

ENVIRONMENTAL ASSESSMENT

for

Construction and Operation of a Soldier Fitness Training and Testing Facility at Fort Drum, New York

DECEMBER 2024

Prepared by:
U.S Army Garrison Fort Drum
Environmental Division Natural Resources Branch
Directorate of Public Works

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ACRONYMS AND ABBREVIATIONS

ACFT	Army Combat Fitness Testing
AR	Army Regulation
BA	Biological Assessment
BO	Biological Opinion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	Environmental Assessment
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FONSI	Finding of No Significant Impact
H2F	Holistic Health Fitness
NEPA	National Environmental Policy Act
NY	New York
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
SFTTF	Soldier Fitness Training and Testing Facility
SPRC	Soldiers Performance Readiness Center
SWPPP	Stormwater Pollution Prevention Plan
US	United States
USAG	United States Army Garrison
USFWS	United States Fish and Wildlife Service
WSAAF	Wheeler-Sack Army Airfield

ENVIRONMENTAL ASSESSMENT

Construction and Operation of a Soldier Fitness Training and Testing Facility Fort Drum, New York

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1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 Background

The Army goal to generate lethal Soldiers who are physically fit and mentally tough to engage with and overmatch the enemy in multi- domain operations, requires the availability of state of the art programs and facilities.

Fort Drum is required to provide physical fitness training and testing facilities for Soldiers to take the Army Combat Fitness Test (ACFT) and to comply with Installation standards for outdoor physical training (PT). This is challenging when weather conditions involve extreme road icing, heavy rain, dense fog, freezing rain, heavy snow, blizzards or temperatures below -20 degrees. Fort Drum has experienced temperatures below -20F on 27 percent of the scheduled PT days and severe rain events are becoming more common.

To achieve the requirements of the 2023 Army Standards Fort Drum proposes the addition of new facilities to support the ACFT and perform Holistic Health Fitness (H2F) functions, with the goal to provide state of the art indoor physical fitness testing and physical therapy and care to Soldiers.

1.2 Purpose and Need

This environmental assessment (EA) is required to evaluate the potential environmental effects that would occur as a result of the proposed construction and operation of a Soldier Fitness Training and Testing Facility (SFTTF) to accommodate year round fitness training and testing and H2F Soldier care.

This NEPA document identifies the potential environmental effects that may result from the proposed action. It is an assessment of the proposed construction and operation of a Physical Fitness Testing Facility Field House, also referred to as a Soldier Fitness Training and Testing Facility (SFTTF). The estimated project site for this facility will require a ten to twelve acre site to build a 83,000 square foot facility with parking areas, supporting utilities, site improvements, access roadways, signage and environmental protection.

1.3 Scope of the Analysis

This EA has been developed in accordance with National Environmental Policy Act (NEPA), as implemented by the regulations issued by the Council on Environmental Quality (CEQ), 40 CFR Parts 1505-1508 and the Army's implementing procedures as

outlined in 32 CFR Part 651 *Environmental Analysis of Army Actions; Final Rule* (formerly Army Regulation 200-2).

This EA analyzes the potential effects of the proposed action and alternatives. It incorporates past environmental analysis, where applicable, to assessing potential impacts of implementing the proposed action. It identifies the potential direct, indirect and cumulative effects on the human environment that may result from the proposed action and alternatives, including the No action Alternative, and will determine whether or not any such effects are significant. If the EA discloses any significant impacts, the Army will publish a Notice of Intent to prepare an Environmental Impact Statement (EIS). Otherwise, the Army will sign a Finding of No Significant Impact (FONSI).

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

The proposed action is to construct and operate a consolidated Soldier Fitness Training and Testing Facility to support required testing the Army Combat Fitness Test (ACFT) and provide dedicated space for the weekly training designed to generate lethal Soldiers who are physically fit and mentally tough to engage with and overmatch the enemy in multi-domain operations. The facility concept is for it to have a large clear span room with an artificial turf field, consultation/assessment/therapy rooms or spaces, an admin office area, bleachers, running track, bathrooms, lockers, and showers.

A second alternative considered involves constructing multiple facilities to include a central Physical Fitness Testing Facility Field House and separate Soldier Performance Readiness Centers (SPRC) in vicinity of each Brigade area, that is supplied and staffed to support each Brigade, dedicated for the weekly training designed to generate lethal Soldiers who are physically fit and mentally tough to engage with and overmatch the enemy in multi-domain operations. The Field House facility would have a large clear span room with an artificial turf field, an admin office area, bleachers, running track, bathrooms, lockers, and showers. The SPRC facilities would have a small clear span room with an artificial turf field, lockers, bathrooms, admin office area, and bleachers.

The last alternative considered is the No Action Alternative. This alternative is to continue Soldier Readiness Training and Testing in existing facilities that cannot accommodate large numbers of soldiers when training outside is impacted by severe inclement weather conditions, risking exposure to extended sub-zero temperatures, ice, and heavy snow, and impacts the ability to train or test to the Army Standard. Failing to provide adequate facility to perform Holistic Health and Fitness is detrimental to the Soldiers health and wellbeing.

Each alternative was considered for meeting the purpose and need to support current Army fitness training and testing requirements at Fort Drum and to provide dedicated designated enclosed space for training when weather prohibits being outside. This EA identifies the potential direct, indirect and cumulative effects on the human environment that may result from the proposed action and will determine whether or not the effects are significant. If the EA discloses significant impacts, the Army will publish a Notice of

Intent to prepare an EIS. Otherwise, the Army will sign a Finding of No Significant Impact (FONSI).

2.1 Alternative 1 – The Preferred Alternative

The proposed action is to construct and operate a consolidated Soldier Fitness Training and Testing Facility (SFTTF) that can accommodate multiple Brigades, be centrally located in the Cantonment and near the Brigades and is supplied and staffed to support multiple functions in one facility for larger number of Soldiers.

The central location for this alternative is an approximate near center of the Cantonment Area North Post section of the installation in the southeast corner where Euphrates River Valley Road and Lagarda Lane meet. This site is north of the Bowe Medical Clinic, a Soldier Family Care Center constructed in 2015. (Figure 2.1).

2.2 Alternative 2 – The Multiple Facility Alternative

This alternative is to construct a Physical Fitness Testing Facility Field House (Field House) and multiple Soldiers Performance Readiness Centers (SPRC) in vicinity of each Brigade and is supplied and staffed to support each Brigade. This alternative could include five or more separate construction sites.

The location for the Field House is the same location as Alternative 1 with a smaller footprint. The locations of the SPRC are located around the Brigade Headquarter area footprints in the east side of the North Post, Central Post, and WSAAF. (Figure 2.2)

2.3 Alternative 3 – The No Action Alternative

The No Action Alternative is to continue Soldier Readiness Training and Testing in existing facilities that cannot accommodate large numbers of soldiers and to continue to be impacted by severe inclement weather conditions, risking exposure to extended sub-zero temperatures, ice, and heavy snow, and impacts the ability to train or test to the Army Standard. This alternative would fail to provide adequate physical fitness and holistic health support and underserve Soldier health and wellbeing.

2.4 Screening Criteria

Constructing the SFTTF will benefit the Soldier and enhance the quality of training and medical care afforded them. As a result of initial scoping for this assessment, it has been determined that the action will have no effect on certain resource areas that frequently receive attention in NEPA analyses. Resource areas that were considered but excluded from further detailed analysis in this EA include: airspace, climate, cultural resources, geology (except soils), hazardous materials / hazardous wastes, infrastructure (potable water supply, electricity, wastewater treatment, HVAC (heating, ventilation, and air conditioning), noise, telecommunications, traffic and transportation, solid waste (disposal, roadways), socioeconomic conditions, environmental justice (effects on low-income and minority populations), protection of children from environmental health and safety risks, water resources, and wetlands. The proposed

action will have no measurable changes in local or regional employment or other economic indicators.

This EA addresses potential impacts to resources, such as air, biological resources (vegetation, wildlife, threatened and endangered species), land use, and soils. The EA was prepared utilizing a systematic, interdisciplinary approach integrating the natural and social sciences with planning and decision-making.

Table 1: Summary of Potential Impacts Resulting from Implementation of the Proposed Action and the Alternatives

Resource Area:	Alternative 1: One Facility	Alternative 2: Many Facilities	Alternative 3: No Action	Analyzed or Dismissed from further analysis
Air Quality	L	L	N	Analyzed
Airspace	N	N	N	Dismissed
Biological Resources	L	L	N	Analyzed
Climate	N	N	N	Dismissed but discussed
Cultural Resources	N	N	N	Dismissed
Facilities / Utilities	B	B	L	Dismissed
Geology	N	N	N	Dismissed
Hazardous Materials / Hazardous Wastes	N	N	N	Dismissed
Infrastructure	L	L	N	Dismissed
Land Use	N	N	N	Analyzed
Noise	L	L	N	Dismissed
Socioeconomics	B	B	N	Analyzed
- Environmental Justice	N	N	N	Analyzed
- Protection of Children	N	N	N	Analyzed
Soils	L	L	N	Analyzed
Traffic and Transportation	L	L	N	Dismissed
Water Resources	L	L	N	Dismissed
Wetlands	NA	NA	N	Dismissed

Key: NA = Not Applicable; B = beneficial; N = no impact; L = low/ minor; M = moderate/less than significant; SM = significant but mitigable; S = significant;

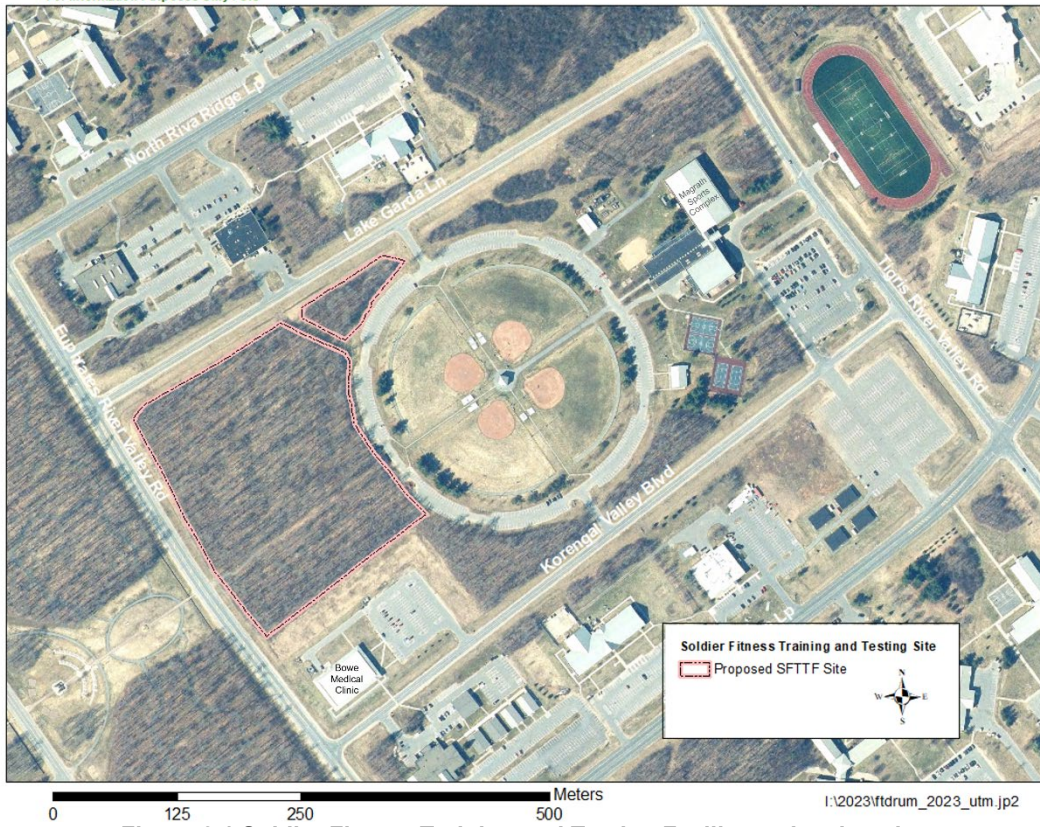


Figure 2.1 Soldier Fitness Training and Testing Facility project location

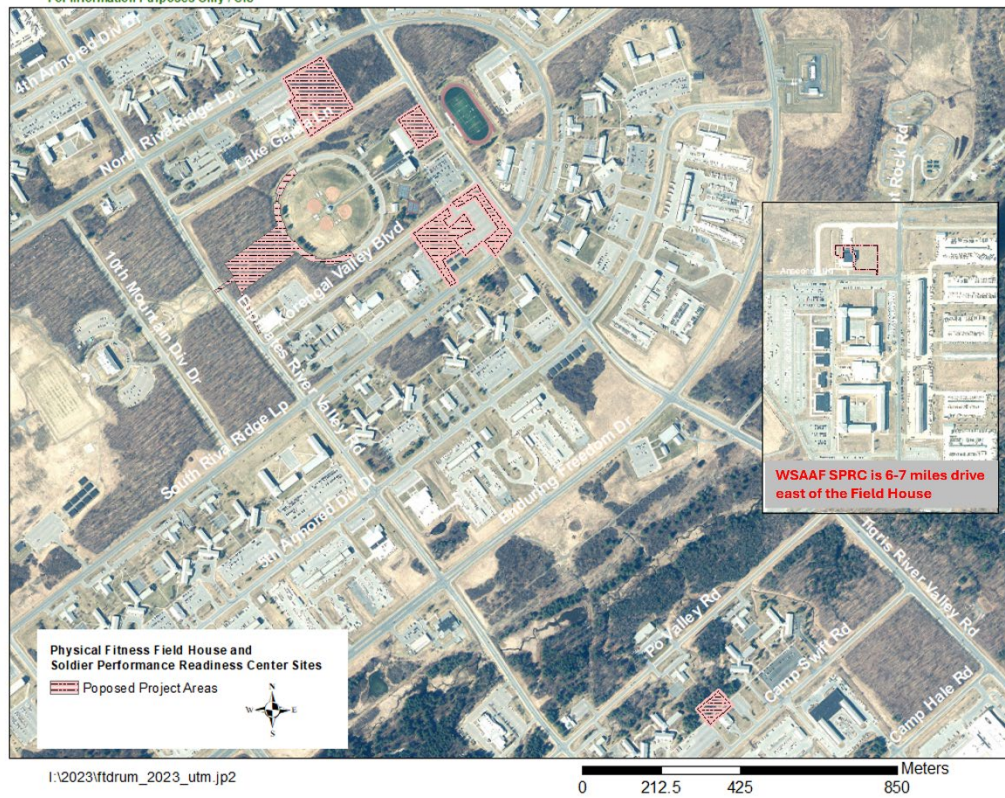


Figure 2.2 Field House and SPRC location

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Fort Drum is a 108,733-acre Army installation in northern New York State that lies within Jefferson and Lewis Counties and is adjacent to St. Lawrence County, New York. The northeastern portion of the installation includes the western portion of the Adirondack Mountains of New York State (U.S. Army, 2022). The Cantonment¹ Area is approximately six miles east of Interstate Highway 81 and 10 miles northeast of the City of Watertown. Fort Drum is served by several state roads and has an extensive local road network. Most of the installation extends northeastward from the Cantonment Area, averaging 10 miles wide and 20 miles long. Lake Ontario is approximately 20 miles west of the installation, and the St. Lawrence River is about 20 miles to the north. Fort Drum is the largest military installation in the northeast United States.

3.1 Air Quality

The affected environment includes air quality. Air emissions associated with this project at Fort Drum are expected from land clearing, construction, and operations activities. These emissions will be temporary and short term. Fort Drum is currently in attainment for all criteria pollutants (Whitman, 2024 and EPA, 2024).

Actual emissions from stationary sources at Fort Drum fall below the thresholds for major source determination. Potential emissions from stationary sources at Fort Drum exceed the Major Facility threshold for CO, NO_x, SO₂, and VOCs. Because permitting requirements are determined based on a facility's "potential to emit," Fort Drum is considered a major facility and operates in accordance with an approved Title V permit. Since Fort Drum is a major source, the General Conformity Rule of the Clean Air Act applies. The general conformity rule requires analysis of total direct and indirect emissions of criteria pollutants, including precursors, when determining conformity of the proposed action. The rule does not apply to actions where the total direct and indirect emissions of criteria pollutants are at or below established *de minimis* levels. A Record of Non-Applicability (RONA) is required to document the calculations and determination that the projected/potential emissions of criteria pollutants do not exceed the *de minimis* thresholds. The project may need modifications or mitigation strategies to bring it into compliance.

The proposed action is to build a 83,000 square foot facility with parking areas, supporting utilities, site improvements (walkways, landscaping, etc.), access roadways, signage and environmental protections (stormwater retention, oil/water separators, etc.) on an ten to twelve acre parcel of forest land. This action has the potential to increase VOC and NO_x emissions due to ground clearing, the potential operation of new stationary equipment (e.g. boiler, furnace, generator) and an expected increase in vehicular commuting associated with the facility. VOC and NO_x emissions resulting from each proposed action must be estimated and compared to general conformity de

¹ Cantonment Area is the portion of an Army Installation that is comprised of permanent facilities for housing, recreation, and dining, exchanges (stores, restaurants, fuel stations), barracks, offices, headquarters facilities, equipment staging and maintenance areas, indoor ranges, training classrooms, and airfields, etc.

minimis thresholds for Jefferson County, NY. Actions with actual emissions that are below thresholds have no further regulatory obligations under the general conformity rule. However, emission calculations and the resulting comparison to applicable thresholds are required by Army policy to be documented in a written Record of Non-Applicability (RONA) and retained in administrative records to demonstrate that general conformity applicability was considered.

3.1.1 Environmental Consequences: Air Quality

Recent construction of projects similar in size and scope as the SFTTF at the installation have had temporary short-term impacts to air from the land clearing, construction, and operations. The same is expected for construction of the SFTTF with the impacts being low and short-term and predominantly from earth moving equipment and ground disturbance.

Neither the proposed action nor the alternatives would have potential for long-term adverse effects to air quality. In accordance with the General Conformity Rule a Record of Non Applicability for the projected use of vehicles, equipment, and generators will be prepared and approved before the start of ground disturbance and throughout construction.

3.2 Biological Resources:

Biological resources consist of the plants and animals in an area. The variable assemblage of interacting plant and animal populations that share a common environment make up an ecological community. At Fort Drum, there are various ecological communities which include both native and introduced plants and animals. Detailed information regarding types of vegetation communities, wildlife, fish species can be found in the Fort Drum Integrated Natural Resources Management Plan (INRMP) (USAG Fort Drum, 2024a).

3.2.1 Vegetation (Flora)

Although no federally listed endangered plants have been documented on Fort Drum, there at least 15 state-listed plants and nine are aquatic species. The best available status information is from the New York Flora Atlas web site at <http://newyork.plantatlas.usf.edu/default.aspx>. These species include *Cynoglossum virginianum* var. *boreale*, *Diphasiastrum complanatum*, *Boechera stricta*, *Carex houghtoniana*, *Solidago rigida* var. *rigida*, and *Ulmus thomasii*. (USAG Fort Drum, 2024a).

3.2.2 Wildlife (Fauna)

A multitude of diverse and relatively undeveloped habitat types provide habitat for a variety of wildlife animals within this region of New York. Various surveys have confirmed the occurrence of 49 mammals, 252 birds, 42 fish, 15 reptiles, and 22 amphibian species on the installation. Invertebrates have not been adequately surveyed on Fort Drum to determine the number of species, although formal surveys for

Odonates [dragonflies and damselflies], sand wasps and moths, and informal and opportunistic inventories for other insects have documented more than 1000 species. (USAG Fort Drum, 2024a).

The proposed construction sites are located in highly developed and intensely used areas of the Installation. Common fauna species that can be found in Cantonment Area forests internal to developed areas include white-tailed deer, bats, squirrel, woodchuck, racoon, striped skunk, porcupine, red/grey fox, domestic/feral cat, and possibly coyote, birds, reptiles and amphibians.

3.2.3 Threatened and Endangered Species

The federal and state endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) and the tricolored bat (*Perimyotis subflavus* -proposed endangered) and their habitat are present on Fort Drum. There is no Critical Habitat designated on Fort Drum or anywhere else in New York State for the Indiana bat. An Indiana bat summer maternity colony is known to exist in the Cantonment Area.

In 2011 an approximate 2200-acre Bat Conservation Area (BCA) was established to protect Indiana bat roosting and foraging areas from development. Located in the Cantonment Area, Training Area 3, and Training Area 4, the BCA encompasses a large area of habitat, where management can maintain minimal land clearing controls inside the BCA.

As part of Endangered Species Act Section 7 consultation with the U.S. Fish & Wildlife Service (USFWS), Fort Drum completed a three-year installation-wide Biological Assessment (BA) to consider all activities that may impact the Indiana Bat including construction. There are approximately 125 new projects anticipated for construction on up to 400 acres in the Cantonment from January 2024 to December 2026. All appropriate conservation measures will be followed to minimize any potential impacts. These projects are described in the current BA. Between 2009 and 2023, Fort Drum anticipated constructing on approximately 4390 ac of land in and around the Cantonment Area and the Wheeler Sack Army Airfield (WSAAF). During these 14 years, approximately only 738 ac were actually cleared for construction, as of July 2023. This included the loss of approximately 456 ac of natural vegetation. The remaining approximately 281 ac were on already disturbed and/or developed land. ((USAG Fort Drum, 2023).

This project is accepted by the terms of the USFWS Letter of Concurrence received for actions proposed to occur from 2024-2026. The approximate ten to twelve acre site identified for the SFTTF facilities represents a small percentage of the expected development at the installation. There are numerous conservation measures, limitations and conditions, and reasonable and prudent measures in place and outlined in the BA to ensure the bat population and habitat on Fort Drum is not jeopardized.

3.2.4 Environmental Consequences: Biological Resources

The proposed SFTTF project site could impact ten to twelve acres of forested area within the Cantonment Area of Fort Drum. Clearing the vegetation from this site would cause mammals and birds that frequent this area to relocate to the surrounding forest. The project site is located outside of the BCA where land clearing for construction is permitted within certain restrictions, such as felling trees for land clearing being permitted from 15 October to 15 April to avoid taking a roosting bat or a nesting bird (an Installation best management practice). Although the proposed project site is a forested area that potentially could be bat habitat, no bats have been documented roosting or foraging in this area. The nearest Indiana bat roost to the project site is approximately 2000 meters from the project site and is already protected by the BCA.

3.3 Land Use

Construction of the SFTTF would occur on an existing active Army training installation. At this time, there are no plans to change the current use of the property contained within Fort Drum. The parcel preferred for the proposed action is classified as a closed canopy deciduous forest. This is a forest where the dominant species of trees and other woody vegetation that make up the forest are species that shed their leaves during the cold months of the year and re-grows new leaves the next spring in time for the growing season.

Construction of the SFTTF could remove ten to twelve acres of the approximately 997 to 1000 acres of this forest type from the Cantonment Area (Ganter, 2024). Clearing vegetation will occur within the timeframe established for felling trees (an installation best management practice) ensuring the clearing is carried out when there a low risk of active nesting occurring in the area.

3.3.1 Environmental Consequences: Land Use

Neither the proposed action nor the alternatives is anticipated to have any significant adverse effects on Fort Drum or the surrounding area of the Installation.

3.4 Soils

Soils of Fort Drum are generally developed from deltaic/lacustrine or glacial deposits. These soil types vary from sandy gravels to loams to clays to mucks. Soils in the region are generally shallow and poorly drained; soil permeability is slow to moderate.

There are 193 different soil types mapped on Fort Drum. Three of these are located at or around the project site. The soils at the preferred location include Amenia loam (AmA) - Nearly level 1-3% slopes, very deep, moderately well drained soil; Amenia loam (AmB) - Gently sloping 3-8% slopes, deep, moderately well drained soil; and Nellis loam (NIB) - Gently sloping, very deep, well drained soils. Soils at this location are predominantly undisturbed.

A Stormwater Pollution Prevention Plan (SWPPP) is required to start construction SWPPP are reviewed and approved by NYSDEC, and activities are monitored during

and after construction to ensure the requirements of the SWPPP and best management practices for erosion and soil controls are followed.

3.4.1 Environmental Consequences: Soils

While there is expected minor short-term impacts to soils during subsurface site investigations neither the preferred action nor its alternatives would have potential for long-term adverse effects to soils.

3.5 Climate

Fort Drum has a primarily humid, continental climate with relatively long, cold winters and short, warm and often humid summers.

Temperatures fall below 0°F (-17.8 °C) approximately 20 days during December – February; below-freezing temperatures occur approximately 104 days from December – March. With slightly higher elevations and a greater distance from Lake Ontario, the northeastern part of the installation has winter temperatures 2 - 4 °F lower than those recorded at WSAAF. Wind chills cause winter temperatures to feel much colder. The mean annual wind velocity on Fort Drum ranges from 6 -11 knots.

The mean annual precipitation on Fort Drum is about 41 in (104 cm), and precipitation is well distributed throughout the year. The record-high annual precipitation was 55.4 in (140.7 cm) in 1972, and the record-low annual precipitation was 26.96 in (68.5 cm) in 1908 (USACE 1977). Snowfall is fairly heavy, with an annual average of 109 in (276.9 cm) at Fort Drum. However, snowfall is quite variable, not only from year to year but also from place to place as a result of slope, elevation, and other factors. Snow cover can be several feet deep from December through March. (USAG Fort Drum, 2024a).

3.5.1 Environmental Consequences: Climate

Training to the new Army Standards for Soldier Fitness Training and Testing is challenging during the relatively long, cold winters that Fort Drum experiences. When training outside is impacted by severe inclement weather conditions, risking Soldiers and trainers exposure to extended sub-zero temperatures, ice, and heavy snow, and impacts the ability to train or test to the Army Standard the solution is to move the training indoors. Failing to provide adequate facility to perform Holistic Health and Fitness is detrimental to the Soldiers health and wellbeing.

3.6 Socioeconomics, Environmental Justice, Protection Of Children

Socioeconomics concerns the population and economic activity within the three counties in and around Fort Drum: Jefferson, Lewis, and St. Lawrence. This section addresses the potential impacts a proposed project would have on the social and economic conditions of the three county area, positively or negatively. Environmental Justice requires identification of the potential for disproportionate impacts on minority and low-income populations, and Protection of Children requires identification of environmental health risks and safety risks that may disproportionately affect children.

3.6.1 Environmental Consequences: Socioeconomics, Environmental Justice, and Protection of Children

It is expected there will be beneficial impacts from construction, operation, and maintenance of facilities. These activities increase jobs, both short-term from construction, and long-term for operations and maintenance, and can have positive impacts to area populations and suppliers of goods and services. Neither the preferred action or the alternatives are likely to have significant adverse effects on Fort Drum or the surrounding area of the Installation

Considering the preferred action or alternatives are within the installation boundary for the purpose to provide state of the art indoor physical fitness testing and physical therapy and care to Soldiers, it is not expected these actions would have significant adverse effects or disproportionate impacts on minority and low-income populations or have environmental health risks and safety risks that disproportionately affect children.

4.0 CUMULATIVE IMPACT

A cumulative effect is defined as an effect on the environment that results from the incremental effect of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency or person undertakes these actions. Cumulative effects can result from individually minor but collectively significant actions taking place locally or regionally over a period of time.

Construction of the SFTTF is proposed to occur on an existing active Army installation. At this time, there are no plans to change the current use of the property contained within Fort Drum. The construction and operation of a SFTTF would not cause an appreciable increase or decrease in the number of troops using the installation. The Preferred Alternative is not anticipated to have significant immediate or long-term effects on Fort Drum or the surrounding area of Installation.

Cumulatively this action could remove up to twelve acres of forest from the Cantonment Area. Clearing and Grubbing of the land will occur at a time when there a low chance of active nesting occurring in the area.

5.0 FINDINGS AND CONCLUSIONS.

Construction and operation of the SFTTF at the Preferred Alternative location at Fort Drum would not result in significant environmental or socioeconomic impacts. Army, Federal and State laws and regulations, management plans, environmental requirements, and best management practices implemented by Fort Drum would ensure activities are following all applicable federal and state laws, regulations, policies and Army guidelines. All activities that occur on the installation are reviewed by the Installation's Environmental Division including Natural Resources Management, Compliance Management and the Cultural Resources Management programs, for

guidance and when necessary, provide information to help avoid, minimize, and/or mitigate impacts.

As a result of the analyses performed by this EA, it is determined that the known and potential impacts of the Preferred Action and Alternatives, on the physical and socioeconomic environment, would not be significant. All projects are subject to funding, mission priorities, and other factors, and although 250 projects are proposed for the next three years, it is not known how many will actually be constructed. Based on the analysis and findings in this EA it is recommended that the Preferred Alternative be advanced to approval and a Finding of No significant Impact (FONSI) be prepared to document the decision.

6.0 List of Preparers.

Cait Schadock, NEPA Program Manager, Fort Drum, Environmental Division; BA, 1983, Anthropology/Biology, State University of New York, Potsdam, New York; Years of Experience: 35

7.0 Agencies and Persons Consulted.

Jeffrey Carroll	Fort Drum Directorate of Public Works (DPW) Engineering Plans & Services Division (EP&S), Master Planning
Chris Dobony	Fort Drum, DPW Environmental Division Fish & Wildlife Biologist (ESA)
Jason Wagner	Fort Drum, DPW Environmental Division Chief Natural Resources Branch
Travis Ganter	Fort Drum DPW Environmental Division, Forester
Christopher Whitman	Fort Drum, DPW Environmental Division Air Quality Program Manager

8.0 References.

Ganter, 2024. Travis Ganter, Installation Forester, Environmental Division Natural Resources Branch, Fort Drum. Personal communication, email, September 2024. Re: confirming acreage of land cover type.

Whitman, C. 2024. Christopher Whitman, Air Quality Program Manager, Environmental Division Compliance Branch, Fort Drum. Personal communication, email, September 2024. Re: request to validate Installation CAA attainment or non-attainment status.

EPA, 2024. Environmental Protection Agency (EPA) Greenbook for Nonattainment Areas for Criteria Pollutants. Last updated on August 31, 2024. Accessed September 09, 2024 <https://www3.epa.gov/airquality/greenbook/ancl.html>

US Army Garrison (USAG) Fort Drum. 2024a. *Fort Drum Integrated Natural Resources Management Plan (INRMP)*. Natural Resources Branch, Environmental Division, Directorate of Public Works, Fort Drum, New York. <https://fortdrum.isportsman.net/publications.aspx>

USAG Fort Drum, 2024b. *Implementing Instrument for Endangered Species Act Consultation Requirements for Federally-Endangered Bat Species on Fort Drum Military Installation*. Prepared by U.S. Army Garrison Fort Drum Fish & Wildlife Management Program Environmental Division, Directorate of Public Works. March 2024.

USAG Fort Drum, 2023. *Biological Assessment on the Proposed Activities On Fort Drum Military Installation, Fort Drum, New York (2024-2026) for the Indiana Bat (*Myotis sodalis*), Northern Long-Eared Bat (*Myotis septentrionalis*), and Tricolored Bat (*Perimyotis subflavus*)*. Prepared by U.S. Army Garrison Fort Drum Fish & Wildlife Management Program Environmental Division, Directorate of Public Works. September 2023.

US Fish and Wildlife Service (USFWS) Letter (Concurrence with determinations of the Fort Drum Biological Assessment). 12 December 2023.

US Army, 2023. *Fort Drum Economic Impact Statement, Fiscal Year 2010, October 1, 2022 - September 30, 2023*. United States Department of the Army. April 2024.

U.S. Army, 2022 *Programmatic Environmental Assessment for Multi-Domain Task Force Stationing*. Prepared for Headquarters Department of the Army. September 2022

US Army, 2012. *Environmental Assessment for Construction and Operation of a Soldier and Family Care Clinic at Fort Drum, NY*. Prepared by the Directorate of Public Works Environmental Division Natural Resources Branch, Fort Drum, NY. March 2012.

US Army, 2011. *Environmental Assessment (EA) for Stationing Actions to Support the Grow the Army Initiative at Fort Drum, NY*. Prepared by the Environmental Planning Branch Environmental Quality Programs Division US Army Environmental Command, San Antonio TX, for the Directorate of Public Works Environmental Division Natural Resources Branch, Fort Drum, NY. February 2011.

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APPENDIX A

CORRESPONDENCE

BA, Letter to U.S. Fish & Wildlife Service

Concurrence Letter from U.S. Fish & Wildlife Service on the Fort Drum Biological Assessment.

Cultural Resources, Letter of No Effect.

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REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM
10000 10TH MOUNTAIN DIVISION DRIVE
FORT DRUM, NEW YORK 13602-5000

September 12, 2023

Environmental Division
Public Works

Mr. Ian Drew
United States Fish & Wildlife Service
New York State Field Office
3817 Luker Rd
Cortland, New York 13045

Dear Mr. Drew:

Enclosed is Fort Drum's 2024-2026 Biological Assessment on the proposed activities on Fort Drum Military Installation for the Indiana bat, northern long-eared bat, and tricolored bat.

After reviewing all of the proposed activities, Fort Drum has determined that by following the project descriptions and the conservation measures proposed, there should be no activities within the next three years that are likely to adversely affect Indiana or northern long-eared bats on Fort Drum. Fort Drum has also determined that only in-season clearing for small scale range construction projects and the use of smoke/obscurants is likely to adversely affect tricolored bats on Fort Drum. All other proposed activities on Fort Drum will not affect, or may affect, but should not adversely affect tricolored bats.

Please note that some supporting documentation for this Biological Assessment (e.g., Appendices) can be found at the provided websites or has been previously provided to your office. Some of the Appendices are preliminary reports and should only be used for internal US Fish and Wildlife Service use, unless specifically discussed with Fort Drum.

If you have questions, please contact Chris Dobony, Fort Drum Fish & Wildlife Biologist, at 315-778-6348 or Christopher.A.Dobony.civ@army.mil.

Sincerely,

MILLERJAM Digitally signed by
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James M. Miller
Chief, Environmental Division
Public Works

Enclosures

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
3817 Luker Road
Cortland, New York 13045



January 30, 2024

James Miller
Chief, Environmental Division, Public Works
Department of the Army
U.S. Army Installation Management Command
Headquarters, United States Army Garrison, Fort Drum
10000 10th Mountain Division Dr.,
Fort Drum, NY 13602-5000
james.m.miller352.civ@army.mil

Dear James Miller:

This letter is in response to your September 12, 2023, letter and January 3, 2024, electronic mail, regarding proposed activities on the Fort Drum Military Installation (Fort Drum), Jefferson County, New York, over the next three years. The U.S. Fish and Wildlife Service (Service) received your Biological Assessment (BA) on September 12, 2023. We understand that the U.S. Army (Army) is the lead federal agency for all activities on Fort Drum, and that the Army will coordinate with all other agencies and project sponsors to ensure all conservation measures are followed. The BA evaluated the following categories of activities that are anticipated to occur within the action area between 2024-2026: construction, military training, forest management, mechanical vegetation management, land conversion, use of pesticides, wildlife management/vertebrate pest control, outdoor recreation, and conservation activities that include activities within the Bat Conservation Area, monitoring and research, outreach efforts, and the Army Compatible Use Buffer program.

Pursuant to Section 7(a)(2) of the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*), the Army determined that all proposed activities addressed in the BA "may affect, but are not likely to adversely affect," the federally listed Indiana bat (*Myotis sodalis*; Endangered; IBAT) and the northern long-eared bat (*Myotis septentrionalis*; Endangered; NLEB). Given the project description, the extensive monitoring information for bats present at Fort Drum, our joint experience with similar work conducted over the past 15 years, and the Army's implementation of conservation measures listed in the BA (Appendices X and Y, pp. 71–85), the Service concurs with this determination for the IBAT and NLEB.

Fort Drum also requested to conference with the Service on the tricolored bat (*Perimyotis subflavus*; Proposed Endangered; TCB). While there is no requirement to consult with the

Service regarding species proposed for listing, Fort Drum proactively assessed the potential impacts of all their activities on TCBs and proposes to include the conservation measures outlined in the BA for the IBAT and NLEB, to also protect TCBs. Fort Drum determined that all proposed activities included in the BA “may affect, but are not likely to adversely affect” the TCB, with the exception of small-scale construction projects and the use of smoke and obscurants. Fort Drum made a “may affect, likely to adversely affect” determination for these two activities given the uncertainties of potential adverse impacts to the TCB that may occupy suitable habitat where these activities may occur. However, over a video conference on January 3, 2024, Fort Drum and the Service further discussed potential adverse impacts and because only one TCB has been documented in a nearby hibernaculum, summer acoustic surveys on Fort Drum have documented very low numbers of TCBs, and the implementation of conservation measures, no adverse impacts are anticipated. Fort Drum subsequently made a “may affect, not likely to adversely affect” determination for the two activities in an electronic mail dated January 3, 2024. The Service concurs with this determination for the TCB. If the TCB is federally listed, then Fort Drum will need to confirm the Service’s concurrence to receive future ESA Section 7(a)(2) concurrence when the final listing rule becomes effective. The Service will provide technical assistance if and when confirmation on this concurrence is needed.

We understand that the Army will continue to submit an annual monitoring report summarizing activities conducted on Fort Drum and the implementation of all conservation measures for the IBAT, NLEB, and TCB. No further coordination or consultation under the ESA is required at this time. Should the Army (or any other federal agency or project sponsor on Fort Drum) propose any projects not addressed in the BA, or any new information on listed or proposed species on Fort Drum become available, further consultation between the Army and the Service may be required.

Thank you for your continued efforts to conserve not only the federally listed and proposed bat species, but all bat species that may be using various habitats on Fort Drum. Should you have any questions, please contact Steve Kendrot by email at stephen_kendrot@fws.gov or at 607-753-9334. Future correspondence with us on this project should reference project file 2024-0030032.

Sincerely,

IAN DREW

Digitally signed by IAN DREW
Date: 2024.01.30 13:01:28
-0500

Ian Drew

Field Supervisor

*Additional information referred to above may be found on our website at:

<https://www.fws.gov/office/new-york-ecological-services-field/new-york-project-reviews>

cc: NYSDEC, Watertown, NY (andrew.macduff@dec.ny.gov)
NYSDEC, Albany, NY (angelena.ross@dec.ny.gov; ashley.meyer@dec.ny.gov)
Army, Fort Drum (jason.e.wagner.civ@army.mil; christopher.a.dobony.civ@army.mil)
USACE, Watervliet, NY (amy.l.gitchell@usace.army.mil)



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HEADQUARTERS, UNITED STATES ARMY GARRISON
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FORT DRUM, NEW YORK 13602

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16 DEC 2024

MEMORANDUM FOR NEPA

SUBJECT: PN 94116 Soldier Fitness Training and Testing Facility

1. The proposed Soldier Fitness Training and Testing Facility project footprint located adjacent to the Truman Cool Memorial Ball Field Area has been reviewed by the Fort Drum Cultural Resources Program.
 2. The proposed project area was part of the area surveyed by Louis Berger & Associates in preparation for construction of the new cantonment and re-activation of the Tenth Mountain Division. Consultation for the proposed project area was completed in 1987 which included farmstead data recovery as a form of mitigation for any future loss of cultural material related to historic farmsteads on Fort Drum.
 3. In addition, the current cultural resources archaeology team reviewed the proposed project area which is considered moderate to low sensitivity for prehistoric cultural material and found no evidence for potential cultural remains.
 4. It is the determination of the cultural resources program that construction of the proposed soldier fitness training and testing facility on the proposed footprint will have no adverse effect on the cultural resources of Fort Drum.
3. The point of contact for this action is Dr. Laurie Rush, Cultural Resources Manager, (315) 772-4165, laurie.w.rush.civ@army.mil.

Laurie Rush, Ph.D, RPA, FAAR
Cultural Resources Program Manager

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APPENDIX B

DRAFT FINDING OF NO SIGNIFICANT IMPACT

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FINDING OF NO SIGNIFICANT IMPACT

Construction and Operation of a *Soldier Fitness Training and Testing Facility (SFTTF)* at Fort Drum, New York

The Environmental Assessment (EA) documents the results of a study of the potential impacts to the natural and human environment from the construction and operation of a Soldier Fitness Training and Testing Facility (SFTTF) to accommodate year round fitness training and testing and H2F Soldier care at Fort Drum, New York.

This study was conducted pursuant to the requirements of the National Environmental Policy Act (NEPA) of 1969 [42 United States Code, 4321 et seq.], the Council on Environmental Quality (CEQ) Regulations [40 Code of Federal Regulations (CFR) 1500-1508], and 32 CFR Part 651 (a.k.a. Army Regulation (AR) 200-2), Environmental Analysis of Army Actions, Final Rule, 29 March 2002. The purpose of this study was to determine the extent of potential environmental impacts from the proposed action and to decide whether or not those impacts are significant, thereby warranting a more detailed study of possible impacts, mitigation, and alternative courses of action.

The analysis of impacts (or consequences) of the proposed action was based on information about the affected environment on and around the Fort Drum Army Installation. The analysis involved the review of installation natural resources-related data collected by Fort Drum, by other governmental agencies, and private organizations, and discussions with Fort Drum personnel involved with natural resources management, facilities master planning, cultural resource management, and operations & maintenance.

Fort Drum proposes to construct and operate a consolidated Soldier Fitness Training and Testing Facility to support required testing the Army Combat Fitness Test (ACFT) and provide dedicated space for the weekly training designed to generate lethal Soldiers who are physically fit and mentally tough to engage with and overmatch the enemy in multi-domain operations. The facility concept is for it to have a large clear span room with an artificial turf field, consultation/assessment/therapy rooms or spaces, an admin office area, bleachers, running track, bathrooms, lockers, and showers.

This EA considered three alternatives. Alternative 1 - The Preferred Action Alternative is to construct and operate a consolidated Soldier Fitness Training and Testing Facility (SFTTF) to accommodate multiple Brigades, be centrally located in the Cantonment and near the Brigades and is supplied and staffed to support multiple functions in one facility for larger number of Soldiers. Alternative 2 - Sites Considered Action Alternative is to construct a Physical Fitness Testing Facility Field House (Field House) and multiple Soldiers Performance Readiness Centers (SPRC) in vicinity of each Brigade and is supplied and staffed to support each Brigade. This alternative could include five or more separate construction sites. The location for the Field House is the same location as Alternative 1 with a smaller footprint. The locations of the SPRC are located in vicinity of the Brigade Headquarters area footprints in the east side of the North Post, Central Post, and Wheeler Sack Army Airfield. Alternative 3 - The No Action is to continue Soldier Readiness Training and Testing in existing facilities that cannot accommodate large numbers of soldiers and to continue to be impacted by severe inclement weather conditions, risking exposure to extended sub-zero temperatures, ice, and heavy snow, and impacts the ability to train or

test to the Army Standard. This alternative would fail to provide adequate physical fitness and holistic health support and underserve Soldier health and wellbeing. No other alternatives were analyzed for this EA.

Constructing the SFTTF will benefit the Soldier and enhance the quality of training and medical care afforded them. As a result of initial scoping for this assessment, it has been determined that the action will have no effect on certain resource areas that frequently receive attention in NEPA analyses. Resource areas that were considered but excluded from further detailed analysis in this EA include: airspace, climate, cultural resources, geology (except soils), hazardous materials / hazardous wastes, infrastructure (potable water supply, electricity, wastewater treatment, HVAC (heating, ventilation, and air conditioning), noise, telecommunications, traffic and transportation, solid waste (disposal, roadways), socioeconomic conditions, environmental justice (effects on low-income and minority populations), protection of children from environmental health and safety risks, water resources, and wetlands. The proposed action will have no measurable changes in local or regional employment or other economic indicators.

This EA addresses potential impacts to resources, such as air, biological resources (vegetation, wildlife, threatened and endangered species), land use, and soils. The EA was prepared utilizing a systematic, interdisciplinary approach integrating the natural and social sciences with planning and decision-making.

After careful review of the potential impacts of the alternatives, it is concluded that Alternative 1 would not have a significant adverse impact on the quality of the human or natural environment as long as measures summarized in the EA are implemented properly. The proposed action has minimal potential for irreversible or irretrievable commitment of natural resources by either actions and or cumulative effects. Because there would be no significant environmental impacts resulting from implementation of the proposed action, an Environmental Impact Statement is not required and will not be prepared. This analysis fulfills the requirements of the NEPA and associated Council On Environmental Quality regulations, as well as requirements of 32 CFR Part 651 (AR 200-2), Environmental Analysis of Army Actions.

A public notice was published in the December 18, 25, 2024 and January 8, 2025 editions of the Watertown Daily Times newspaper to announce the availability of this EA for a 30-day public comment period. Copies of the EA and the Draft Finding of No Significant Impact were made available for review online at <https://home.army.mil/drum/about/fort-drum-environmental-assessments>. Comments were received through January 17, 2025

Matthew R. Myer
Colonel, IN
Garrison Commander

Date