

Enhanced Sustainability



2021 Annual Report

Fort Lee

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List of Acronyms

| | |
|--------|---|
| AR | Army Regulation |
| BMP | Best Management Practice |
| BRAC | Base Realignment and Closure |
| CBPA | Chesapeake Bay Preservation Act |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| CSA | Confederate States of America |
| EA | Environmental Assessment |
| EIS | Environmental Impact Statement |
| EMD | Environmental Management Division |
| EO | Executive Order |
| EPA | Environmental Protection Agency |
| ICRMP | Integrated Cultural Resources Plan |
| INRMP | Integrated Natural Resources Plan |
| IPMP | Integrated Pest Management Plan |
| ITAM | Integrated Training Area Management |
| MI-EMS | Mission Integration-Environmental Management System |
| NAAQS | National Ambient Air Quality Standards |
| NEPA | National Environmental Policy Act |
| NLEB | Northern Long-Eared Bat |
| NMP | Nutrient Management Plan |
| PCB | Polychlorinated Biphenyl |
| QTR | Qualification Training Range |
| RCMP | Range Complex Master Plan |
| REC | Record of Consideration |
| RPA | Resource Protection Area |
| SI | Site Investigation |

| | |
|--------|--------------------------------|
| SF | Square Foot |
| SOP | Standard Operating Procedures |
| TA4 | Training Area 4 |
| TMDL | Total Maximum Daily Load |
| TRADOC | Training Doctrine Command |
| TSF | Training Support Facility |
| VEC | Valued Environmental Component |

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Introduction

Welcome to the 2021 Fort Lee Enhanced Sustainability Annual Report

Perhaps you live and/or work at Fort Lee, are a stakeholder from the surrounding community, or have some other interest in the sustainability efforts being taken by Fort Lee. Whatever your reason for reading this document you are sure to find helpful information regarding the status of the important features of your environment that allow Fort Lee to serve you as a premier Army installation with the essential mission of training and supporting our nation's soldiers.

Each time an activity or action needs to take place at the installation, the consideration of how it will affect the environment and community must be assessed. In 1969, the National Environmental Policy Act (NEPA) was passed requiring federal agencies to consider environmental outcomes and effects in their decision-making. The Army implements NEPA through its own procedures called Environmental Analysis of Army Actions as documented in Title 32 of the Code of Federal Regulations (CFR) Part 651. The regulation strongly encourages public participation to ensure all concerns and issues are considered in decision-making.

When Fort Lee needs to take an action, for example, construct a new barracks building, the NEPA process is used to determine if any



environmental or socioeconomic impacts will occur during the construction and upon completion of the building. It looks at both immediate impacts as well as cumulative impacts that may not be noticeable until long after the action is complete or that may be impacted as a result of other projects on Fort Lee or in the local area. The types of environmental and socioeconomic topics assessed are called valued environmental components, or VECs. VECs are the types of environmental and socioeconomic resources whose harm would be measurable if the action taken negatively impacted them. Fort Lee-specific VECs include:

The U.S. Army Environmental Command's NEPA Analysis Guidance Manual identifies

14 selected VECs that should be evaluated during the NEPA process. They are:

1. Air Quality
2. Airspace
3. Cultural Resources
4. Government Services
5. Hazard, Toxic, & Radioactive Substances
6. Noise
7. Socioeconomics
8. Infrastructure
9. Land Use
10. Traffic and Transportation
11. Water Resources
12. Soil Erosion
13. Threatened and Endangered Species
14. Wetlands

Normally when an action, such as building construction, is planned, an individual assessment is performed to determine if the action will have an effect on any of the VECs. Often, the results of the assessment indicate there would be no significant effect if the construction is performed as planned. Given the number of actions that occur each year (not just construction, but any action, such as a change in range activities or a plan to schedule night-time training exercises using helicopters), the number of assessments can add up very quickly and the need to document this process is expensive and time consuming; all that cost incurred to learn what was already suspected from the beginning of the initial planning of the project that there will be no impact to the VECs.

Purpose

The purpose of this Enhanced Sustainability Annual Report is to provide an alternative way to document the state-of-the-environment at Fort Lee and use it in place of the full NEPA process where applicable. A companion

document called the Capacity Analysis Report contains established baseline information and criteria for determining significance, which provides the tools to determine significance for each VEC based upon the context and intensity of the proposed action. If a significant impact is anticipated, then project-specific NEPA analysis and documentation will be required. If no impact is anticipated, then the analysis of the proposed action performed using the Capacity Analysis Report may be documented using a Record of Environmental Consideration (REC).

Tool of the Trade

The Capacity Analysis Report is the main tool used to perform project analysis. It contains the following information for each VEC:

- Individual VEC Baseline Information
- Categorical Exclusion Information
- Current Compliance Activities
- Criteria for Determining Significance

How To Use This Report

This annual report will be provided for public comment and be made readily available for public and regulatory viewing by upload to the Fort Lee public website:
<http://www.lee.army.mil/dpw/emd/documents.review.aspx> .

If a new, unplanned action is added sometime throughout the year, the Capacity Analysis Report will be used to perform analysis and determine if the new action will significantly



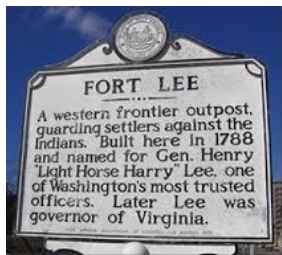
impact any of the VECs. If yes, project-specific NEPA analysis and documentation will be required. If no immediate or cumulative impact is anticipated, then a REC will be written with reference that the Capacity Analysis Report was used to determine that no impact will occur.

32 CFR Part 651.10, where the Army defines a REC in its NEPA implementation regulations, states that a REC is a “signed statement that briefly describes a proposed action, and documents that the action has received NEPA review. RECs are required when a categorical exclusion applies and to “describe how a prior completed NEPA document applies to the current proposed action such that the proposed action has already been adequately analyzed in a completed NEPA document”. It also states that “RECs may include by reference relevant and readily available documents”.

The Capacity Analysis Report is specifically written to serve as a tool by which Army actions may be analyzed for NEPA consideration. Each year it will be updated and presented for public and regulatory viewing along with this document. It will be used as the existing reference document for each REC written when no significant impact is anticipated.

Installation History

Camp Lee was activated in 1917 and served as a state mobilization and training center during World War I. Immediately after the war, Camp Lee was used for demobilization and deactivated at the end of 1919. After deactivation it became a wildlife preserve until 1940. It was reactivated in 1941 as a quartermaster training center and school. In 1950 it received permanent status and was named Fort Lee. During the 1950s permanent facilities were added and airborne logistics



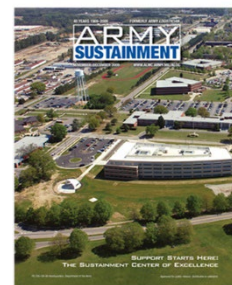
training and petroleum training commenced.

During reorganization of the US Army in 1962, Fort Lee was designated a Class 1 military installation under the Second United States Army and was renamed the US Army Quartermaster Center and Fort Lee. In 1966 the Second United States Army was inactivated and Fort Lee became a Class 1 military installation under the First United States Army. In 1973 Fort Lee became a major Army Subcommand under the control of Army Training and Doctrine Command (TRADOC). In 1988 the US Army Quartermaster Center and Fort Lee was re-designated the US Army Logistics Center (Provisional) and Fort Lee. During the 1990 reorganization of TRADOC, Combined Arms Support Command (CASCOM) and Fort Lee was



established from the merger of combat development and training development.

Fort Lee is currently the home of the Sustainment Center of Excellence, a major subordinate command of the TRADOC. In addition, it houses the aforementioned Combined Arms Support Command, the Army Logistics University, the U.S. Army Ordnance School, the U.S. Army Quartermaster School and the U.S. Army Transportation School. Its tenants include headquarters elements of the Defense Commissary Agency, Kenner Army Health Clinic, a Military Entrance Processing Station and the Defense Contract Management Agency. Fort Lee is located in Prince George County, Virginia (VA), south of the city of Hopewell and northeast of the city of Petersburg. The total area encompassed by Fort Lee is 5,907 acres; half of this area has been developed and the remaining half is forested.



Fort Lee Sustainability Program and Goals

Recent years have seen the development of a new level of environmental awareness infused in all work performed at the installation. The awareness is most evident within the Mission Integration-Environmental Management System (MI-EMS), which provides information and training at the installation level for all military, civilian and contractor personnel. All work on Fort Lee has some degree of environmental responsibility, whether it is performed in an office or in the field. The MI-EMS helps to identify each persons' role and gives them the policies, procedures and related

environmental documentation that apply to their part of operations at the installation.

In addition, the MI-EMS helps to ensure that Fort Lee is on track to meet goals that have been set by the federal government. The installation is currently tracking several mandates to ensure air quality, soil and water quality, landfill space, and energy consumption remain able to support the Army's mission.

Goals include:

Building Management:

Reduce energy intensity 3% & water use 2% annually from previous year

Air Quality Management:

Reduce petroleum consumption 2% annually through 2020

Reduce Class II refrigerant usage and purchase; and

POL Management:

Reduce unintended releases.

Reduce Non-Hazardous Solid Waste/Hazardous Solid Waste:

Increase the diversion from landfill to recycling options by percentage from previous year.

Fort Lee Environmental Special Conditions Standard Operating Procedure: Contractors must follow The Fort Lee Environmental Special Conditions Standard Operating Procedure. It provides specific procedures for environmental requirements and best management practices to be incorporated into all work.

NEPA History at Fort Lee

Sustainability at Fort Lee is founded on the principles of the NEPA and its Army implementation policy AR 200-2, which, when applied properly, allows for mission-essential activities such as training and field exercises to be conducted without the risk of hazards and violations of regulations.

While the NEPA process has been followed at Fort Lee since its inception, its implementation became ever more prevalent during the 2005 BRAC activities which initiated tremendous installation growth that took place in a relatively short period of time. While BRAC EA and EISs were performed, Fort Lee was proactive with ensuring that awareness of sustainability and protectiveness did not end with the finalization of those documents. With an awareness that “all work is to be performed in a manner that

prevents pollution, protects the environment, and conserves natural and cultural resources,” a program to have the “best management practices” was born to integrate all of these various efforts. The Fort Lee environmental staff looked at their respective program requirements and all the various tasks and lessons learned in the field to create language that would be added to all the contracts for the various tenets, units, activities and environmental contracts. What began as a few paragraphs in post-wide contracts is now a multi-page and multi-media resource document which remains under constant review as new and current laws and regulations are added annually. The Fort Lee Environmental Special Conditions document has allowed EMD to cover and expand the growth and program needs to a wider community on Fort Lee.

NEPA Implementing Regulations

40 CFR 1500-1508

Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act

32 CFR Part 561 Environmental Analysis of Army Actions (AR 200-2)

Implements NEPA, setting forth the Army's policies and responsibilities for the early integration of environmental considerations into planning and decision-making.

Public Involvement

Despite the fact that NEPA only encourages, but does not require, public participation at the EA level, Fort Lee has made a practice of recognizing public comment periods and hosting public meetings for each EA.

Public involvement in NEPA is directed in 40 CFR 1506.6, which indicates agencies shall comply with the following six requirements (paraphrased):

Make diligent efforts to involve the public in preparing and implementing their NEPA procedures

Provide public notice of NEPA-related hearings, public meetings, and the availability of environmental documents so as to inform those persons and agencies who may be interested or affected

Hold or sponsor public hearings or public meetings whenever appropriate or in accordance with statutory requirements applicable to the agency;

Solicit appropriate information from the public

Explain in its procedures where interested persons can get information or status reports on Environmental Impact Statements (EISs) and other elements of the NEPA process

Make EISs, the comments received, and any underlying documents available to the public pursuant to the provisions of the Freedom of Information Act (5 United States Code 552), without regard to the exclusion for interagency memoranda where such memoranda transmit comments of Federal agencies on the environmental impact of the proposed action. Materials to be made available to the public shall be provided to the public without charge to the extent practicable, or at a fee which is not more than the actual costs of reproducing copies required to be sent to other Federal agencies, including the CEQ

There are additional CFR citations that pertain to public involvement requirements in NEPA, including: 40 CFR 1501.5: Environmental Assessments, which indicates that “agencies shall involve the public, State, Tribal, and local governments, relevant agencies and any applicants, to the extent practicable in preparing environmental assessments; and 40 CFR 1503.1: Inviting Comments, which is implemented after preparing a draft EIS and before preparing a final EIS. The agency shall *obtain* comments from jurisdictional Federal regulatory agencies and *request* comments from State and local regulatory agencies, applicable Indian tribes, agencies that have requested an EIS, the applicant (if any), and the public.

One other highly applicable citation from 32 CFR 651.39 Significance, paragraph (C) states that “where impacts are unknown or are suspected to be of public interest, public involvement should be initiated early in the EA (scoping) process.”

In October 2007, the CEQ published a document entitled, *Collaboration in NEPA, A Handbook for NEPA Practitioners*. The handbook is intended to be used when implementing public participation requirements at Federal facilities. The handbook was born out of a conclusion by the CEQ reported in “NEPA Task Force Report to the Council on Environmental Quality — Modernizing NEPA Implementation,” (September, 2003) which indicates that “...collaborative approaches to engaging the public and assessing the impacts of federal actions under NEPA can improve the quality of decision-making and increase public trust and confidence in agency decisions.” (CEQ Handbook, 2007).

The term “collaboration” is specifically used here as one of four levels of public engagement discussed in the handbook. The “Spectrum of Engagement in NEPA Decision-Making” includes the following hierarchical levels from least amount of public participation to the greatest amount:

Inform:

At this level the agency simply informs interested parties of its activities

Consult:

The agency keeps interested parties informed, solicits their input and considers their concerns and suggestions during the NEPA process

Involve:

The agency works more closely with interested parties and tries to address their concerns to the extent possible given the agency’s legal and policy constraints

Collaborate:

Parties exchange information and work together towards agreement on issues at one or more steps in the NEPA process

A presentation of the information about these collaboration levels is provided in greater detail in Appendix A. It also provides a pro/con analysis of the choices which Fort Lee Environmental Management Division (EMD) personnel evaluated. Based on this new, annual NEPA implementation approach, the “consult” level has been chosen as the most appropriate means of public participation. A Public Involvement Plan has been written to accompany this new process and describes the public participation activities in which Fort Lee may engage to provide information and solicit input from community members. The activities are:

| |
|---|
| Existing Opportunities - The MI-EMS required training, stakeholder coordination (regulatory, community leadership), environmental team and quarterly meetings with civilian-neighbor community groups |
| Fact Sheets |
| Public Notices (local newspaper outlets) |
| Public comment periods |
| Public meetings |
| Responsiveness Summaries |
| Mailing list updates |
| Speaker opportunities for small groups |

In addition, Fort Lee hosts a website that will be utilized when a project analysis and EA is completed. Documentation of the analysis will be uploaded to the site and viewers will be able to correspond with EMD personnel via email if desired. The web address is:
<http://www.lee.army.mil/dpw/emd/documents.review.aspx>.

Valued Environmental Components

As described in the introduction of this document, each valued environmental component, or VEC, must be analyzed to determine if a proposed action might cause a significant impact to it. The impact may be either harmful or beneficial. Fort Lee has performed analysis on fourteen VECs to establish their baseline conditions and the criteria by which significance may be determined.



In most cases, the VECs are in very good condition due to Fort Lee's thorough efforts to enforce best management practices, protect sensitive areas like wetlands and cultural resources, comply with Federal and State laws, policies, and guidance, and ensure that when an impact occurs, the VEC is returned to its original or better condition, which is in compliance with Appendix C of 32 CFR 651, Mitigation and Monitoring, paragraph (a) (3) that states: "Rectifying the impact by repairing, rehabilitating, or restoring the effect on the environment. This method restores the environment to its previous condition or better."



Significance

NEPA indicates that significance "is determined by examining both the potentially affected environment and the degree to which the proposed action may affect it" (40 CFR 1501.3(b)(1) and (2)). The analysis should establish, by resource category, the threshold at which significance is reached. This means that significance can only be determined once the proposed action is known. Each resource threshold is fully dependent on the degree to which the proposed action may affect it; therefore, significance determinations will be unique to each proposed action.

Some resource-specific thresholds may easily be applied quantitatively, such as National Ambient Air Quality Standards and Clean Water Act Maximum Contaminant Levels. Others require "discussion and comparison of impacts [which] provide sufficient analysis to reach a conclusion regarding the significance of the impact, not merely a quantification of facts" (32 CFR 651.34, paragraph (f)).

Current Project Analysis Summary

Use of the new process allows for greater time and budget efficiency. It is quite simple to perform the analysis and determine if the context and intensity of the proposed action would result in a significant impact within the framework of the established baseline information and the criteria for determining significance. All required components of NEPA analysis are present. Whenever project analysis is completed, the documentation and REC is uploaded to the Fort Lee website for public viewing. A point of contact will be provided if a reviewer wishes to contact EMD personnel in reference to the analysis.

Any Fort Lee program area has the potential to have a project requiring NEPA analysis. The program areas at Fort Lee that have the majority of projects requiring NEPA analysis are: Real Property Master Planning, Range Control, Unit Training and Family, Morale, Welfare and Recreation. This update to the ESAR includes analysis for four projects (implementation of three plans: Integrated Natural Resource Plan [INRMP], Integrated Cultural Resource Plan [ICRMP] and Integrated Pest Management Plan [IPMP]), the Renaming Operation and the documentation of a REC for Operation Allies Welcome. Full analysis information is presented in Appendix B.

Monitoring Results

This document also serves to report any monitoring, mitigation and adaptive management activities that may occur after the project has been implemented. It is common for mitigation to play a role in lessening or avoiding impacts to VECs. This section will include discussion of project-specific mitigation efforts and planned adaptive management requirements (if applicable). When warranted, adaptive management may also be implemented on an as-needed basis depending on monitoring results. For example, if a monitoring effort results in the discovery that significant soil erosion is occurring in an area where mitigation was implemented but does not seem to be working to prevent an impact, adaptive management (i.e. a different, more effective method of preventing erosion) may need to be implemented to avert further damage.

There are no monitoring, mitigation or adaptive management activities planned or ongoing at this time.

References

40 CFR Parts 1500-1508, Council on Environmental Quality.

32 CFR Part 651, Environmental Analysis of Army Actions.

Fort Lee, 2019. Fort Lee Integrated Pest Management Plan.

Fort Lee, 2021. Fort Lee Environmental Planning Services Capacity Analysis Report.

Fort Lee, 2021a. Fort Lee Installation Integrated Cultural Resource Management Plan 2021-2025

Fort Lee 2021b. Fort Lee Integrated Natural Resource Management Plan 2021-2025

Fort Lee, 2018. USAG Fort Lee Environmental Special Conditions Standard Operating Procedures (SOP)
2018

All Fort Lee Documents Accessible at: [Documents for Review :: U.S. Army Garrison Fort Lee](#)

Appendix A

NEPA Involvement Options Report

This comparison of public involvement options has been prepared for Fort Lee in support of the Fort Lee Environmental Planning Services pilot. The primary objective is to analyze Fort Lee’s resource capacity to support future installation actions taking into account established baseline information and criteria for determining significance and ensuring they are not exceeded into significant impacts. This will include identifying Fort Lee and Army-wide goals, objectives, and targets with their status and progress.

The National Environmental Policy Act (NEPA) requires agencies to appropriately involve the public when undertaking NEPA actions. A Public Involvement Plan has been developed to help guide Fort Lee in their public involvement efforts. The Council on Environmental Quality (CEQ) publication called *Collaboration in NEPA, A Handbook for NEPA Practitioners* dated October 2007, provides further guidance by presenting four options for implementing public involvement activities during NEPA phases. These options are formally called the “Spectrum of Engagement in NEPA Decision-Making” and are presented in a tiered approach ranging from the least amount of public involvement (“Inform”) to a great amount (“Collaboration”). These options along with examples of implementation are shown in Table A-1.

Table A-1 – Options

| Inform | Consult | Involve | Collaborate |
|--|---|---|---|
| <p>Agency Commitment:</p> <p>Provide parties with comprehensive, accurate and timely information about its NEPA decision-making.</p> | <p>Agency Commitment:</p> <p>Keep parties informed and consider their concerns and suggestions on the NEPA process. Provide documentation of how their input was considered in the decision-making process.</p> | <p>Agency Commitment:</p> <p>Communicate with parties to ensure that suggestions and concerns are addressed and reflected within legal and policy constraints when assessing environmental effects during the decision-making process. Provide iterative feedback on how their input is considered in the decision-making at various steps during the NEPA process.</p> | <p>Agency Commitment:</p> <p>Work directly with parties at one or more stages of the NEPA process, seeking their advice and agreement on: the purpose and needs statement, alternatives, collection and use of data, impact analysis, development of a preferred alternative, and/or recommendations regarding mitigation of environmental impacts.</p> |

| Inform | Consult | Involve | Collaborate |
|--|---|--|---|
| <p>Agency Goal:</p> <p>Provide sufficient objective information for parties to understand the issues being addressed through the NEPA process.</p> | <p>Agency Goal:</p> <p>Obtain feedback on issues in NEPA process, the alternatives considered, and the analysis of impacts.</p> | <p>Agency Goal:</p> <p>Consistently solicit and consider parties' input throughout the NEPA process to ensure that parties' concerns are understood and addressed before the analysis of impacts is concluded and a final decision</p> | <p>Agency Goal:</p> <p>Directly engage parties in working through aspects of the NEPA process potentially including the framing of the issues, the development of a range of reasonable alternatives, the analysis of impacts, and the identification of the preferred alternative – up to, but not including, the agency's Record of Decision.</p> |
| <p>Case Example:</p> <p>Management Plan for Tuolumne River in Yosemite National Park: NPS issued a brochure in Spring 2006 informing the public of its upcoming two-year planning process for the Draft EIS.</p> | <p>Case Example:</p> <p>Mississippi National River and Recreation Area, Bureau of Mines project: On September 25, 2006 NPS and FWS jointly held meeting to receive comments on the draft EIS.</p> | <p>Case Example:</p> <p>Grand Canyon National Park, Colorado River Management Plan: Scoping meetings held throughout country to shape</p> | <p>Case Example:</p> <p>FHWA and DOI, St. Croix River Crossing: Collaborative EIS process co-led by states of Wisconsin and Minnesota to reach agreement on bridge crossing St. Croix River.</p> |
| <p>NEPA Phase:</p> <p>Scoping, draft and final review and comment period.</p> <p>Processes:</p> <p>Fact Sheets, Newsletter, Web Site, Open House, Panel Presentations, Public Meetings.</p> | <p>NEPA Phase:</p> <p>All phases.</p> <p>Processes:</p> <p>Notice and Comment, Surveys, Focus Groups, Consolation, Tribal, State, Public Meetings.</p> | <p>NEPA Phases:</p> <p>All Phases.</p> <p>Processes:</p> <p>Workshops, Deliberate Polling, Individual and/or group consultations, advisory committee.</p> | <p>NEPA Phases:</p> <p>All Phases.</p> <p>Processes:</p> <p>Individual and/or group consultations, advisory committee, consensus-building, facilitation, interagency working groups, mediation, joint fact finding.</p> |

Fort Lee takes a proactive approach to being a good neighbor to the surrounding communities of Colonial Heights, Hopewell and Petersburg, VA. The relationship is strong, symbiotic, and trustworthy. While the CEQ emphasizes collaboration as a most favorable option when implementing public involvement, there is a time and place for each option indicated in Table A-1. The following table provides an analysis presenting the pros and cons for the four activities listed above.

Table A-2 – Analysis of Option Pros and Cons

| Activity | Pros | Cons |
|--|---|---|
| <p>“Inform”</p> <p>Provide parties with comprehensive, accurate and timely information about its NEPA decision-making in an effort to allow parties to understand the issues being addressed through the NEPA process.</p> | <p>Inexpensive, easy to implement, agency-led information control.</p> <p>Best used when there is low concern/high trust relationship between the agency and the surrounding community.</p> | <p>Limited means for community to provide input.</p> <p>If high concern/low trust relationship exists between the agency and the surrounding community exists, this option could be negatively perceived.</p> |
| <p>“Consult”</p> <p>Keep parties informed and consider their concerns and suggestions on the NEPA process, the alternatives considered and the analysis of impacts. Provide documentation of how their input was considered in the decision-making process.</p> | <p>Inexpensive, easy to implement, agency-led information control, provides the community a means to communicate their thoughts through comment/comment response.</p> <p>Best implemented when there is low concern/high trust relationship between the agency and the surrounding community and when the agency perceives the project has the potential to generate public interest.</p> | <p>If high concern/low trust relationship between the agency and the surrounding community exists, this option could be perceived as not providing enough opportunity to influence the outcome of the project.</p> |
| <p>“Involve”</p> <p>Consistently communicate with parties to ensure that suggestions and concerns are addressed and reflected within legal and policy constraints when assessing environmental effects during the decision-making process. Provide iterative feedback on how their input is considered in the decision-making at various steps during the NEPA process and specifically before analysis is concluded and final decisions are made.</p> | <p>Provides a great deal of opportunity for the public to communicate their questions and/or concerns about the project and be assured that their voices are being heard.</p> <p>Allows the agency to be aware of public concerns every step of the way and provides them with a means to mitigate issues as they arise.</p> | <p>More labor intensive and expensive than “Inform” and “Consult” in that agency personnel would need to be at least partially dedicated to the task of communicating project details. Training may need to be provided if public interest is great and a need to educate people about NEPA and the legal and policy constraints under which Federal agencies must work is necessary for public understanding of the project.</p> |

| Activity | Pros | Cons |
|--|---|---|
| <p>“Collaborate”</p> <p>Work directly with parties at one or more stages of the NEPA process, seeking their advice and agreement on all aspects of the project, including decision-making up to the point of delivering the Record of Decision.</p> | <p>This option provides the greatest amount of opportunity for the public to be involved with NEPA projects.</p> <p>It provides the agency an opportunity to work in partnership with the surrounding community and know that by the time the Record of Decision is ready to be written, all decisions regarding issues, alternatives and impact analysis have been fully vetted by all stakeholders.</p> <p>While this process would work wonderfully to maintain a good relationship between the agency and the surrounding community, this option is imperative when a high concern/low trust relationship exists.</p> | <p>This option comes at a greater monetary cost than the other three.</p> <p>There is a need for dedicated personnel to manage the collaboration activities.</p> <p>This option is labor intensive with constant preparation of dedicated project materials as well as ancillary meetings taking place outside of normal work-hours to accommodate the schedules of all stakeholders.</p> |

Appendix B-1

Integrated Cultural Resource Management Plan (FY2021-2025)

Purpose and Need for Action

The ICRMP has undergone an update for the range of FY 2021 through FY2025. The preparation and implementation of an ICRMP for internal program management purposes is mandated by both Department of Defense Instruction (DoDI) 4715.16, Cultural Resources Management (September 18, 2008: Incorporating Change 2, Effective August 31, 2018) and Army Regulation (AR) 200-1, Environmental Protection and Enhancement (13 December 2007) for every installation with cultural resources. Additionally, ICRMPs are to be developed in consultation with the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officers (THPO) and other appropriate stakeholders. Installations are required to maintain their ICRMPs by reviewing them annually to ensure they are current, with updates completed every five years. In the event that Department of Defense (DoD) guidance, instruction or regulation specific to cultural resources changes, a programmatic or other agreement document is executed or amended, a new Government to Government relationship established or a consultation protocol document is executed with a Tribe, the ICRMP shall be updated within three months of the effective date, with a summary of all changes noted in the document change log.

As established by AR 200-1, Army Cultural Resource Program (CRP) policy dictates in part, that “installations make informed decisions regarding the cultural resources under their control in compliance with public laws, in support of the military mission, and consistent with sound principles of cultural resources management.” Thus, the primary purpose of an ICRMP, most importantly an updated ICRMP, is to serve as an internal planning tool in support of this objective.

The installation staff will ensure that other staff planning documents support and are consistent with the ICRMP.

Description of Proposed Action and Alternatives for ICRMP Implementation

Organizationally and as at most DoD components, the management and protection of cultural resources at the installation level falls to the Directorate of Public Works (DPW). At USAG Fort Lee this responsibility is carried out by the Environmental Management Division (EMD), one of six divisions within the DPW. Within the EMD, cultural resources fall under the Conservation Branch, as does the position of Cultural Resource Manager (CRM). The Conservation Branch oversees the preservation and management of Fort Lee’s natural and cultural resources, elements which form the most visible and

abundant of the installation's environmental constraints. In turn, this ties the Conservation Team to every aspect of Fort Lee's planning and mission objectives.

Installations are required to maintain their ICRMPs by reviewing them annually to ensure they are current, with updates completed every five years. ICRMPs are to be developed in consultation with the SHPO, THPO and other appropriate stakeholders. This ICRMP serves as the five-year update for FYs beginning with 2021 through 2025. The proposed action maintains compliance with the aforementioned Army regulations and provides a framework with which the CRM to work over the next four years.

Alternatives Considered

The Army analyzed a No Action Alternative. An environmental analysis of a No Action Alternative is required by CEQ regulations to serve as a baseline against which the Proposed Action can be evaluated.

Under the No Action Alternative, the Army would not implement the 2021-2025 ICRMP. This would cause Fort Lee to be non-compliant with Army regulations and without written plans to protect cultural resources for the foreseeable future.

Actions Eliminated From Detailed Analysis

The only action associated with this analysis is the implementation of the ICRMP. There are no other actions being eliminated from this discussion.

VEC Analysis

The following analysis was performed utilizing the Capacity Analysis Report, which includes the full description of the baseline information and criteria for determining significance for each of the following VECs.

Significance is determined by examining the potentially affected environment and the degree to which the *proposed action* may affect it. For implementation of the FY2021-2025 ICRMP, the degree to which the proposed action (continued management of cultural resources) may affect the potentially affected environments is consistent with best management practices and Army policy. Management of cultural resources will not involve activities that will interfere with Fort Lee’s operations or the living conditions of residents. Best management practices (such as those found in the Environmental Special Conditions SOP) to avoid or lessen the impact on the environment and surrounding community will be applied.

The Environmental Consequence Analysis columns have been completed after a thorough review of the Criteria for Determining Significance provided for each VEC in the Capacity Analysis Report.

Table B-1 – Environmental Consequences Analysis

| Air Quality |
|---|
| <p>Environmental Consequence Analysis – Proposed Action:</p> <p>No adverse impacts to air quality would be expected from the Proposed Action. Activities associated with management of cultural resources would not result in any impact to air quality.</p> <p>Environmental Consequence Analysis– No Action:</p> <p>Under the no action alternative, there would be no impact to air quality.</p> |

Airspace

Environmental Consequence Analysis – Proposed Action:

Airspace is not anticipated to be affected. Airspace at Fort Lee is currently unrestricted, and the proposed action will not create an environment whereas that status would be changed to a designation of Special Use Airspace.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to airspace. Like with the proposed action, there are no cultural resource activities being introduced that would change Fort Lee airspace to a designation of Special Use Airspace.

Cultural Resources

Environmental Consequence Analysis – Proposed Action:

The Proposed Action would have long-term beneficial effects to the Cultural Resources VEC, as implementation of the ICRMP will result in continued management and protection of these important resources.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be a long-term, negative effect. The Fort Lee CR program would be out of compliance with the requirement to update the ICRMP, and there would be no formal plan in place to manage current and future cultural resource activities.

Government Services

Environmental Consequence Analysis – Proposed Action:

Implementation of the ICRMP will not result in an increase of population. Therefore, there would be no impact to schools, libraries, the characteristics of recreational opportunities on and near Fort Lee, or health and safety services (fire, police, or hospital).

Environmental Consequence Analysis– No Action:

Under the no action alternative, the current status of government services on and near Fort Lee would remain the same.

Hazardous, Toxic and Radioactive Substances

Environmental Consequence Analysis – Proposed Action:

There would be no significant impacts from hazardous, toxic, or radioactive substances from implementation of the ICRMP.

Environmental Consequence Analysis– No Action:

Under the No Action Alternative, there would be no significant impacts associated with hazardous, toxic, or radioactive substances.

Infrastructure

Environmental Consequence Analysis – Proposed Action:

There is no concern of significantly impacting any of the privatized utilities (potable water, sewer, electricity and natural gas).

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to infrastructure.

Land Use

Environmental Consequence Analysis – Proposed Action:

ICRMP implementation will continue the beneficial impact of ensuring that coordination of land use considerations for all undertakings includes CR. In addition, protecting the view shed of the Petersburg National Battlefield (PETE) is a specific consideration for CR, ensuring that all future development plans include the reduction of visual and noise impacts, high bay doors facing away, road circulation design to avoid PETE boundary and exterior lighting minimization, therefore making implementation of the ICRMP important to the land use VEC.

Environmental Consequence Analysis– No Action:

Under the no action alternative, potential impact to land use may occur. Significance of such impact would depend on the proposed action, but the policies, guidance and considerations indicated in the ICRMP are critical for ensuring decision-makers and stakeholders understand any CR impacts that may be incurred by a project.

Noise

Environmental Consequence Analysis – Proposed Action:

ICRMP implementation will continue the beneficial impact of ensuring that potential noise impacts are minimized for PETE. The ICRMP specifically indicates that new construction along shared property boundary must be sited in a manner to reduce visual and noise impacts to the PETE. Coordination of noise considerations for all undertakings includes CR.

Environmental Consequence Analysis– No Action:

Under the no action alternative, potential noise impact to PETE may occur. Significance of such impact would depend on the proposed action, but the policies, guidance and considerations indicated in the ICRMP are critical for ensuring decision-makers and stakeholders understand any CR impacts that may be incurred by a project near the shared Fort Lee/PETE boundary.

Socioeconomics

Environmental Consequence Analysis – Proposed Action:

Implementation of the ICRMP will not impact socioeconomic area of influence, economics, demographics or housing.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to socioeconomic health.

Soil Erosion

Environmental Consequence Analysis – Proposed Action:

Soil erosion will not be experienced due to ICRMP implementation. Fort Lee complies with Code of Virginia regulations that requires all Fort Lee organizations and tenants to coordinate any land disturbing activities with the DPW, to ensure concerns such as archeological resources are not compromised.

Environmental Consequence Analysis– No Action:

Under the no action alternative, soil erosion will not be experienced if the ICRMP is not implemented. The aforementioned Code of Virginia regulations will still be in effect.

Threatened and Endangered Species

Environmental Consequence Analysis – Proposed Action:

Implementation of the ICRMP is not anticipated to create an impact to threatened and endangered species.

Environmental Consequence Analysis– No Action:

No Implementation of the ICRMP is not anticipated to create an impact threatened and endangered species.

Traffic and Transportation

Environmental Consequence Analysis – Proposed Action:

Traffic and transportation systems will not be affected by implementing the INRMP.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to traffic and transportation.

Water Resources

Environmental Consequence Analysis – Proposed Action:

Groundwater, Stormwater and Surface Water: Water resources are not anticipated to be impacted by implementation of the ICRMP.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to water resources.

Wetlands

Environmental Consequence Analysis – Proposed Action:

Wetlands are not anticipated to be impacted by implementation of the ICRMP.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to wetlands.

Causal Relationships

The CEQ regulations stipulate that a causal relationship analysis within an EA should consider those “effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives. Such

impacts can result from individually minor but collectively significant actions taking place over a period of time.” The “causal relationship” terminology supersedes use of the term “cumulative effects” which had been used in analysis until the July 2020 update to 40 CFR 1508.

An effort has been made to identify all actions that are being considered and that are in the planning phase at this time. To the extent that details regarding such actions exist and the actions have a potential to interact with the Proposed Action and the No Action Alternative, these actions are included in this analysis. This approach enables decision makers to have the most current information available so that they can evaluate the environmental consequences of the Proposed Action and the No Action Alternative.

There are four additional proposed actions at Fort Lee which may be implemented at the same time as the Proposed Action. These are the implementation of the INRMP, implementation of the IPMP, Operation Allies Welcome and the Renaming Operation.

The Proposed Action would result in the effects identified in Table B-1. The effects of the Proposed Action would be maintained at acceptable levels with the continued implementation of the policies identified in the ICRMP.

There is no causal relationship between the proposed action and the additional four proposed actions that may be implemented at the same time.

Appendix B-2

Integrated Natural Resources Management Plan Implementation (FY2021-2025)

Purpose and Need for Action

The previous INRMP covered a post-BRAC period in which Fort Lee had almost doubled in size in terms of built space and personnel. Since that time, the installation has continued to grow with follow-on construction projects and re-tooling of the military mission. The landscape has continued to change in smaller units than with BRAC but with results almost as dramatic. The purpose of the updated INRMP is to reconcile those changes into a forward-looking revision. Implementation of the INRMP provides for future environmental stewardship and its implementation in the context of the military mission, with the intent of no net loss of readiness capability.

Description of Proposed Action and Alternatives for INRMP Implementation

The INRMP covers the entirety of Fort Lee as it exists on 5907 acres in central Virginia. The installation acreage includes a 1,600-acre Range Complex, a 400-acre Ordnance Campus, and a nearly 3,800-acre Cantonment area separated only by state highways. There are also three separate small parcels totaling almost 58 acres. The satellite parcels include a four-acre water training site on the Appomattox River, a 52-acre wooded parcel on the east side of I295, and a two-acre parcel in the median of I295. The two-acre parcel is not recognized by the installation for any use. The 52-acre parcel is only used for hunting, as it has no legal road access, and is entered only through an arrangement with private landowners.

The primary goal of the INRMP is to integrate the conservation, management, and recreational use of natural resources in concert with the military mission, resulting in the maintenance of expected biodiversity with no net loss of military readiness or training opportunity.

Objectives include the need to:

- Manage ecosystems to protect, conserve, and enhance native flora and fauna with an emphasis on biodiversity conservation.
- Collaborate with trainers to integrate conservation measures with military operations.
- Identify natural resource recreation and management opportunities compatible with environmental stewardship and the military mission.
- Guide the professional enforcement of natural resources related laws.
- Continue to build cooperation with the US Fish and Wildlife Service (USFWS) and the State, relative to the proper management and protection of natural resources, and listed species.
- Serve as a primary information source for NEPA analyses.
- Document requirements for the natural resources budget.

No Action Alternative

INRMPs must be reviewed as to operation and effect on a regular basis, but no less often than every 5 years, by DoD, USFWS, NOAA Fisheries Service (if applicable) and State fish and wildlife agencies. This review must be documented and signed by these parties. If the INRMP is not implemented, it would result in non-compliance with the federal regulation known as the Sikes Act, which indicates the requirement to do so.

VEC Analysis

The following analysis was performed utilizing the Capacity Analysis Report, which includes the full description of the baseline information and criteria for determining significance for each of the following VECs.

Significance “is determined by examining the potentially affected environment and the degree to which the *proposed action* may affect it.” For implementation of the INRMP, the degree to which the proposed action (continued management of natural resources) may affect the potentially affected environments is consistent with best management practices and Army policy. Management of natural resources will not involve activities that will interfere with Fort Lee’s operations or the living conditions of residents. Best management practices (such as those found in the Environmental Special Conditions SOP) to avoid or lessen the impact on the environment and surrounding community will be applied.

The Environmental Consequence Analysis columns have been completed after a thorough review of the Criteria for Determining Significance provided for each VEC in the Capacity Analysis Report.

Table B-2 – Environmental Consequences Analysis

| Air Quality |
|--|
| <p>Environmental Consequence Analysis – Proposed Action:</p> <p>No adverse impacts to air quality would be expected from the Proposed Action. Activities associated with management of natural resources would not result in any impact to air quality.</p> <p>Environmental Consequence Analysis– No Action:</p> <p>Under the no action alternative, there would be no impact to air quality.</p> |

Airspace

Environmental Consequence Analysis – Proposed Action:

Airspace is not anticipated to be affected. One consideration noted in the INRMP includes the fact that there remain unused bald eagle nests in close proximity to Fort Lee. However, airspace remains unrestricted for the aerial delivery training. The installation is aware of continued protections of the Bald and Golden Eagle Protection Act, despite the fact the birds are no longer threatened or endangered.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to airspace.

Cultural Resources

Environmental Consequence Analysis – Proposed Action:

Cultural resources are not anticipated to be affected. If a specific natural resource-related activity required an undertaking meeting the criteria set forth in the INCRMP, then that undertaking would be subject to review by the Cultural Resource Manager and adherence to the requirements presented in the INCRMP.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to cultural resources.

Government Services

Environmental Consequence Analysis – Proposed Action:

Government Services are not anticipated to be affected by the proposed plan.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to government services

Hazardous, Toxic and Radioactive Substances

Environmental Consequence Analysis – Proposed Action:

Implementation of the INRMP is not anticipated to affect the management of hazardous, toxic and radioactive substances.

Environmental Consequence Analysis– No Action:

No effect is anticipated if the INRMP is not implemented.

Infrastructure

Environmental Consequence Analysis – Proposed Action:

There is no concern of significantly impacting any of the privatized utilities (potable water, sewer, electricity and natural gas)

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to infrastructure

Land Use

Environmental Consequence Analysis – Proposed Action:

INRMP implementation will continue the beneficial impact of the Game Management/Hunting Program. Hunting occurs annually on land that is also used for training. The Directorate of Plans, Training, Mobilization and Security (DPTMS), EMD and Safety offices work in close coordination to ensure there is no overlap of activities. Nearly all hunting occurs on training land, therefore training mission requirements and the Natural Resource Management Office's Game Management goals are carefully orchestrated to ensure both missions are successfully, and most importantly, safely executed.

Environmental Consequence Analysis– No Action:

Under the no action alternative, Game Management goals may be placed in jeopardy. Game Management is synergistically entwined with the training mission, as both share the land used for each activity. Without a clear plan for coordinating these events, it is anticipated an impact to one or both of those missions could occur.

Noise

Environmental Consequence Analysis – Proposed Action:

Implementation of the INRMP is expected to have long-term, beneficial impact through the mitigation activities employed for the conservation of the threatened Northern Long-eared Bat (NLEB) and Indiana Bat.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be potential impact to the NLEB and Indiana Bat if the mitigation activities employed to ensure their continued use of Fort Lee are not implemented.

Socioeconomics

Environmental Consequence Analysis – Proposed Action:

Implementation of the INRMP is not anticipated to have any impact socioeconomics.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to socioeconomic health.

Soil Erosion

Environmental Consequence Analysis – Proposed Action:

INRMP implementation has a long-term, beneficial effect on soil erosion mitigation efforts. The Natural Resources Manager (NRM) is responsible for ensuring that projects adhere to stormwater and erosion control permit requirements and best management practices.

Environmental Consequence Analysis– No Action:

Under the no action alternative, short-to-long term impacts could be anticipated if soil erosion mitigation efforts are not afforded the opportunity to be documented and properly managed through implementation of the INRMP.

Threatened and Endangered Species

Environmental Consequence Analysis – Proposed Action:

Long-term beneficial effects are anticipated with INRMP implementation. The NRM is responsible for the management and protection of threatened and endangered species. The INRMP is the tool by which the activities associated with that responsibility is documented. No impact is anticipated to threatened and endangered species. The NLEB and the Indiana Bat are threatened and are assumed to be present on-post after acoustic monitoring detected call characteristics consistent with the species.

Timber removal greater than one acre for any one project within the NLEB activity season of April 1 through October 31 and ten acres outside of the activity season (November 1 through March 31) must be avoided. In order to avoid the potential of destroying NLEB habitat (which would be considered a significant impact), timber removal will meet this schedule criteria.

Environmental Consequence Analysis– No Action:

Under the no action alternative, long-term, negative effect is anticipated. Since Fort Lee is home to two listed and one proposed sensitive species, INRMP implementation is crucial for the management of the species and their habitat.

Traffic and Transportation

Environmental Consequence Analysis – Proposed Action:

Traffic and transportation systems will not be affected by implementing the INRMP.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to traffic and transportation.

Water Resources

Environmental Consequence Analysis – Proposed Action:

Groundwater, Stormwater and Surface Water: Long-term beneficial effects are anticipated with INRMP implementation. The NRM is responsible for the management and protection of all water resources. The INRMP documents the types of activities required for permit and other regulatory requirements, as well as best management practices. The INRMP is the tool by which the activities associated with that responsibility is documented.

Environmental Consequence Analysis– No Action:

Under the no action alternative, long-term, negative effect is anticipated. No INRMP implementation may result in non-compliance of the myriad of water resource permit and other regulations of which Fort Lee is subject.

Wetlands

Environmental Consequence Analysis – Proposed Action:

Long-term beneficial effects are anticipated with INRMP implementation. There are no anticipated INRMP implementation activities that would contribute to wetland impacts. Wetlands are protected by the same Land Disturbance and Ground Excavation Policy described in the Land Use section, as well the Chesapeake Bay Preservation Act (CBPA), other regulations and best management practices specific to wetland management.

Environmental Consequence Analysis– No Action:

Under the no action alternative, the same CBPA and other regulatory and best management practice protections would be in place and no impacts are anticipated.

Causal Relationship

The CEQ regulations stipulate that a causal relationship analysis within an EA should consider those “effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives. Such

impacts can result from individually minor but collectively significant actions taking place over a period of time.” The “causal relationship” terminology supersedes use of the term “cumulative effects” which had been used in analysis until the July 2020 update to 40 CFR 1508.

An effort has been made to identify all actions that are being considered and that are in the planning phase at this time. To the extent that details regarding such actions exist and the actions have a potential to interact with the Proposed Action and the No Action Alternative, these actions are included in this analysis. This approach enables decision makers to have the most current information available so that they can evaluate the environmental consequences of the Proposed Action and the No Action Alternative.

There are four additional proposed actions at Fort Lee which may be implemented at the same time as the Proposed Action. These are the implementation of ICRMP, implementation of the IPMP, Operation Allies Welcome and the Renaming Operation.

The Proposed Action would result in the effects identified in Table B-2. The effects of the Proposed Action would be maintained at acceptable levels with the continued implementation of the policies identified in the INRMP.

There is no causal relationship between the proposed action and the additional four proposed actions that may be implemented at the same time.

Appendix B-3

Integrated Pest Management Plan (IPMP) (2019)

Purpose and Need for Action

This plan provides guidance for operating and maintaining an effective pest management program for Fort Lee, Virginia. This plan will utilize the principles of integrated pest management (IPM) to achieve an effective pest control program with minimal environmental contamination.

Description of Proposed Action and Alternatives for IPMP Implementation

The IPMP describes the installation's pest management requirements, outlines the necessary surveillance and control requirements, and describes the administrative, safety, and environmental requirements of the program. Fort Lee no longer employs government entomologists. Family Housing on Fort Lee was privatized in September, 2007 and all pest control is handled by the contractor. It was identified in the lease that the Privatized Contractor will use Fort Lee approved pesticides, herbicides and sub-contractors. The privatized contract partner will report annual usage of all pesticides and herbicides. All other entomological functions are performed via contract or local purchase (credit card purchase) in accordance with guidelines established in US Army Garrison & FL Policy 17-03. There are no known threatened or endangered entomological or invasive flora/fauna species on Fort Lee with the loss of the last confirmed species in 2003.

Alternatives Considered

The Army analyzed a No Action Alternative. An environmental analysis of a No Action Alternative is required by CEQ regulations to serve as a baseline against which the Proposed Action can be evaluated.

Under the No Action Alternative, the Army would not implement the IPMP. This would cause Fort Lee to be non-compliant with US Army Garrison and Fort Lee Policy 17-03 and without written plans for the foreseeable future. It would also leave Fort Lee without a clear plan for pest management, which could have a negative impact.

Actions Eliminated From Detailed Analysis

The only action associated with this analysis is the implementation of the IPMP. There are no other actions being eliminated from this discussion.

VEC Analysis

The following analysis was performed utilizing the Capacity Analysis Report, which includes the full description of the baseline information and criteria for determining significance for each of the following VECs.

Significance is determined by examining the potentially affected environment and the degree to which the *proposed action* may affect it. For implementation of the IPMP, the degree to which the proposed action (continued management of pests) may affect the potentially affected environments is consistent with best management practices and Army policy. Pest management will not involve activities that will interfere with Fort Lee's operations or the living conditions of residents. Best management practices (such as those found in the IPMP and the Environmental Special Conditions SOP) to avoid or lessen the impact on the environment and surrounding community will be applied.

The Environmental Consequence Analysis columns have been completed after a thorough review of the Criteria for Determining Significance provided for each VEC in the Capacity Analysis Report.

Environmental Consequences Analysis

The analysis of IPMP implementation does not indicate potential impact to any of the VECs presented in the CAR except for Wetlands. Air Quality, Air Space, Cultural Resources, Government Services, Hazardous, Toxic and Radioactive Substances, Infrastructure, Land Use, Noise, Socioeconomics, Soil Erosion, Threatened and Endangered Species, Traffic and Transportation, and Water Resources. Therefore, these VECs are not carried forward in formal analysis.

However, it is important to note that the IPMP implementation or No Action may have an impact on human, animal and ecological health and safety, therefore that topic is being introduced as a VEC for this particular proposed action along with wetlands.

Table B-3 – Environmental Consequences Analysis

Hazardous, Toxic and Radioactive Substances

Environmental Consequence Analysis – Proposed Action:

Long-term, beneficial impact is anticipated with the implementation of the IPMP. The practice of IPM greatly reduces the amount of environmental toxins that might otherwise be used if the IPMP is not implemented.

Environmental Consequence Analysis– No Action:

No action may create a scenario where pest management reverts back to use of chemical-based pest- and herbicides managed by the installation. As pest management has been managed under contract, there is [minimal] risk of generating of a new waste stream that cannot be immediately or safely managed under existing protocols.

Health and Safety

Environmental Consequence Analysis – Proposed Action:

Long-term, beneficial impact is anticipated with the implementation of the IPMP. Pest control is an important factor for residences and buildings/areas where business and training are conducted. Sanitation deficiencies are a major impediment toward pest control, and the IPMP states that “chemical control will not be recommended until sanitation deficiencies are corrected.” When chemical control is deemed to be necessary, the state of Virginia has a licensing program that trains and certifies individuals to properly apply pesticides in a manner that is safe for humans (especially infants and children), pets, and environmental receptors.

Environmental Consequence Analysis– No Action:

The health and safety of humans, pets and environmental receptors may be impacted if the IPMP is not implemented. Without management, unwelcome insects, reptiles, invasive species, rodents, and stray animals may put people, pets and environmental resources at risk of disease and injury.

Government Services

Environmental Consequence Analysis – Proposed Action:

Long-term, beneficial impact is anticipated with the implementation of the IPMP. Chemical treatment often creates a need for government service buildings to be vacated, shutting down or reducing their hours since immediate human and/or animal exposure may pose a health and safety risk. Implementation of the IPMP effectively eliminates the risk of this inconvenience.

Environmental Consequence Analysis– No Action:

Risk of government service interruption is greater when considering no action. As discussed above, service disruption or shut-down may need to occur if the IPMP is not implemented and chemical treatment is used instead.

Wetlands

Environmental Consequence Analysis – Proposed Action:

Wetlands are a sensitive area that are specifically indicated as such in the IPMP, and great care is expected when wetlands are in areas where pesticide or herbicide application is needed. The IPMP indicates that care must be taken not to harm wetlands and that “no pesticides will be applied directly to wetlands or water areas unless use in such sites is specifically approved on the label.” With these best management practices in place, no impact is anticipated.

Environmental Consequence Analysis– No Action:

Long-term impact may be experienced to wetlands if the IPMP is not implemented. If there were no clear plan for use of pesticides and herbicides as a last resort for management, chemical unsafe for use in wetlands or water areas could potential be introduced, creating a harmful environment to such sensitive areas.

Causal Relationships

The CEQ regulations stipulate that a causal relationship analysis within an EA should consider those “effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives. Such

impacts can result from individually minor but collectively significant actions taking place over a period of time.” The “causal relationship” terminology supersedes use of the term “cumulative effects” which had been used in analysis until the July 2020 update to 40 CFR 1508.

An effort has been made to identify all actions that are being considered and that are in the planning phase at this time. To the extent that details regarding such actions exist and the actions have a potential to interact with the Proposed Action and the No Action Alternative, these actions are included in this analysis. This approach enables decision makers to have the most current information available so that they can evaluate the environmental consequences of the Proposed Action and the No Action Alternative.

There are four additional proposed actions at Fort Lee which may be implemented at the same time as the Proposed Action. These are the implementation of INRMP, implementation of the ICRMP, Operation Allies Welcome and the Renaming Operation.

The Proposed Action would result in the effects identified in Table B-3. The effects of the Proposed Action would be maintained at acceptable levels with the continued implementation of the policies identified in the IPMP.

There is no causal relationship between the proposed action and the additional four proposed actions that may be implemented at the same time.

Appendix B-4

Operation Allies Welcome (2021)

Purpose and Need for Action

Operation Allies Welcome is a humanitarian mission undertaken by Fort Lee beginning in August, 2021 with completion in mid-November, 2021. Over 1500 Afghan ally refugees, many of whom served alongside American forces as interpreters during the war in Afghanistan, were provided room and board, fed, treated medically, and provided entertainment and religious venues while in-processing for their stay in the United States.

Description of Proposed Action and Alternatives for Operation Allies Welcome

A Life Support Area (LSA) was designed and established, which included support areas that required placement of equipment on hardstand areas. Two dining facilities (DFACS) were located close to the existing IHG Army Hotel (Building 12015) and each held 500 people. The food preparation and kitchen area was placed behind the DFACS.

Along the side of Building 12015 was a religious center which also held about 500 people. It had a handwashing station for cleansing rituals before prayer time. A soccer field/play area for family entertainment was provided near Building 12015. Behind it, the medical tent was erected.

Existing barracks buildings 9300 and 9302 was used for unaccompanied males. The Mayor Cell/Contractor Administrative facility was housed in the at Building 9305. COVID-19 positive patients were required to shelter-in-place with food delivered to them. As the barracks do not have individual bathroom facilities, additional showers and toilets were brought in via trailer in the Building 9300 area.

VEC Analysis

Record of Environmental Consideration

This project’s NEPA documentation was completed using a Record of Environmental Consideration (REC). The citation used to categorically exclude this project from full analysis in an EA is Appendix B to 32 CFR Part 651, Section II (b)(13), which states: Actions affecting Army property that fall under another federal agency’s list of categorical exclusions when the other federal agency is the lead agency (decision maker), or joint actions on another federal agency’s property that fall under that agency’s list of categorical exclusions. Use of this categorical exclusion requires the preparation of a REC and, as indicated above, one was prepared prior to project implementation. The REC was reviewed by the Fort Lee EMD manager and personnel who specialize in NEPA, Air Quality, Asbestos and Lead, Compliance, Pollution Prevention, Conservation, and Cultural Resources.

Despite the use of a REC without need of an EA, it is worth noting that three VECs, **Land Use, Noise, and Traffic and Transportation**, may have seen some minor, short-term adverse impact during Operation Allies Welcome.

Land use in the vicinity of the PETE and Garrison Command Headquarters changed temporarily into a small tent city which was ultimately reverted back to pre-operation conditions once complete.

Construction noise was temporarily impactful for humans and animals in the vicinity of the operation location, but did not occur long-term and was complete once the tents were erected. Despite the fact thousands of foreign nationals passed through in a short amount of time, an increase in appreciable levels of noise was not experienced.

There are six gates at Fort Lee, four of which may have been impacted by an increase in traffic flow. Each saw minor to more substantial increase in usage during the period of July 26 through August 15, 2021 as shown in Table B-4:

Table B-4 – July-August Gate Traffic Data

| Gate | July 19-25 (Normal Week) | July 26 to Aug 1 | Aug 2-8 | Aug 9-15 | Average and divided by “normal week” control in % |
|---------|-----------------------------|------------------|---------|----------|--|
| A Ave | 4898 | 5455 | 5483 | 5306 | 10.5% |
| Mahone | 28857 | 29849 | 29247 | 31893 | 5% |
| Sisisky | 60844 | 63314 | 68852 | 65113 | 8% |
| Shop Rd | 1647 | 1424 | 1868 | 1640 | .01% |

The REC is attached here for information purposes.

Record of Environmental Consideration

PERMISSION ONLY - CRITICAL MILITARY OPERATION: Establish LSA in Building 9300 Area & IHG Lodging Building 12015

Project Information

| | | | |
|----------------------------------|---|-------------------------|---|
| Project Number: | PJ001011J | Date of Request: | 2021-07-20 |
| Tracking Number: | 9694 | Category: | 4283 - Work Order Review |
| Title of Proposed Action: | PERMISSION ONLY - CRITICAL MILITARY OPERATION: Establish LSA in Building 9300 Area & IHG Lodging Building 12015 | Attachments: | PJ00101-21.pdf LSA Section 106 Consultation.pdf 2021.PA615 SHPO Comments.pdf OAR Planning Building Footprint.pdf |
| Due Date: | 2021-07-20 | | |
| Proponent: | KEVIN NESTOR | | |
| Fiscal Year: | 2021 | | |
| Organization | DPW, OPS DIV | | |
| Buildings | 9300 9302 9303 9305 12015 8401 8402 8150 8133 | | |

Purpose and Need of Action:

Request support on the establishment of an LSA Building 9300 area and Building 12015 at Fort Lee, VA. All buildings will be used as designed and support areas will require placement of equipment on hardstand areas. Please see attached map for reference location. POC is Kevin Nestor 804-734-5086, Jame Mills 804-3560 or Carlos Gainer 804-734- 5017. Two DFACS will be located close to IHG and will each hold 500 people. Behind that will be the food prep/kitchen area. Along the side of IHG will be a religious center to also hold about 500 people. It will have a handwashing station for cleansing rituals before prayer time. There will also be a soccer field/play area for the families at IHG. Behind IHG is the medical tent. We will utilize 9300 and 9302 for unaccompanied males. 9305 will be the Mayor Cell/Contractor Admin facility. COVID positive patients will shelter in place and food will be brought to them. The barracks do not have individual bathroom facilities. Additional showers and toilets will be brought in via trailer in the 9300 area.

Program Review

1 - NEPA - Reviewed by

Meets Requirements? Yes

No REC is good for longer than a 1-year time period from date of REC. If the project has not begun nor contract released, the entire project must be returned for a new and current review of the effort.

Fort Lee has an Environmental Special Conditions Package and approved language that is to be used in contracts for work on post. SEE BELOW https://home.army.mil/lee/application/files/6615/5318/2597/Environmental_Special_Conditions.pdf Contractor or sub-contractors doing work must be made aware of the Fort Lee Environmental Special Conditions Package (ESC) and that they are required to follow the guidance, laws, and mandates of that document. All contracts on Fort Lee must contain the following language and be designated as: SECTION X or PWS or contract language Environmental. The ESC is meant to identify requirements in general, and those requirements unique to Fort Lee; and ensure full compliance with pertinent provisions of Federal, State (Virginia), and local regulations and procedures, which are (or put) in effect during the course of contract performance. The ESC is not intended to be fully inclusive of all regulations. It is the Contractor's responsibility to comply with all Federal, State, and Local laws, regulations, or guidance. The Contractor shall execute Environmental Best Management Practices (BMPs). Any fines and penalties that are the result of actions by the Contractor, its subcontractors, employees, or other representatives/agents of the Contractor are the responsibility of the Contractor to pay.

Expect a traffic flow increase of approximately 500 cars at the Sisisky, Mahone, and A Avenue gates between the hours of 06:00-08:30 due to displaced IHG residents.

Expect an increase in vehicle and construction noise in proximity to Building 9300 and 12015 during mobilization and initial LSA set up.

08/23/2021 A Combat Service Support Battalion (CSSB) consisting of 501 personnel arrived at Ft Lee to support Operation Allies Refuge.

8/24/21: A total of 792 Afghan Special Immigrants (ASI) have been processed through Ft Lee to date. The number of ASI's expected to be present at Ft Lee at any one time is not to exceed 1750 personnel. The total number of ASI's expected to be processed at Ft Lee based on a signed Department of State MOU is approximately 3500 personnel.

An additional CATEGORICAL EXCLUSION of B-(2) EMERGENCY OR DISASTER ASSISTANCE PROVIDED TO FEDERAL, STATE, OR LOCAL ENTITIES will be utilized along with B-(13) for this military operation.

2 - Air Quality Specialist - Reviewed by*Meets Requirements? Yes*

Any equipment (water heaters, generators, diesel light sets, HVAC, etc.) provided by the contractor will NOT be covered under the Fort Lee air permit and must comply with all Clean Air Act, VDEQ, and Army regulations. The contractor should keep proper documentation on hand for rented equipment.

2 - Asbestos & Lead - Reviewed by*Meets Requirements? Yes*

Based on the currently reviewed proposed project, the scope does not appear to involve AB/Lead AQ elements that require further analysis, or a technical review comment. Should the scope of this project change, a separate review, and analysis is required.

2 - Compliance Team Lead - Reviewed by*Meets Requirements? Yes*

no concerns

3 - P2 Team Lead - Reviewed by*Meets Requirements? Yes*

No concerns.

4 - Conservation Team Lead - Reviewed by*Meets Requirements? Yes*

Concur with NEPA Manager's comments on traffic and noise. Coordination with NPS Superintendent would be appropriate as a "good neighbor" policy.

4 - Cultural Resource Manager - Reviewed by*Meets Requirements? Yes*

This project involves both new construction and a portion of the APE is directly across from a National Park. The project has been determined to be a matter of life, health and safety (see attachment) and thus, will be consulted on in accordance with Stipulation VI of the O&M PA.

Section 106 Consultation Initiated 07/20/21.

Section 106 Consultation Completed 07/21/21.

5 - Environmental Management Division Manager - Reviewed by*Meets Requirements? Yes*

1. If ground breaking is required, besides erecting tents and equipment tethering an additional work order will be required.
2. Contractor is required to pay for all fines issued by State or Federal regulators for environmental non-compliance.
3. The Contractor will submit a pest application plan to the KO (or designated Government representative) for DPW-EMD review and approval prior to the use of pesticides. The pest application plan must include all the information that is required in the IPMP, AR 200-1, USAG Fort Lee Policy 17-03, and any other applicable state or federal requirements. Only chemicals approved by the Army Environmental Command and on USAG Fort Lee's approved pesticide list can be used on the installation. The Contractor must be on the USAG Fort Lee Pest Contractor approved list, as provided by the DPW-EMD. After product is applied, submit amount of concentrated quantity applied on DA 1532 or another DPW-EMD approved format. In addition to these requirements, the Contractor must submit in the pesticide application the following information:
 - a. Name of the Pest Company
 - b. Virginia approved applicator's license in the appropriate category.
 - c. SDS and label of product being applied. Location of the area that product will be applied.
 - d. Square footage of application.
 - e. Notification to the DPW-EMD at least 48 hours before application date.

Building 9302 will be utilized as the Mayor's Cell (CSA). The third floor of this building will be utilized as billeting for the members assigned Mayor's Cell duties.

Building 12015 Ft Lee Holiday Inn Express is covered under the Emergency In-License Agreement # DACA65-9-21-22 for use by the Army and Department of State concurrently. Floors 4-7 will be utilized to support the Operation Allied Refuge Mission.

5 - Environmental Management Division Manager - Reviewed by*Meets Requirements? No*

1. Updated 09/02/2021 REC based on change in operation including additional buildings for mission support.
2. Working with DPW Director to determine any additional impacts to the environment.
3. Because of the critical nature of the mission information has been difficult to get from the Department of State.
4. IMCOM NEPA Manager SME indicated that there might be an after mission completion EA.
5. Fort Lee has decided to include the mission operation in the Fort Lee Annual Sustainability Report due out in October.

4 - Staff Archeologist - Reviewed by

Meets Requirements? Yes

Project footprint expansion includes an additional four buildings. The following is an addendum to previous cultural resource comments:

Buildings 8133, 8401, and 8402:

Building, object or structure 50 years or older but evaluated and determined ineligible for listing in the NRHP by the Army with SHPO concurrence on file. No ground altering disturbance. SHPO review and comment is not required.

Building 8150:

The Staff Archaeologist has reviewed the undertaking and confirmed that it involves applied use of a building less than 50 years old and that such work will not be within the viewshed of PETE. SHPO review and comment not required.

Determination**Proposed action qualifies for Categorical Exclusion****Categorical Exclusions:**

- B-13: Actions affecting Army property that fall under another federal agency's list of categorical exclusions when the other federal agency is the lead agency (decision maker), or joint actions on another federal agency's property that fall under that agency's list of categorical exclusions (REC required).

Determination Comments:**Signatures**

Appendix B-5

Renaming Operation (2021)

Purpose and Need for Action

The National Defense Authorization Act for Fiscal Year 2021 (the Act) includes the development of a commission that was tasked to “assess the cost of renaming or removing names, symbols, displays, monuments, or paraphernalia that commemorate the Confederate States of America (CSA) or any person who served voluntarily with the CSA.” Fort Lee will be required to undergo this name change effort. The purpose of this action is compliance of the requirement in the Act being used to eliminate names that represent divisiveness in America during the Civil War.

Description of Proposed Action and Alternatives for the Renaming Operation

Several activities will be required to complete this undertaking. Community involvement efforts, changes to systems of record and the renaming or turn-in of any CSA artifacts that still indicate the old name. Some of these activities will take place off-post, since interstate and other road signs will need to be changed. The Act also indicates that the renaming plan must “include procedures and criteria for collecting and incorporating local sensitivities associated with naming or renaming of assets of the Department of Defense.”

Alternatives Considered

The Army analyzed a No Action Alternative. An environmental analysis of a No Action Alternative is required by CEQ regulations to serve as a baseline against which the Proposed Action can be evaluated.

Under the No Action Alternative, the renaming would not occur. This would cause Fort Lee to be non-compliant with the Act.

Actions Eliminated From Detailed Analysis

The only action associated with this analysis is the name change. There are no other actions being eliminated from this discussion.

VEC Analysis

The following analysis was performed utilizing the Capacity Analysis Report, which includes the full description of the baseline information and criteria for determining significance for each of the following VECs.

Significance is determined by examining the potentially affected environment and the degree to which the *proposed action* may affect it. The simple act of renaming the installation and other CSA artifacts that are housed at Fort Lee does not pose risk of impact to human or ecological resources. This analysis focuses on the activities that will be required to change the name on road signs and/or other physical locations where the name Fort Lee or other CSA-era name is currently being used.

The Environmental Consequence Analysis columns have been completed after a thorough review of the Criteria for Determining Significance provided for each VEC in the Capacity Analysis Report.

Environmental Consequences Analysis

The analysis of name-change activities does not indicate potential impact to the following VECs presented in the CAR: Air Quality, Air Space, Government Services, Hazardous, Toxic and Radioactive Substances, Infrastructure, Land Use, Noise, Soil Erosion, Threatened and Endangered Species, Traffic and Transportation, and Water Resources. Therefore, these VECs are not carried forward in formal analysis. Discussion of the two remaining VEC includes Cultural Resources and Socioeconomics.

Table B-5 – Environmental Consequences Analysis

Cultural Resources

Environmental Consequence Analysis – Proposed Action:

The Cultural Resources team at Fort Lee will undoubtedly be affected by the name-change activities, as many of the CSA artifacts at Fort Lee hold Civil War-era cultural significance. Having the PETE as a boundary-sharing neighbor makes it no less significant. Long-term, beneficial impact may be perceived in the context of eliminating CSA-era names. However, it does not appear that significant adverse or beneficial impact within the context of NEPA will be experienced. Fort Lee’s cultural resource personnel will oversee any activities pertaining to cultural resources affected by the name-change effort and ensure SHPO coordination.

Environmental Consequence Analysis– No Action:

There is no impact to cultural resources if the name change does not occur.

Environmental Consequence Analysis – Proposed Action:

The criteria for determining significance for socioeconomic impact includes projects that would create unsafe, discriminatory, or undesirable living conditions for socioeconomically disadvantaged community members or excluding/denying people benefits based on race, color, national origin or income level. It also cites EA 13045, which ensures the protection of Children from Environmental Health and Safety Risks. Please note that 32 CFR 651.39 states that “significant impacts of socioeconomic consequence alone do not merit an EIS.”

The activities required to perform the name changes are not anticipated to impact the socioeconomic status of anyone at Fort Lee or the surrounding area. It is noteworthy, however, to include this discussion as there are anticipated to be a variety of public opinions with this type of change. Fort Lee is heavily incorporating the community in their plans to implement the name change. Community outreach, a reception, focus groups, briefings and soliciting community recommendations are all part of Fort Lee’s public involvement plans.

Environmental Consequence Analysis– No Action:

No action would mean the name change would not occur, resulting in non-compliance of the Act, but no impact to socioeconomic considerations.

Causal Relationships

The CEQ regulations stipulate that a causal relationship analysis within an EA should consider those “effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives. Such

impacts can result from individually minor but collectively significant actions taking place over a period of time.” The “causal relationship” terminology supersedes use of the term “cumulative effects” which had been used in analysis until the July 2020 update to 40 CFR 1508.

An effort has been made to identify all actions that are being considered and that are in the planning phase at this time. To the extent that details regarding such actions exist and the actions have a potential to interact with the Proposed Action and the No Action Alternative, these actions are included in this analysis. This approach enables decision makers to have the most current information available so that they can evaluate the environmental consequences of the Proposed Action and the No Action Alternative.

There are four additional proposed actions at Fort Lee which may be implemented at the same time as the Proposed Action. These are the implementation of the INRMP, implementation of the ICRMP, the implementation of the IPMP, and Operation Allies Welcome.

The Proposed Action would result in the effects identified in Table B-5. There are no anticipated significant impacts.

There is no causal relationship between the proposed action and the additional four proposed actions that may be implemented at the same time.