpose and need of the Proposed Action. The alternatives that did not meet all four screening criteria and thus were eliminated from detailed analysis in the EIS were:

- Demolition of either Hangar 2 or Hangar 3 and conversion of the demolition footprint along the airfield to concrete apron
- Rehabilitation of either Hangar 2 or Hangar 3 or both to support the following uses:
 - a. Unmanned Aircraft System (UAS) maintenance hangar
 - b. Aviation combined arms tactical trainer (AVCATT) simulator training
 - c. Fixed simulator training
 - d. Physical fitness center/gymnasium
 - e. Arctic readiness center/fieldhouse
 - f. General purpose warm storage
 - g. Youth center
 - h. Museum
 - i. Roller rink

- Removal and reconstruction of either Hangar 2 or Hangar 3 or both on Fort Wainwright to support the following uses:
 - a. UAS maintenance hangar
 - b. AVCATT simulator training
 - c. Fixed simulator training
 - d. Physical fitness center/gymnasium
 - e. Arctic readiness center/fieldhouse
 - f. General purpose warm storage
 - g. Youth center
 - h. Museum
 - i. Roller rink
- Closed layaway of either Hangar 2 or Hangar 3 or both (i.e., hangars would be rehabilitated to ensure their long-term structural integrity, but they would remain permanently closed/vacant)
- Transfer of ownership of either Hangar 2 or Hangar 3 or both to the following non-Army entities:
 - a. Federal
 - b. State
 - c. Private/commercial

4.0 PUBLIC, AGENCY, AND TRIBAL INVOLVEMENT

In accordance with CEQ regulations (40 CFR §1500-1508) and the Army's NEPA-implementing regulations (32 CFR §651), the Army provided federal, state, and local agency stakeholders, the public, Alaska Native tribes, and other interested parties the following notifications and opportunities for involvement during preparation of the EIS:

- A Notice of Intent (NOI) to prepare an EIS was published in the Federal Register on November 16, 2011. Publication of the NOI began a 63-day scoping period from November 16, 2011, to January 17, 2012. The Army also published an Open House Public Meeting notice in the Fairbanks Daily News-Miner on November 11 and 16, 2011, and on December 4, 7, 11, and 14, 2011.

- As part of the scoping process, the USAG FWA held a public scoping meeting on December 14, 2011, at the Noel Wien Public Library in Fairbanks, Alaska. A separate agency scoping meeting was held on December 15, 2011, to inform agencies of the Proposed Action and to solicit input on the potential alternatives and areas of concern. The EIS considered and addressed each comment received during the scoping process.
- Because the Army's Proposed Action would involve potential adverse impacts to the Ladd Field NHL, in October 2011, the USAG FWA invited the National Park Service (NPS), the Advisory Council on Historic Preservation (ACHP), and the Alaska State Historic Preservation Office (SHPO) to become cooperating agencies for this EIS. Both the NPS and the ACHP declined the invitation, and no response was received from the Alaska SHPO; however, all three agencies participated in the NEPA process and were consulting parties in the NHPA Section 106 process.
- The USAG FWA consulted with Alaska Native tribes in accordance with the requirements of Department of Defense (DoD) Instruction 4710.02, *DoD Interactions with Federally-recognized Tribes*; Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*; the *DoD American Indian and Alaska Native Policy* and *Alaska Implementation Guidance*; and the Department of the Army *American Indian and Alaska Native Policy*. Six federally recognized tribes were sent letters notifying them of the Army's intent to prepare an EIS and informing them about the public scoping meeting times and locations. The tribes were offered the opportunity to enter into government-to-government consultation and to become consulting parties to the NHPA Section 106 process. The letters were followed up with emails, telephone calls, and faxes, respective of the tribes' wishes for mode of communication.
- The Army filed a Notice of Availability (NOA) for the Draft EIS with the U.S. Environmental Protection Agency (USEPA), and the notice was published in the Federal Register on June 21, 2013. Publication of the NOA began a 46-day public comment period that extended from June 21, 2013, to August 5, 2013.
- As part of the public comment process on the Draft EIS, the Army held a public meeting on July 10, 2013 and an agency meeting on July 11, 2013. A notice advertising the public meeting was published in the Fairbanks Daily News-Miner eight times leading up to the meeting with the first publication coinciding with the publication of the NOA in the Federal Register on June

21, 2013. The public meeting notice was also posted on the Fort Wainwright environmental website (<http://www.wainwright.army.mil/env/Current.html>).

- The USAG FWA mailed letters on June 18, 2013, to a number of federal, state, and local agencies informing them of the Draft EIS agency meeting; providing them a copy of the Draft EIS; and soliciting their comments on the Draft EIS. In addition to federal, state, and local agencies, the USAG FWA sent letters to six federally recognized Alaska Native tribes, inviting them to attend the public meeting and providing them with a copy of the Draft EIS.
- Public comments on the Draft EIS were received during the public meeting and via email during the public comment period. In addition to the comments received during the public meeting, three additional comment letters were received via email from members of the public. No other public comments were received by the end of the public comment period on August 5, 2013. All comments received were thoroughly considered and addressed in the Final EIS.
- Agency comments on the Draft EIS were received during the agency meeting and via letter and email. During the agency meeting, agency representatives provided feedback on the Proposed Action. In addition to the comments made and recorded during the agency meeting, five correspondences with comments were received from federal, state, and local agencies. No other agency comments were received by the end of the public comment period on August 5, 2013. All comments received were thoroughly considered and addressed in the Final EIS.
- The NOA for the Final EIS was published in the Federal Register by the USEPA on January 31, 2014. The Final EIS was made publically available for 30 days at the Noel Wien Public Library in Fairbanks, Alaska, and on the USAG FWA website: <http://www.wainwright.army.mil/env/Current.html>. The Final EIS was also distributed to all individuals, agencies, and organizations that received a copy of the Draft EIS, made comments on the Draft EIS, or indicated that they would like to receive a copy of the Final EIS. One new substantive comment was received on the Final EIS. It stated that the expense of demolishing the hangars was wasteful. As discussed below, however, the expense of demolition must be weighed against the recurring costs of maintenance.
- The NOA of this ROD will be published in the Federal Register. Following its publication, the ROD will be made available (with the Final EIS) on the USAG FWA website:

<http://www.wainwright.army.mil/env/Current.html>, and at the Noel Wien Public Library in Fairbanks, Alaska.

5.0 ENVIRONMENTAL CONSEQUENCES AND PROPOSED MITIGATION MEASURES

Implementation of this decision is expected to result in direct, indirect, and cumulative impacts. Impacts will occur as a result of the disposition of Hangars 2 and 3 and are fully evaluated in the Final EIS. I have considered the potential environmental impacts associated with the implementation of the preferred alternative (Alternative 1 in the Final EIS) and make this decision in consideration of the environmental impacts associated with each alternative evaluated in the Final EIS. The discussion below presents a summary of impacts that are anticipated to occur as a result of implementing the alternatives considered in the Final EIS. Mitigation measures to reduce impacts associated with the alternatives are also included in the discussion below.

5.1 Air Quality

The USEPA classifies a portion of the FNSB airshed as in nonattainment for particulate matter 2.5 (particles with a diameter less than or equal to a nominal 2.5 micrometers) (PM_{2.5}) and the entire airshed as *in maintenance* for carbon monoxide. An air quality analysis was conducted for the Proposed Action alternatives. The results, assumptions, and calculations for the analysis are included in Section 3.2 and Appendix G of the Final EIS.

Alternative 1 will require the operation of heavy equipment and dump trucks for demolition activities, including hauling demolition debris to the Fort Wainwright and FNSB landfills, and construction activities for placing an airfield concrete apron within the footprints of the hangars and associated infrastructure once they are removed. Emissions for criteria pollutants from these activities will not be significant because they fall below the *de minimis* regulatory threshold. Operational emissions, such as heating or vehicle emissions, associated with Alternative 1 will not increase. With both hangars being demolished, the operational demand on the Central Heat and Power Plant (CHPP) will be reduced, resulting in a decrease in the use of coal and emissions from the CHPP, providing a beneficial impact on air quality. Under Alternative 1, the only increase in criteria pollutants will be a small, temporary increase in PM_{2.5} emissions during demolition and construction activities, resulting in a short-term, minor impact on air quality. To help control fugitive dust, primarily PM_{2.5}, from ground-disturbing

activities, construction vehicles will adhere to best management practices (BMPs) that will include washing down all construction vehicles before leaving the project area and cleaning soil out of tracked equipment before entering the roadway. Other BMPs include using a water truck to moisten soils before any grading, minimizing areas of ground disturbance, and avoiding activity during periods of high wind.

Overall, once the hangars are demolished and the airfield concrete apron is completed, all emission pollutants will be reduced, including greenhouse gas emissions, resulting in long-term, beneficial impacts to air quality.

Under the No Action Alternative, as long as the hangars remain structurally intact, any operational emissions (heat and electrical use)² would result in continued long-term, minor impacts to air quality, but would not result in a change to the existing air quality conditions. Without large-scale rehabilitation efforts, it is expected that the hangars would eventually collapse. When that occurs, there would be temporary minor emissions from the use of construction equipment to remove the debris, including hauling debris to a landfill and placing an airfield concrete apron within the footprints of the hangars and associated infrastructure once the debris is removed. Once all demolition activities and the airfield concrete apron are complete, the No Action Alternative would result in long-term, beneficial impacts to air quality from the reduction in operational emissions and the reduced demand on the CHPP. BMPs similar to Alternative 1 would be used to help control fugitive dust, mainly PM_{2.5} during ground-disturbing activities.

5.2 Cultural Resources

Under Alternative 1, the loss of Hangars 2 and 3 as contributing resources to the Ladd Field NHL and the Cold War Historic District will be a severe impact because the two resources will lose their ability to convey their historic significance. Loss of contributing resources within a National Register district generally is significant because the physical fabric of the district is eroded.

Despite the physical loss of Hangars 2 and 3, the impacts to the overall integrity of the Ladd Field NHL and Cold War Historic District will be moderate. Even with the loss of the two hangars, the Ladd Field NHL and Cold War Historic District will continue to contain a large number of original contributing

² As described above, the heating systems have failed and cannot be safely repaired.

resources and, thus, retain their overall integrity and continue to convey their historical significance. An analysis of impacts to each aspect of integrity for the Ladd Field NHL and Cold War Historic District is summarized below.

Location—Under Alternative 1, the Ladd Field NHL and Cold War Historic District degree of integrity for Location will not be affected because the historic districts will not be moved and will remain located where they were originally constructed and where the historic events of cold weather testing, World War II, and the Cold War occurred.

Setting—Alternative 1 will affect two elements of Setting: the visual connections within certain portions of the landmark and the hangars themselves. With the loss of the two hangars, the visual connection between the original North Post area and the hangars will be lost.

Feeling—The aspect of Feeling is created by the combination of the six other aspects of integrity. Because the loss of the hangars under Alternative 1 will affect Setting, Association, Materials, and Design, it will also have a moderate impact to Feeling within the southwest corner of the Ladd Field NHL and the Cold War Historic District. Even with this impact, a high degree of Feeling will continue to exist within the Ladd Field NHL and the Cold War Historic District because the area that most expresses this aspect of integrity is the North Post.

Association—Alternative 1 will cause a moderate impact to the integrity of Association through the loss of the two hangars. Although the hangars were historically associated with the air depot and Lend-Lease Operations, the Ladd Field NHL will still retain a high degree of Association because the vast majority of activities associated with cold weather testing and the transfer of aircraft to the Russians occurred in North Post. Associations with Cold War operations will remain intact.

Materials—Alternative 1 will cause a moderate impact to the integrity of Materials because of the loss of the wooden bowstring trusses used in the construction of Hangars 2 and 3. This is a material that is only found within these two contributing resources of the Ladd Field NHL and the Cold War Historic District.

Workmanship—Hangars 2 and 3 are a standard design that was used on many military installations in Alaska; therefore, they possess a low degree of Workmanship associated with semi-permanent and temporary wartime construction. Therefore, the loss of the hangars will not affect the integrity of Workmanship within the Ladd Field NHL or the Cold War Historic District.

Design—Alternative 1 will cause a moderate impact to Design as an aspect of integrity because of the loss of contributing resources that exemplify the type of design found during the war effort of World War II. Even with the loss of Hangars 2 and 3, the Ladd Field NHL and Cold War Historic District will continue to retain a high degree of integrity for Design through the planned, formally designed, largely intact North Post.

In summary, although Hangars 2 and 3 are contributing resources to the Ladd Field NHL and the Cold War Historic District, the demolition of these two hangars will not affect any of the seven aspects of integrity to the degree that the integrity of the Ladd Field NHL or the Cold War Historic District will change. Both historic districts will retain sufficient integrity to convey their historical significance.

In November 2011, the USAG FWA initiated Section 106 consultation under the NHPA with the Alaska SHPO and other consulting parties because the Proposed Action would result in adverse impacts to the Ladd Field NHL and the Cold War Historic District. Through this consultation, a Memorandum of Agreement (MOA) was developed that includes mitigation for these impacts. Because of the large amount of previous mitigation associated with Hangars 2 and 3 (see Section 3.3.1.4 of the Final EIS), the Army has determined that a reduced amount of additional mitigation is appropriate to compensate for the adverse effects of the Proposed Action. As agreed upon through the Section 106 consultation process, the mitigation measures, which are fully described in the MOA (Appendix A of the Final EIS), will include public outreach, re-evaluation of the Ladd Field NHL, and stewardship of the Ladd Field NHL.

The No Action Alternative would likely result in the loss of both hangars through either the catastrophic structural failure of the buildings or possibly by fire. Therefore, the impacts of the No Action Alternative would be the same as the impacts for Alternative 1 because the end state of the hangars (physical loss) is the same; the impacts under the No Action Alternative would just occur at a later time while the impacts from Alternative 1 would be immediate. As agreed upon by the consulting parties under the Section 106 process, mitigation under the No Action Alternative would be the same as for Alternative 1, except that the documentation for the re-evaluation of the Ladd Field NHL would be submitted to the NPS Alaska Region within five years after the execution of the MOA instead of within five years of the demolition of the hangars.

5.3 Hazardous Materials/Hazardous Waste

Demolition activities will be conducted per all applicable federal, state, Army, and installation regulations, guidelines, and management plans. The USAG FWA, through its contract, will provide the demolition and construction contractor with the requirements for handling, removing, and disposing of existing hazardous materials/hazardous waste in the buildings; and the requirements for the potential use of hazardous materials and generation of hazardous waste that will result during the demolition and construction activities. As part of the contract, the contractor will be required to prepare and submit a Hazardous Materials Abatement Work Plan to be approved by the USAG FWA for waste containment, removal, and disposal of the hazardous materials and hazardous waste.

Under Alternative 1, the USAG FWA will demolish and remove materials within the hangars that have been determined to be ACBM. Appropriately licensed and trained contractors will conduct the demolition and removal of the hangars in compliance with applicable federal and state regulations, and in adherence to the USAG FWA's management plans. Per the USAG FWA's Asbestos Management Plan, a licensed contractor will be responsible for handling any ACBM in accordance with applicable USEPA and Occupational Safety and Health Administration (OSHA) regulations. Per National Emission Standards for Hazardous Air Pollutants requirements for asbestos, the USAG FWA will provide a written "Notification of Demolition and Renovation" to the USEPA Region 10 Asbestos Coordinator 10 working days prior to beginning any work on an asbestos project. The ACBM will be transported, in compliance with all applicable regulations, to the Fort Wainwright landfill for disposal.

Under Alternative 1, the USAG FWA will also demolish the small, vacant, open flammable liquids storage facility. Because of the historic use of the area as storage for hazardous materials, contaminants are likely to be present in the ground in the area. During ground-disturbing activities, the excavated soil will be screened for potential contaminants to include field screening for petroleum products (plus any other identified contaminants). Soils exhibiting readings of 20 parts per million or higher will be handled per requirements stated in the USAG FWA's *Environmental Concerns for MILCON Projects, Appendix A, Handling / Management of Contaminated Soil*.

Because of the age of the structure and type of construction, it is assumed that all painted surfaces in the hangars contain lead at some level. Per the USAG FWA Lead-based Paint (LBP) Management Plan, appropriately licensed and trained contractors will conduct LBP removal in accordance with applicable OSHA, Alaska Department of Environmental Conservation (ADEC), and Army regulations. LBP waste

from buildings that are demolished will require disposal in accordance with the USEPA, Army, ADEC, and USAG FWA regulations and requirements and will be disposed of at the FNSB landfill.

To ensure the protection of workers and the environment, the hazardous materials and hazardous waste will be removed, transported, and disposed of in compliance with applicable federal, state, Army, and USAG FWA regulations, as well as FNSB landfill requirements. In the event that mold, mildew, and bird guano are found in the buildings, the contractor will be required to perform abatement, debris removal, and demolition activities in a manner that prevents exposure of workers to airborne pathogens and biological matter. The contractor will be required to properly remove the contaminants prior to building demolition and will be responsible for the lawful collection, characterization, and disposal of all biological matter on surfaces in accordance with the USEPA regulations. Prior to the demolition of Hangars 2 and 3, the USAG FWA will conduct appropriate surveys to further verify and confirm the presence and extent of the hazardous materials and hazardous waste.

The proposed demolition and concrete airfield apron construction is not expected to affect the contaminated area adjacent to Hangar 3 because these activities will be conducted within the footprint of the existing hangar and will not be conducted within the area of known contamination. If additional hazardous materials and hazardous waste that have not been identified are encountered during demolition activities and if those substances could be hazardous to human health upon disturbance, the contractor will be required to stop that portion of work and notify the Contracting Officer immediately. The USAG FWA will then determine in a timely manner if the material is hazardous. If the material is not hazardous or poses no danger, the USAG FWA will direct the contractor to proceed without change. If material is hazardous and handling of the material is necessary to accomplish the work, the USAG FWA will issue an appropriate modification to the contract. While no underground storage tanks are known to exist on the project site, if any underground storage tanks are discovered during demolition, their removal will be conducted in compliance with federal and state regulations, and any contaminated soils will be remediated.

Under Alternative 1, minor impacts are anticipated from contaminated soils, hazardous materials, and hazardous waste because the demolition, disposal, and construction activities will be conducted in compliance with federal, state, and Army regulations and with adherence to the USAG FWA's specific guidance. The proper removal and disposal will result in beneficial impacts in the long term because the risk of potential exposure to the environment will be avoided. Beyond adherence to the plans and regulations discussed above, no additional mitigation has been identified or will be needed.

The No Action Alternative would result in moderate impacts related to contaminated soils, hazardous materials, and hazardous waste. Although the USAG FWA would continue to follow its current procedures regarding the management of hazardous materials and waste, the continued degradation of the hangars would result in an increased risk of exposure to the environment from contaminated soils, hazardous materials, and hazardous waste. These types of exposures could occur if the buildings deteriorate to the point where the interiors are exposed to the elements or the buildings collapse.

5.4 Safety

Under Alternative 1, demolition activities will pose safety hazards because of the structural degradation and the presence of the hazardous materials/waste and other concerns, such as petroleum, oils, and lubricants; ACBM; LBP; polychlorinated biphenyls; and others. However, the USAG FWA will conduct both the demolition activities and the construction of the concrete airfield apron in compliance with the applicable regulations and guidance, including 29 CFR §1926, *Safety and Health Regulations for Construction*, and applicable subparts of 29 CFR §1910, *Occupational Safety and Health Standards*, and ensure the safety and health of the workers during construction. The demolition contractor will be required to prepare and submit a Health and Safety Plan. Prior to the demolition activities, appropriate surveys will be conducted to further verify and confirm the presence and extent of hazardous materials and contaminants.

Under Alternative 1, the USAG FWA will remove, transport, and dispose of hazardous materials/waste and other contaminants, in compliance with federal, state, and Army regulations and in adherence to the installation's specific guidance. Prior to mobilizing to the site, the demolition contractor will be required to erect temporary project safety fencing around the entire perimeter of the project site and be responsible for maintaining the integrity of the perimeter fence, access into and out of the job site, and unauthorized entry into the facilities themselves. As a result, Alternative 1 will result in only minor safety impacts during the demolition of the hangars and construction of the airfield concrete apron. By following applicable regulations for packing and hauling hazardous materials and abiding by posted speed limits and road weight limits, the USAG FWA's contractor will ensure that safety will not be compromised when hauling the debris along the truck routes to the landfills.

Once the hangars are demolished and the airfield concrete apron is completed, Alternative 1 will result in long-term, beneficial effects on safety because the hazardous materials will be removed and properly disposed of and there will no longer be a risk of structural failure. Under Alternative 1, mitigation

measures will not be required because the USAG FWA's contractor will comply with the federal, state, and Army regulations to avoid adverse effects on safety. The contractor's adherence to the USAG FWA's specific guidance for demolition and construction activities at Fort Wainwright and for the removal and disposal of contaminated soils, hazardous materials, and hazardous waste will also serve to avoid adverse effects; therefore, no mitigation measures have been identified or will be needed.

The No Action Alternative would result in long-term, moderate impacts on safety because Hangars 2 and 3 would continue to remain unoccupied because they have both been found to be unsafe for occupancy. As major systems in the hangars continue to fail (similar to the water pipes freezing in Hangar 2 in late 2012, which rendered the fire suppression system in the side offices nonfunctional), these systems would not be replaced or repaired. The structural integrity of the hangars would continue to deteriorate, and it is assumed that the hangars would eventually collapse. Structural failure would increase the moderate risk of exposure to building debris and hazardous materials and waste in the environment immediately adjacent to the hangars. As the buildings continue to deteriorate over time, the No Action Alternative would not address the buildings' vulnerability to soil liquefaction during a seismic event.

Once the buildings collapse, removal and transport of the demolition debris, including hazardous materials and hazardous waste, would be conducted in compliance with applicable regulations and Fort Wainwright and FNSB landfill requirements. Once the buildings collapse, the No Action Alternative would result in only minor impact to safety during the removal, transport, and disposal of the demolition debris and construction of the airfield concrete apron. When the hangars are demolished and the airfield concrete apron is completed, the No Action Alternative would result in long-term, beneficial impacts to safety.

5.5 Environmental Justice and Protection of Children

The median household income in 2010 for FNSB was higher than the median household income for the state and the nation. In 2010, approximately 7.6 percent of the population in the borough lived below the poverty threshold, which is lower than the state and national figures. Four of the census tracts that the Region of Influence (ROI) is located within have relatively high minority populations; however, it is not anticipated that this project will have an adverse or disproportionate impact on these populations because there is no housing located close to Hangar 2 or Hangar 3. While trucks hauling demolition debris to the landfills will have a short-term, minor impact on traffic volume on the haul route roads,

the roads to be traveled are separated from the surrounding communities by trees, berms, landscaping buffers, or fencing for most of their length, and these routes are currently heavily travelled by trucks. Therefore, no environmental justice impacts will occur as a result of this alternative.

Although the southern exterior sides of Hangars 2 and 3 are open to the post, the hangars are currently kept locked as a result of their condemned status. During the demolition of these buildings, the demolition contractor will be required to erect temporary project safety fencing around the entire perimeter of the project site. Consequently, it is anticipated that these hangars will not pose harm to children on the installation either before or during their demolition.

Two on-post facilities—the Outdoor Recreation Center and the Child Development Center—have relatively high proportions of children and are located adjacent to the potential route that demolition truck traffic will use to haul waste off-post to the FNSB landfill. The potential routes for demolition trucks traveling both on- and off-post also pass within 200 to 300 feet of some homes, recreation areas, and sidewalks that children could live in or use. However, the demolition trucks will travel past these facilities, homes, recreation areas, and sidewalks only temporarily during the demolition period, and these routes are already heavily travelled by trucks. Truck operators are expected to comply with all laws and regulations that govern the transportation of demolition and hazardous material debris and to follow posted speed limits and other roadway safety measures. As a result, adverse and disproportionate impacts on children either on or off the installation will not occur under Alternative 1. Because there will be no environmental justice or protection of children impacts under Alternative 1, no mitigation measures have been identified or are needed.

Under the No Action Alternative, with no major rehabilitation effort or repair or replacement of major systems as they fail, the hangars would continue to deteriorate, and it is assumed that the hangars would eventually collapse from a catastrophic structural failure. It is not expected that a fence would be installed around Hangars 2 and 3 under this alternative; however, the hangars would remain locked. Because children do not generally pass by these hangars, it is not expected that these structures would pose a risk to them. Furthermore, no Family Housing is located within 100 feet of the hangars; therefore, no environmental justice impacts or impacts to children are anticipated to occur as a result of housing being located in proximity to the hangars. When the hangars do eventually collapse on their own, the USAG FWA would remove the debris and dispose of it in the Fort Wainwright and FNSB landfills. Disposing of the demolition debris and construction of the airfield concrete apron in the footprint of the buildings and supporting infrastructure would result in no environmental justice

impacts, and there would be no adverse or disproportionate impacts on children either on or off Fort Wainwright.

5.6 Sustainability

Under Alternative 1, to comply with the Army's goal of not exceeding 50 percent of construction and demolition (C&D) materials being disposed of in a landfill, non-hazardous materials will be diverted from the FNSB landfill to the greatest extent possible. However, because not all of the C&D materials could be reused or recycled, new materials and emissions will be generated from the construction of the airfield concrete apron, and embodied energy will be lost due to the demolition of the hangars, impacts to sustainability under Alternative 1 will be short term and minor. Reduced energy consumption, cost savings, and the ability to recycle materials not currently being used will result in long-term, beneficial impacts to sustainability as a result of this alternative. Because adverse impacts will be only temporary and minor, no mitigation measures for sustainability are identified or needed under Alternative 1.

Under the No Action Alternative, Hangars 2 and 3 would remain in their current condition, serving no active military function. Existing energy demand requirements stemming from electricity and heating to prevent snow buildup on the roofs would continue, and costs and energy demand are anticipated to be similar to those currently being experienced: \$350,000 per hangar and approximately 3,000 tons of coal combined annually (approximately 1 percent of the fossil fuel use at Fort Wainwright). Some short-term, beneficial impacts to sustainability would be expected because no demolition debris would be generated, no construction emissions would occur, and no new materials would be needed. The hangars would eventually collapse due to their compromised structural integrity and their continued deterioration. In the event of a complete failure, it would be more difficult to properly remediate hazardous materials due to contamination of the debris, and other hazardous materials in the buildings. As a result, the amount of building materials that could be reused or recycled would be greatly reduced, resulting in moderate impacts to sustainability.

5.7 Transportation

No road closures or detours are anticipated during construction periods; however, there will be short-term, minor impacts associated with the increase in vehicles generated by construction workers and dump trucks during the demolition and construction activities.

Implementing Alternative 1 will result in short-term, minor impacts at two already failing intersections as a result of temporary construction worker and truck trips. Because Alternative 1 will not result in significant impacts to traffic or the transportation infrastructure, no mitigation measures were identified or will be required; however, as standard practices, BMPs will be employed.

As a BMP during the demolition of the hangars, the Army's contractor will provide a traffic control plan and temporary signing plan to provide road access to adjacent occupied building parking lots and entrances, as well as safety measures for pedestrians and occupants of adjacent buildings. The traffic control plan will present the placement and times of use for any temporary traffic control devices in relation to the project site and construction activities and will follow the Manual on Uniform Traffic Control Devices standards. The Army's contractor will also maintain and protect traffic on affected on-post roads during the construction period. This will include implementing measures for the protection and diversion of general traffic (watchman, flagmen, barricades, temporary lighting, signing), minimizing interference with general traffic along the proposed truck haul route on-post, and investigating the adequacy of existing roads and bridge allowable limits.

Under the No Action Alternative, while Hangars 2 and 3 remain intact there would be no impact on transportation because they would continue to remain vacant. As future systems fail they would not be repaired or replaced, and it is assumed that they would eventually collapse on their own. When this occurs, the Army would remove the debris, disposing of it in the Fort Wainwright and FNSB landfill and place airfield concrete apron within the footprints of the hangars after the debris is removed. These activities would involve the same number of construction worker and truck trips as Alternative 1, and would result in short-term, minor impacts associated with the increase in temporary construction worker and truck trips during the demolition of both hangars. Once the debris from the collapsed hangars is removed and the airfield concrete apron is placed in the footprints of the buildings, there would be no long-term impacts on traffic.

5.8 Cumulative Effects

The Army conducted a cumulative impact assessment to determine if the combined effects of Alternative 1 or the No Action Alternative along with other projects occurring in the region might be significant. Section 3.9.3 of the Final EIS provides a general description of the past, present, and reasonably foreseeable future actions included in the cumulative impact assessment. After review of past, present, and reasonably foreseeable future actions occurring in the same ROI as the Proposed

Action, the Army determined that the following resources could be sensitive to cumulative effects: cultural resources and hazardous materials/hazardous wastes.

For cultural resources, the geographic scope of analysis was expanded to include World War II resources in Alaska, with particular focus on World War II NHLs in Alaska. For hazardous materials/hazardous waste, the geographic scope included FNSB. Other past, present, and reasonably foreseeable future actions considered during the cumulative effects analysis comprise military construction, military training, military reorganization, and World War II resources. The analysis in the Final EIS concludes that there will be cumulative effects on cultural resources and from hazardous materials/hazardous waste under both Alternative 1 and the No Action Alternative; however, the effects will not be significant. For cultural resources, the loss of the two hangars will contribute to the dwindling numbers of World War II resources in Alaska, resulting in moderate cumulative impacts. For hazardous materials/hazardous waste, the amount of construction and demolition debris from the Proposed Action and other identified projects disposed of in the landfills will contribute to minor cumulative impacts. Impacts will be minor because the Fort Wainwright landfill already has a proposed closure date of September 2015, and the FNSB landfill already accepts on average 298 tons of debris per day and is expected to be operational until the year 2086.

5.9 Environmentally Preferred Alternative

The Army identified Alternative 1: Demolition of Hangars 2 and 3 as the environmentally preferred alternative because it causes the least adverse effects while providing the greatest amount of beneficial effects. Both Alternative 1 and Alternative 2: No Action will result in the same impacts for Air Quality, Cultural Resources, Environmental Justice and Protection of Children, and Transportation. Because Alternative 1 involves the controlled demolition of the hangars, however, hazardous materials will be identified and properly disposed of; avoiding the risk of potential exposure to the environment, while under Alternative 2 the continued degradation of the hangars would result in an increased risk of exposure to the environment from contaminated soils, hazardous materials, and hazardous waste. Demolition of the hangars under Alternative 1 will immediately remove the safety hazard that the condemned hangars present, while Alternative 2 would allow the safety hazard to continue and would eventually result in the uncontrolled collapse of the buildings. By implementing a controlled demolition of the hangars under Alternative 1, a greater amount of non-hazardous materials will be able to be recycled and diverted from local landfills as compared to Alternative 2. Alternative 1 will also immediately eliminate the operating costs and energy consumption and of the hangars, while under

Alternative 2 the condemned buildings could continue to result in an operating cost of approximately \$350,000 per hangar and the consumption of approximately 3,000 tons of coal combined annually assuming major systems such as electrical, heating, etc. could be repaired or replaced.

6.0 MITIGATION COMMITMENTS

The Army is committed to sustaining and preserving the environment. Because of the adverse impacts on the Ladd Field NHL and the Cold War Historic District, as part of the decision to implement Alternative 1 for the disposition of Hangars 2 and 3 at Fort Wainwright, the Army will enact mitigation measures to minimize the impacts of this decision. The mitigation measures were developed and agreed upon in an MOA among the USAG FWA, the Alaska SHPO, and the ACHP through the Section 106 consultation process. The mitigation measures, which are fully described in the MOA (see Appendix A of the Final EIS), are summarized below.

- **Public Outreach**—In pursuit of more visibility and appreciation for the Ladd Field NHL, the USAG FWA Cultural Resources staff will be available upon request to present lectures to local Fairbanks groups (military and/or non-military) on Fort Wainwright's World War II history. This availability will be noted on the USAG FWA's Environmental website and emails will be sent out to local groups within one month of the execution of the MOA. The USAG FWA will continue to engage the public through the use of previously developed publications by making information and tools available for teachers and other educators, including the Teaching with Historic Places lesson plan on Ladd Field and its role in World War II. In pursuit of more visibility and appreciation for the Ladd Field NHL, the USAG FWA will submit, at minimum, three articles concerning the historic preservation of Fort Wainwright's Ladd Field NHL to local or state publications, possibly including, but not limited to, local, non-profit and statewide newspapers, websites, various social media, and newsletters within one year of executing the MOA and two articles a year, every year, for a subsequent four years. The USAG FWA will provide all public outreach documentation and recordation documentation of Hangars 2 and 3 created by the Cultural Resources Office to Fairbanks North Star Borough to be used to augment any of their public outreach objectives within two years of execution of the MOA. For five years from the execution of the MOA, the USAG FWA will update and seek input twice a year from consulting parties on the public outreach projects starting six months after the execution of the MOA.

- **Re-evaluation of the Ladd Field NHL**—The USAG FWA will complete a re-evaluation of the Ladd Field NHL, through preparation of a revised draft NHL nomination, including an analysis of cumulative effects on the Ladd Field NHL from previous demolitions and additions. The USAG FWA will work with the SHPO and NPS as subject matter experts on state and national historic properties to obtain new and relevant information on other historic properties associated with the Lend-Lease Program for the re-evaluation. Within four years of the demolition of Hangars 2 and 3, a draft of the Ladd Field NHL re-evaluation will be submitted to the consulting parties for a 30-day calendar review. The USAG FWA will consider any comments on the draft received from the consulting parties. The USAG FWA will submit a final version of the re-evaluation to the consulting parties no less than a year after submitting the first draft. The re-evaluation will include submitting the appropriate documentation to the NPS Alaska Region within five years of the demolition of Hangars 2 and 3.
- **Stewardship of the Ladd Field NHL**—With the expected loss of Hangars 2 and 3, the USAG FWA will refocus the efforts of its DPW staff on effective stewardship through focused and purposeful management of the remaining contributing resources that comprise the Ladd Field NHL. The USAG FWA will utilize existing and currently planned documentation to further historic preservation objectives and goals including, but not limited to, utilizing the already developed Design Guidelines for the Ladd Field NHL, the educational PowerPoint presentations on historic preservation subjects, and the currently planned but not yet developed Historic Buildings Assessment Report.³ Within one year of completing the Historic Buildings Assessment Report for the Ladd Field NHL, recommendations from the report will be submitted for consideration in the DPW Annual Work Plan.⁴

While Alternative 1 will not result in significant impacts to any of the resource areas other than cultural resources, there are a number of standard measures, including BMPs, which the Army will employ to reduce or minimize potential impacts for air quality, hazardous materials and hazardous waste, and transportation. These measures are listed in Section 3.10 of the Final EIS.

³ The Historic Buildings Assessment Report will detail maintenance and repair needs for the Ladd Field NHL and Cold War Historic District buildings.

⁴ The Annual Work Plan is DPW's yearly list of possible repair and maintenance projects for Fort Wainwright buildings.


These measures represent all practicable means to avoid or minimize environmental harm resulting from the selected action, and have been adopted. The existing condition of the hangars will also not preclude any of the agreed upon mitigation measures from being carried out. As appropriate, the Army will employ a monitoring and enforcement program for the mitigations adopted in this decision.

7.0 DECISION FOR THE DISPOSITION OF HANGARS 2 AND 3 AT FORT WAINWRIGHT, ALASKA

In the Final EIS, the Army identifies Alternative 1 as the preferred alternative for the disposition of Hangars 2 and 3 at Fort Wainwright, Alaska. Under this alternative, Hangars 2 and 3 and their supporting infrastructure will be demolished.

I have considered the results of the analysis in the Final EIS, supporting studies, and comments provided during formal comment and review periods. Based on this review, I have determined that Alternative 1 (the Army's selected alternative) allows the Army to meet mission requirements while eliminating the potential safety hazard presented by Hangars 2 and 3. This alternative also reflects the proper balance of technical and economic feasibility and environmental and social issues. All practicable means to avoid or minimize environmental harm resulting from the selected action have been adopted, and the existing condition of the hangars will not preclude any of the agreed upon or identified mitigation measures from being carried out. As appropriate, the Army will also employ a monitoring and enforcement program for the mitigations adopted in this decision.

The only other alternative carried forward for analysis in the Final EIS is the No Action Alternative. The No Action Alternative does not meet the Army's purpose and need; therefore, I have not chosen it.


S.C. ZEMP
Colonel, AG
Commanding

5 March 2014
Date

APPENDIX A

List of Acronyms

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Appendix A

List of Acronyms

ACBM	Asbestos-containing Building Materials
ACHP	Advisory Council on Historic Preservation
ADEC	Alaska Department of Environmental Conservation
Army	U.S. Army
AVCATT	Aviation combined arms tactical trainer
BMP	Best Management Practice
C&D	Construction and Demolition
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CHPP	Central Heat and Power Plant
Cold War Historic District	Ladd Air Force Base Cold War Historic District
DoD	Department of Defense
DPW	Directorate of Public Works
EIS	Environmental Impact Statement
FNSB	Fairbanks North Star Borough
FWA	Fort Wainwright Alaska
Ladd Field NHL	Ladd Field National Historic Landmark
LBP	Lead-based paint
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOI	Notice of Intent

NPS	National Park Service
OSHA	Occupational Safety and Health Administration
PM _{2.5}	Particulate Matter with a Diameter Less Than or Equal to a Nominal 2.5 Micrometers
ROD	Record of Decision
ROI	Region of Influence
SHPO	State Historic Preservation Office
UAS	Unmanned Aircraft System
U.S.	United States
USAG	United States Army Garrison
USC	United States Code
USEPA	United States Environmental Protection Agency



Fort Wainwright
Disposition of Hangars 2 & 3

RECORD OF DECISION

FORT WAINWRIGHT, ALASKA
MARCH 2014

