# Enhanced Sustainability

## 2025 Annual Report

**Fort Lee**

Prepared By:

U.S. Army Fort Lee, Virginia

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# List of Acronyms

| | |
|---|---|
| ACP | Access Control Point |
| AR | Army Regulation |
| ADFSD | Arial Delivery and Field Services Department |
| AVB/PVB | Active Vehicle Barrier/Passive Vehicle Barrier |
| BMP | Best Management Practice |
| BRAC | Base Realignment and Closure |
| CAR | Capacity Analysis Report |
| CBPA | Chesapeake Bay Preservation Act |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| CFOC | Confidence Obstacle Course |
| EA | Environmental Assessment |
| EIS | Environmental Impact Statement |
| EMD | Environmental Management Division |
| EO | Executive Order |
| EPA | Environmental Protection Agency |
| FES | Fire and Emergency Services |
| IPaC | Information for Planning and Consultation |
| 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 |
| REC | Record of Consideration |
| RPA | Resource Protection Area |
| RV | Recreational Vehicle |
| SI | Site Investigation |

| | |
|---|---|
| SF | Square Foot |
| SOP | Standard Operating Procedures |
| TAA | Tactical Assembly Area |
| TA4 | Training Area 4 |
| TA-27 | Training Area 27 |
| TDY | Temporary Duty |
| TMDL | Total Maximum Daily Load |
| TRADOC | Training Doctrine Command |
| TSF | Training Support Facility |
| UFC | Unified Facilities Criteria |
| VEC | Valued Environmental Component |
| VESMP | Virginia Erosion and Stormwater Management Program |

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# Signature

Based on my review of the facts and analyses contained in the attached Environmental Sustainability Annual Report, conducted under the provisions and guidance of NEPA, CEQ Regulations, and 32 CFR § 651, I conclude that the analysis performed herein (with six sites meeting Categorical Exclusion criteria and one site requiring analysis), with reference to the Fort Lee 2025 Capacity Analysis Report, for the following proposed actions would not have a significant environmental impact, either by themselves or cumulatively with other known projects at Fort Lee:

- Sisisky Gate Active Vehicle Barriers
- Confidence Obstacle Course /TA-27
- AVB/PVB Project at Gregg Ave Gate
- RV TRAVEL CAMPGROUND (50 SITES)
- Aerial Delivery and Field Services Department (ADFSD) Training Facility
- FIRE & RESCUE TRAINING FACILITY (GAR)
- TA-26 Turn Pad project

Accordingly, an Environmental Impact Statement is not required. The signing of this ESAR completes the environmental impact analysis as determined by the results of the Environmental Assessment performed on this process dated February, 2017.

RICHARD J. BENDELEWSKI
COL, MI
Commanding

# Introduction

## Welcome to the 2025 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: https://home.army.mil/lee/index.php/about/Garrison/directorate-public-works/environmental-management.

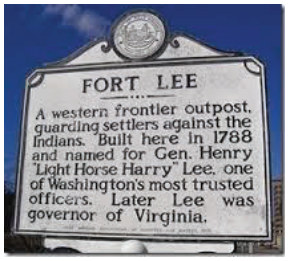
If a new, unplanned action is added sometime throughout the year, the Capacity Analysis Report will be used to perform analysis and determine if the new action will significantly impact any of the VECs. If yes, project-specific NEPA analysis and documentation will be required. If no immediate or cumulative 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 U.S. Army in 1962, Fort Lee was designated a Class 1 military installation under the Second United States Army and was renamed the U.S. 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 U.S. Army Quartermaster Center and Fort Lee was re-designated the U.S. 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

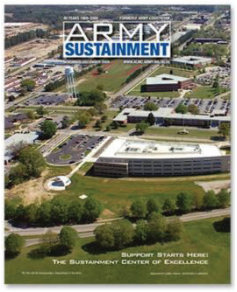
combat development and training development.

On April 27, 2023, Fort Lee became known as Fort Gregg-Adams, honoring two Black officers who excelled in the field of sustainment and made significant marks in U.S. Army history. In June, 2025, the installation's name was restored to Fort Lee, honoring Private Fitz Lee, who received the Medal of Honor for heroism during the Spanish-American War.

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 (February 2025):** 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 (dated February 2025) has allowed EMD to cover and expand the growth and program needs to a wider community on Fort Lee.

## NEPA Implementing Regulations

### 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.

At a minimum, public involvement should include the following:

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| 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 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 |

One 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:

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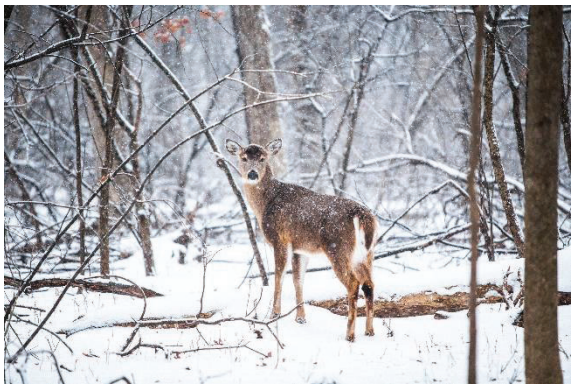
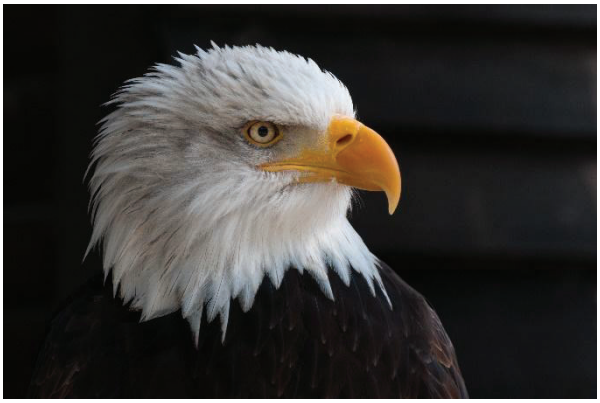
|---|
| Existing Opportunities - The MI-EMS required training, stakeholder coordination (regulatory, community leadership), environmental team and quarterly meetings with civilian-neighbor community groups |
| Fact Sheets |
| Public Notices (local newspaper outlets) |
| Public comment periods |
| Public 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 REC 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: https://home.army.mil/lee/index.php/about/Garrison/directorate-public-works/environmental-management.

# Valued Environmental Components

As described in the introduction of this document, each 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. 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.

# Current Project Analysis Summary

Use of this 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. The following is a summary of the projects analyzed in July, 2025.

The focus of this July 2025 analysis is the following seven projects, six of which are known or assumed (at this stage in their planning) to meet Categorical Exclusion (CATEX) criteria. A REC has been prepared for each project meeting CATEX criteria, presented in Appendix B-1. One project, the Recreational Vehicle Park, requires analysis due to project footprint size (greater than 5 acres); the analysis for it is included as appendix B-2. Cumulative effects of these seven projects are included in Appendix B-3.

**Active Vehicle Barrier/Passive Vehicle Barrier (AVB/PVB) Project At Gregg Ave Gate** Passive/active vehicle barriers (center islands and ballistic guard booths) will be installed at Gregg Avenue Gate access control point (ACP).

**Aerial Delivery and Field Services Department (ADFSD) Training Facility**

This project is required to provide an essential training facility with administrative space for modern and effective instruction programs for the Enlisted Parachute Rigger, Aerial Delivery and Material Officers, the Enlisted Field Services, the Sling Load Inspector Certification, and the Air Load Inspector Certification Courses. ADFSD is currently occupying five facilities (four are WWII-era buildings) that are scattered, requiring soldiers to travel from facility to facility thus creating logistical problems and resulting in disjointed training. The current training classrooms cannot accommodate instructional equipment and are overcrowded.

**Confidence Obstacle Course (CFOC) (with covered bleachers)**

A Confidence Obstacle Course (CFOC) and sheltered bleacher area with lightning protection is planned for construction. The CFOC will consist of twenty-four obstacle stations. Directional and obstacle signage will be provided to guide soldiers through the entire course. A ten-foot wide maneuver trail between obstacles will be provided to support training or emergency vehicle movement through the course, to include the ability to bypass an obstacle on one side. A

Tactical Assembly Area (TAA) of roughly half of an acre will be cleared in the center of the course and an entrance trail from TA-27 will be constructed. Gravel and fill dirt will be added to provide drainage away from the course and create a flat surface for all cleared areas. Facilities will be designed to a minimum life of 40 years in accordance with DoD's Unified Facilities Criteria (UFC 1-200-02) including energy efficiencies, building envelope and integrated building systems performance.

### Fire and Emergency Services (FES) Site

The architectural design for the FES Site at Fort Lee consists of a standalone facility to conduct classroom education. The facility will include two 30-occupant classrooms separated by a removable partition, an outdoor covered bleacher area for education and recovery after outdoor training, restroom facilities to accommodate the indoor and outdoor training (including a shower), a break room, and garage storage for outdoor training equipment.

### Recovery Range Concrete Turn Pads

The project consists of the design and construction of improvements to the existing vehicle recovery course training facility at Fort Lee. Due to the degradation of the course road network from heavy use and drainage issues, especially in the areas where tracked vehicles make sharp turns, it was determined that road repair and improvements were needed. The primary repairs will be the addition of the compacted stone to the trail surface and the addition of concrete pads (24-32) at trail intersections. The addition of the concrete pads will help minimize rail degradation in the most heavily impacted areas. The specific design features include repair exiting dirt road (~ 106,616 linear feet) with compacted stone, add four new entrances to the various training areas with concrete culverts, improve 19 existing concrete culvers and construct 24-32 concrete turning pads for tracked and wheeled vehicles to safely conduct recovery operations. Total proposed land disturbance areas is 4.74 acres. (Fort Lee, Virginia, Vehicle Recovery Range 65% design [P2-516440] dated October 2024).

### Recreational Vehicle (RV) Park

A new RV Park with necessary support elements is required to offer more adequate facilities for transient/Temporary Duty (TDY) military personnel, individuals attending schools at Fort Lee, reservists and their families at the installation for annual training, vacationing personnel (to include active duty and retired military), and any other authorized patrons who may wish to engage in camping activities. RV Park to support 30,000+ TDY students per year and authorized Military and Civilian eastern seaboard travelers on Interstate 95 and 295.

### Sisisky Gate Active Vehicle Barriers

Active Vehicle Barriers will be installed to align with previously installed passive barriers per the U.S. Army Corps of Engineers design, as well as ballistic booths and control mechanisms to complete the ACP.

# 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

Fort Gregg-Adams, 2024. Environmental Planning Services Capacity Analysis Report.

Fort Lee, 2025. Fort Lee Environmental Special Conditions Standard Operating Procedures (SOP), February, 2025. Accessible at: https://home.army.mil/lee/9017/6477/8434/2025-Environmental-Special-Conditions.pdf

# Appendix A

## 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' 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 |
|---|---|---|---|
| Agency Commitment:<br><br>Provide parties with comprehensive, accurate and timely information about its NEPA decision-making. | Agency Commitment:<br><br>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. | Agency Commitment:<br><br>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. | Agency Commitment:<br><br>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. |

| Inform | Consult | Involve | Collaborate |
|---|---|---|---|
| Agency Goal:<br><br>Provide sufficient objective information for parties to understand the issues being addressed through the NEPA process. | Agency Goal:<br><br>Obtain feedback on issues in NEPA process, the alternatives considered, and the analysis of impacts. | Agency Goal:<br><br>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 | Agency Goal:<br><br>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. |
| Case Example:<br><br>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. | Case Example:<br><br>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. | Case Example:<br><br>Grand Canyon National Park, Colorado River Management Plan: Scoping meetings held throughout country to shape | Case Example:<br><br>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. |
| NEPA Phase:<br><br>Scoping, draft and final review and comment period.<br><br>Processes:<br><br>Fact Sheets, Newsletter, Web Site, Open House, Panel Presentations, Public Meetings. | NEPA Phase:<br><br>All phases.<br><br>Processes:<br><br>Notice and Comment, Surveys, Focus Groups, Consolation, Tribal, State, Public Meetings. | NEPA Phases:<br><br>All Phases.<br><br>Processes:<br><br>Workshops, Deliberate Polling, Individual and/or group consultations, advisory committee. | NEPA Phases:<br><br>All Phases.<br><br>Processes:<br><br>Individual and/or group consultations, advisory committee, consensus-building, facilitation, interagency working groups, mediation, joint fact finding. |

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 |
|---|---|---|
| "Inform"<br><br>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. | Inexpensive, easy to implement, agency-led information control.<br><br>Best used when there is low concern/high trust relationship between the agency and the surrounding community. | Limited means for community to provide input.<br><br>If high concern/low trust relationship exists between the agency and the surrounding community exists, this option could be negatively perceived. |
| "Consult"<br><br>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. | Inexpensive, easy to implement, agency-led information control, provides the community a means to communicate their thoughts through comment/comment response.<br><br>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. | 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. |

| | | |
|---|---|---|
| "Involve"<br><br>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. | 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.<br><br>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. | 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. |

| Activity | Pros | Cons |
|---|---|---|
| **"Collaborate"**<br><br>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. | This option provides the greatest amount of opportunity for the public to be involved with NEPA projects.<br><br>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.<br><br>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. | This option comes at a greater monetary cost than the other three.<br><br>There is a need for dedicated personnel to manage the collaboration activities.<br><br>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. |

# Appendix B-1

## Appendix B-1 - Records of Consideration for Five Proposed Actions

# RECORD OF ENVIRONMENTAL CONSIDERATION

PROJECT TITLE: Aerial Delivery and Field Services Department (ADFSD) Training Facility

PROJECT PROPONENT: U.S. Army Quartermaster Corps & School (Raymond Beu, POC)

BRIEF PROJECT DESCRIPTION: This project is required to provide an essential training facility with administrative space for modern and effective instruction programs for the Enlisted Parachute Rigger, Aerial Delivery and Material Officers, the Enlisted Field Services, the Sling Load Inspector Certification, and the Air Load Inspector Certification Courses. ADFSD is currently occupying five facilities (four are WWII-era buildings) that are scattered, requiring soldiers to travel from facility to facility thus creating logistical problems and resulting in disjointed training. The current training classrooms cannot accommodate instructional equipment and are overcrowded.

START/END DATE (PROJECT DURATION): March 2026 to March 2027

REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION (complete a. or b.):

a. Analysis completed using Capacity Analysis Report. Analysis documentation and Capacity Analysis Report uploaded to http://aec.army.mil/Services/Support/NEPA.aspx on _____. It will be consolidated into the 2025 Enhanced Sustainability Annual Report, which will also available on the aforementioned website.

**b. Project is categorically excluded (CX) under the provisions of 32 CFR Part 651 Appendix B, Section II *List of CXs*, (c)(1), with no extraordinary circumstances: "Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required)." Justification for use of CX is as follows: The estimated area to be disturbed is 2.5 acres.**

**A Section 106 consultation remains a separate requirement.**

Signature James Alan Mills

Chief, DPW Environmental Division

Date: 3/4/26

# RECORD OF ENVIRONMENTAL CONSIDERATION

PROJECT TITLE: Confidence Obstacle Course (CFOC)

PROJECT PROPONENT: Range Control (Tom Taylor)

BRIEF PROJECT DESCRIPTION: A Confidence Obstacle Course (CFOC) and sheltered bleacher area with lightning protection is planned for construction. The CFOC will consist of twenty-four obstacle stations. Directional and obstacle signage will be provided to guide soldiers through the entire course. A ten-foot wide maneuver trail between obstacles will be provided to support training or emergency vehicle movement through the course, to include the ability to bypass an obstacle on one side. A Tactical Assembly Area (TAA) of roughly half of an acre will be cleared in the center of the course and an entrance trail from TA-27 will be constructed. Gravel and fill dirt will be added to provide drainage away from the course and create a flat surface for all cleared areas. Facilities will be designed to a minimum life of 40 years in accordance with DoD's Unified Facilities Criteria (UFC 1-200-02) including energy efficiencies, building envelope and integrated building systems performance.

START/END DATE (PROJECT DURATION): March 2024 to March 2025

REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION (complete a. or b.):

c. Analysis completed using Capacity Analysis Report. Analysis documentation and Capacity Analysis Report uploaded to http://aec.army.mil/Services/Support/NEPA.aspx on _____. It will be consolidated into the 2025 Enhanced Sustainability Annual Report, which will also available on the aforementioned website.

**d. Project is categorically excluded (CX) under the provisions of 32 CFR Part 651 Appendix B, Section II *List of CXs*, (c)(1), with no extraordinary circumstances: "Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required)." Justification for use of CX is as follows: The estimated area to be disturbed is 1.79 acres.**

**Section 106 consultation was completed on February 11, 2020 for the size and location depicted in a REC dated January 7, 2020 (Attachment A). If the construction plans changed after January 7, 2020, additional consultation will be required.**

**Please note potential Virginia Erosion and Stormwater Management Program (VESMP) permitting requirements and the performance of an appraisal by the U.S. Army Corps of Engineers, Norfolk District to assess the monetary value (and payment to the Government) of any removed timber.**

Signature James Alan Mills

Chief, DPW Environmental Division

Date: 3/4/26

Attachment A: Record of Environmental Consideration dated January 7, 2020

## Attachment A: Confidence Course Record of Environmental Consideration

### Record of Environmental Consideration
### Build New Confidence Course

**Project Information**

**Project Number:** RP000320J
**Tracking Number:** 8522
**Title of Proposed Action:** Build New Confidence Course
**Due Date:** 2020-01-12
**Proponent:** Tom Taylor
**Fiscal Year:** 2020
**Organization** Range Control
**Date of Request:** 2020-01-07
**Category:** 4283 - Work Order Review

**Attachments:** RP00032-20_ATTACHMENT 1.pptx
2020.PA269 SHPO Comments.pdf

**Purpose and Need of Action:**
Build New Confidence Obstacle Course; Acquire Design plan and build Confidence Obstacle Course (COC) FCC 17950, in T A-27; this course will be 4 quadrant clover design with 24 obstacles as written in FM 7-22, page E-I2, para E-54:"Training Facilities," Corps of Engineers, Drawing number 28-13-95. See attached map for location, station, and build design example. Additionally facility requires a Sheltered Bleacher area with lighlening protection, and all directional & obstacle course signage to negotiate course.; 17950

**Program Review**

**2 - Air Program Manager - Reviewed by**
*Meets Requirements? No*
If lighting is needed during training at obstacle course, it is recommended to include light posts into design to reduce emissions from portable diesel-powered light sets.

**2 - Air Quality Specialist - Reviewed by**
*Meets Requirements? Yes*
No concerns

**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? No*
Ground disturbance of an acre or more may require a VSMP construction permit, this includes clearing and grubbing trees in an area of an acre or more.

Installation of 5000 sq. ft. or more of new impervious surface will require conformance with the requirements set out under Section 438 of the Energy Independence and Security Act (http://water.epa.gov/polwaste/nps/section438.cfm). The Army guide for implementation "Army Low Impact Development - Technical User Guide - 4 January 2013" can be found at (http://www.usace.army.mil/Portals/2/docs/Sustainability/Hydrology_LID/Army_LID_Technical_User_Guide_January

2013.pdf). In general, development >5000 square feet must either retain the 95th percentile rainfall event on site, or use a site-specific hydrological analysis to determine the pre-development hydrology. A justification must be provided if this requirement cannot be met. The plan for stormwater management must be submitted to DPW-EMD for review.

**2 - Stormwater - Reviewed by**

*Meets Requirements? No*

For projects involving ground disturbance <2500 square feet - Install appropriate Erosion and Sediment Controls to prevent sediment from being washed into the storm sewer
For projects involving ground disturbance =>2500 square feet- Submit Erosion and Sediment Control Plan, in accordance with the requirements of the Virginia Erosion and Sediment Control regulation, to DPW-EMD for review and approval.

For projects involving ground disturbance >5000 square feet- Project must demonstrate conformance with the requirements set out under Section 438 of the Energy Independence and Security Act (http://water.epa.gov/polwaste/nps/section438.cfm). The Army guide for implementation "Army Low Impact Development - Technical User Guide - 4 January 2013" can be found at (http://www.usace.army.mil/Portals/2/docs/Sustainability/Hydrology_LID/Army_LID_Technical_User_Guide_January 2013.pdf). In general, development >5000 square feet must either retain the 95th percentile rainfall event on site, or use a site-specific hydrological analysis to determine the pre-development hydrology. A justification must be provided if this requirement cannot be met. The plan for stormwater management must be submitted to DPW-EMD for review.

For projects involving ground disturbance >1 Acre - Prepare and submit application for coverage under Virginia Stormwater Management Permit (VSMP) program (http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx). Application must be approved by VA DEQ and coverage letter received prior to beginning land disturbance. Submit Erosion and Sediment Control Plan to DPW-EMD for review and approval (http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/ErosionandSedimentControl.aspx). Approval must be secured before beginning land disturbance. Submit Storm Water Pollution Prevention Plan (SWPPP) to DPW-EMD for review. Plan must demonstrate that the post-development site condition meets the standards set forth in the Virginia Storm Water Management regulation.

**3 - P2 Team Lead - Reviewed by**

*Meets Requirements? Yes*

All Construction & Demolition (C&D) solid waste debris that is not contaminated with lead and/or asbestos will be recycled/reused to the maximum extent possible. For FY20, recycling a minimum of 70% of all solid waste is mandated on this project. If recycling 70% is determined to be impractical, a memorandum stating how the determination was made must be submitted to EMD prior to work beginning. The project manager will ensure all solid waste that is recycled/reused is reported to EMD per requirements of the "Fort Lee Environmental Special Conditions Package" as part of the contract for this project.

**3 - Recycling / Solid Waste - Reviewed by**

*Meets Requirements? No*

All Construction & Demolition (C&D) solid waste debris that is not contaminated with lead and/or asbestos will be recycled/reused to the maximum extent possible. For FY20, recycling a minimum of 70% of all solid waste is mandated on this project. If recycling 70% is determined to be impractical, a memorandum stating how the determination was made must be submitted to EMD prior to work beginning. The project manager will ensure all solid waste that is recycled/reused is reported to EMD per requirements of the "Fort Lee Environmental Special Conditions Package" as part of the contract for this project.

**4 - Conservation Team Lead - Reviewed by**

*Meets Requirements? Yes*

Before clearing can commence, there will have to be an appraisal by the Norfolk District USACE forester to assess the value of the timber. That amount will have to be paid to the Government upon timber removal.

**4 - Cultural Resource Manager - Reviewed by**

*Meets Requirements? Yes*

The CRM has reviewed the undertaking and determined it to be entirely within a low probability area. However, the project involves new construction and requires Section 106 consultation.

Section 106 Consultation Initiated 01/15/20.

Section 106 Consultation Completed 02/11/20 for the size and location depicted in this NEPA record. Any changes will require additional consultation.

**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 that is to be used 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. 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.
********** If you have environmental questions please contact Rick Rockford @ richard.g.rockford.civ@mail.mil

**Determination**

**Proposed action qualifies for Categorical Exclusion**

**Categorical Exclusions:**

- C-1: Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required).

**Determination Comments:**

**Signatures**

[redacted]

# RECORD OF ENVIRONMENTAL CONSIDERATION

PROJECT TITLE: Fire and Emergency Services (FES) Site

PROJECT PROPONENT:

BRIEF PROJECT DESCRIPTION: The architectural design for the FES Site at Fort Lee consists of a standalone facility to conduct classroom education. The facility will include two 30-occupant classrooms separated by a removable partition, an outdoor covered bleacher area for education and recovery after outdoor training, restroom facilities to accommodate the indoor and outdoor training (including a shower), a break room, and garage storage for outdoor training equipment.

START/END DATE (PROJECT DURATION): Fiscal Year 2027

REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION (complete a. or b.):

e. Analysis completed using Capacity Analysis Report. Analysis documentation and Capacity Analysis Report uploaded to http://aec.army.mil/Services/Support/NEPA.aspx on _____. It will be consolidated into the 2025 Enhanced Sustainability Annual Report, which will also available on the aforementioned website.

**f. Project is categorically excluded (CX) under the provisions of 32 CFR Part 651 Appendix B, Section II *List of CXs*, (c)(1), with no extraordinary circumstances: "Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required)." Justification for use of CX is as follows: The estimated area to be disturbed is 2.12 acres.**

**Section 106 consultation remains a separate requirement.**

Signature James Alan Mills

Chief, DPW Environmental Division

Date: 3/4/26

Attachment A: Record of Environmental Consideration dated March 10, 2023

Attachment A: Fire & Emergency Services Record of Environmental Consideration



# Record of Environmental Consideration

## Project Information

**Project Number:** PM236123J
**Tracking Number:**
**Title of Proposed Action:**

Design Purchase Install of Various Components at FES Training Area at the Fort Lee Range

**Due Date:** 3/17/23
**Proponent:** Asst. Chief John Maskelony (804)479-0551/765-3990
**Fiscal Year:** 3
**Organization:** Fire & Emergency Services
**Buildings:** 17182
**Date of Request:** 3/10/23
**Category:** Program Review
**Purpose and need of action:**

PLEASE REVIEW THE 100% DRAWINGS IN FOLDER: S:\DPWL\Private\FY_2023_Active Year\DIV_EMD\NEPA - REC 2018-2021\Open RECs\FES TA-7 100% Design Design/purchase/installation of: 1) Classroom (Approximately 30 people, with mudroom and bathroom, and electrical service) 2) Covered pavilion attached to or directly next to entrance of classroom (on concrete pad with enough area for bleachers to accommodate approximately 30 people) 3) Concrete pad to support live fire training facility, and 4) Live fire training facility. All components will be located at the existing Fire & Emergency Services Area at the Fort Lee Range.

## Program Review

**NEPA:**

PLEASE SEE AIR QUALITY, COMPLIANCE, AND CULTURAL RESOURCES COMMENTS.
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.
Conditionally approved for routing to execution lanes.
Must be returned to EMD with full SOW and detailed maps for final approval. Once returned to EMD, WO may be subject to a 45 day waiting period for SHPO consultation.

**Air Quality:**

100% Comments:

Suggest the use of low VOC paint, primer, and/or adhesive materials as well as the use of sustainable products when possible within scope.

Per Condition 14 of the permit dated 11/2/22: Fugitive emission controls shall include the following, or equivalent, as approved by DEQ:
a. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.
b. Open equipment for conveying or transporting materials likely to create objectionable air pollution when airborne shall be covered, or treated in an equally effective manner at all times when in motion.
Dust shall be controlled during construction and may not leave the site.

**Asbestos & Lead:**

100% Comments:

No concerns. Change Fort Lee to Fort Gregg-Adams

**Compliance/Stormwater:**

100% Comments: No additional comments

For projects involving ground disturbance >5000 square feet- Project must demonstrate conformance with the requirements set out under Section 438 of the Energy Independence and Security Act(http://water.epa.gov/polwaste/nps/section438.cfm). The Army guide for implementation "Army Low Impact Development- Technical User Guide - 4 January 2013" can be found at (http://www.usace.army.mil/Portals/2/docs/Sustainability/Hydrology_LID/Army_LID_Technical_User_Guide_January2013.pdf). In general, development >5000 square feet must either retain the 95th percentile rainfall event on site, or use a site-specifichydrological analysis to determine the pre-development hydrology. A justification must be provided if this requirementcannot be met. The plan for stormwater management must be submitted to DPW-EMD for review.

For projects involving ground disturbance >1 Acre - Prepare and submit application for coverage under Virginia StormwaterManagement Permit (VSMP) program (http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx ). Application must be approved by VA DEQ and coverage letter received prior to beginning land disturbance. Submit Erosionand Sediment Control Plan to DPW-EMD for review and approval(http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/ErosionandSedimentControl.aspx ). Approval mustbe secured before beginning land disturbance. Submit Storm Water Pollution Prevention Plan (SWPPP) to DPW-EMD forreview. Plan must demonstrate that the post-development site condition meets the standards set forth in the VirginiaStorm Water Management regulation.

**Pollution Prevention:**

100% Comments:

No concerns

**Conservation:**

100% Comments: No concerns.

**Cultural Resources:**

100% Comments: New construction; Section 106 Consultation Required.
Section 106 Consultation Initiated 04/09/24.
Section 106 Consultation Completed 05/02/24.

12/28/23: Cultural Resource comments remain the same. Consultation will be required, but will be initiated when the the plans are further along.

As a note, maximum footprint and depth of ground disturbance for all components including building(s), infrastructure, and utility connections is REQUIRED BEFORE consultation can be initiated.

APPROVAL FOR DESIGN ONLY.

The project's potential to cause effects on historic properties cannot be evaluated until all requirements are known.

Sufficiently BEFORE executing any work, a SOW and scaled location map showing the proposed work and all associated ground altering disturbance must be submitted for review and approval.

Additionally, as new construction, Section 106 consultation under the National Historic Preservation Act will be required.

**Determination**

| | Yes | No |
|---|---|---|
| **Proposed action qualifies for a categorical exclusion** | ☑ | ☐ |

**Categorical Exclusions:**

C-1: Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required).

**Notes:**

[redacted]

# RECORD OF ENVIRONMENTAL CONSIDERATION

PROJECT TITLE: Recovery Range Turn Pad Project

PROJECT PROPONENT: Jeffrey W. Crawford

BRIEF PROJECT DESCRIPTION: The project consists of the design and construction of improvements to the existing vehicle recovery course training facility at Fort Lee. Due to the degradation of the course road network from heavy use and drainage issues, especially in the areas where tracked vehicles make sharp turns, it was determined that road repair and improvements were needed. The primary repairs will be the addition of the compacted stone to the trail surface and the addition of concrete pads (24-32) at trail intersections. The addition of the concrete pads will help minimize rail degradation in the most heavily impacted areas. The specific design features include repair exiting dirt road (~ 106,616 linear feet) with compacted stone, add four new entrances to the various training areas with concrete culverts, improve 19 existing concrete culvers and construct 24-32 concrete turning pads for tracked and wheeled vehicles to safely conduct recovery operations. Total proposed land disturbance areas is 4.74 acres. (Fort Gregg-Adams, Virginia, Vehicle Recovery Range 65% design [P2-516440] dated October 2024)

START/END DATE (PROJECT DURATION): To be determined

REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION (complete a. or b.):

g. Analysis completed using Capacity Analysis Report. Analysis documentation and Capacity Analysis Report uploaded to http://aec.army.mil/Services/Support/NEPA.aspx on _____. It will be consolidated into the 2025 Enhanced Sustainability Annual Report, which will also available on the aforementioned website.

**h. Project is categorically excluded (CX) under the provisions of 32 CFR Part 651 Appendix B, Section II *List of CXs*, (c)(1): "Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required)." Justification for use of CX is as follows: Total proposed land disturbance areas is 4.74 acres.**

**A program review resulting in a REC at 65% design was developed and signed dated October, 2024 (Attachment A). That review indicated need for Section 106 consultation and installation of any needed erosion and sediment control measures to protect the storm water system while work is underway, with disturbed areas restored and stabilized.**

Signature: James Alan Mills
Chief, DPW Environmental Management

Date: 3/4/26

Attachment A: Record of Environmental Consideration (at 65% project design) dated October, 2024

## Attachment A: Recovery Road Turn Pads Record of Environmental Consideration at 65% project design



# Record of Environmental Consideration

**Project Information**

**Project Number:** OD000305J
**Tracking Number:**
**Title of Proposed Action:**

Install concrete turn pads & reconfigure road network and drainage for the Recovery Range

**Due Date:** 1/21/25
**Proponent:** Jeffrey W. Crawford
**Fiscal Year:** 5
**Organization:** US Army Ordnance School
**Buildings:** 17500
**Date of Request:** 1/14/25
**Category:** Program Review
**Purpose and need of action:**

As per the USACE design, install 24-32 concrete turning pads, repair and reconfigure the vehicle maneuvering range road network and repair and reconfigure the culverts and drainage for the range. The USACE should have a 100% design out by end of Jan 25 for review.

Please review 65% drawings.

**Program Review**

**NEPA:**

PLEASE SEE CULTURAL RESOURCES AND STORMWATER COMMENTS.
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.
All work must comply with the environmental special conditions.
https://home.army.mil/greggadams/application/files/4816/8779/0508/Environmental-Special-Conditions-2023.pdf
Conditionally approved for routing to execution lanes.
Must be returned to EMD with full SOW and detailed maps for final approval. Once returned to EMD, WO may be subject to a 45 day waiting period for SHPO consultation.

**Air Quality:**

No concern

65%:3/18/25 no concerns

**Asbestos & Lead:**

No concern

65%:3/18/25 no concerns

**Compliance:**

No concerns. See Stormwater comments

65%: 3/18/25 - no concerns

**Pollution Prevention:**

No concern

65%:3/18/25 no concerns

**Conservation:**

No concerns.

65%: No concerns.

**Cultural Resources:**

APPROVAL FOR DESIGN ONLY

The project's potential to cause effects on historic properties cannot be evaluated until all requirements are known. Sufficiently BEFORE executing any work, a SOW and scaled location map showing the proposed work and all associated ground altering disturbance must be submitted for review and approval.
Additionally, as new construction, Section 106 consultation under the National Historic Preservation Act will be required

65%: New construction; Section 106 Consultation Required. ADDITIONAL INFORMATION NEEDED on maximum depth of ground disturbance for culvert installation before consultation can be initiated.

**Stormwater:**

Install any needed erosion and sediment control measures to protect the storm water system while work is underway. Restore and stabilize any disturbed areas.

65%:Install any needed erosion and sediment control measures to protect the storm water system while work is underway. Restore and stabilize any disturbed areas.

| Determination | Yes | No |
|---|---|---|
| Proposed action qualifies for a Categorical Exclusion | ☑ | ☐ |

**Categorical Excusions**

C-1: Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required).

**Notes**

[redacted]

# RECORD OF ENVIRONMENTAL CONSIDERATION

PROJECT TITLE: Sisisky Gate Active Vehicle Barriers

PROJECT PROPONENT: James Wilson

BRIEF PROJECT DESCRIPTION: Work is to install Active Vehicle Barriers to align with previously installed passive barriers per the U.S. Army Corps of Engineers design, as well as ballistic booths and control mechanisms to complete the access control point (ACP).

A program review resulting in a Record of Environmental Consideration (REC) at 65% design was developed and signed dated May 17, 2024 (Attachment A). That review indicated need for dust suppression, addition of generators to the existing air permit (prior to purchase), and completion of Section 106 consultation due new actions not previously reviewed during the original passive barrier system footprint.

START/END DATE (PROJECT DURATION): September 15, 2023 to July 31, 2024

REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION (complete a. or b.):

i. Analysis completed using Capacity Analysis Report. Analysis documentation and Capacity Analysis Report uploaded to http://aec.army.mil/Services/Support/NEPA.aspx on _____. It will be consolidated into the 2025 Enhanced Sustainability Annual Report, which will also available on the aforementioned website.

**j. Project is categorically excluded (CX) under the provisions of 32 CFR Part 651 Appendix B, Section II *List of CXs*, (c)(1): "Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required)." Justification for use of CX is as follows: The total disturbed area is less than one acre.**

**A program review resulting in a REC at 65% design was developed and signed dated May 17, 2024 (Attachment A). That review indicated need for dust suppression, addition of generators to the existing air permit (prior to purchase), and completion of Section 106 consultation due new actions not previously reviewed during the original passive barrier system footprint.**

Signature James Alan Mills

Chief, DPW Environmental Management

Date: 3/4/26

Attachment A: Record of Environmental Consideration (at 65% project design) dated May 17, 2024

## Attachment A: Sisisky Gate Active Vehicle Barriers



# Record of Environmental Consideration

**Project Information**

**Project Number:** PM005104J
**Tracking Number:**
**Title of Proposed Action:**

Sisisky Gate Active Vehicle Barriers

**Due Date:** 5/21/24
**Proponent:** JAMES WILSON
**Fiscal Year:** 4
**Organization:** DES / PHYSICAL SECURITY
**Buildings:**
**Date of Request:** 5/14/24
**Category:** Program Review
**Purpose and need of action:**

Work is to install Active Vehicle Barriers to align with previously installed passive barriers per the USACE engineer design, as well as ballistic booths and control mechanisms to complete the ACP. Actual contract through the Corps of Engineers.

Please review 65% drawings:

**Program Review**

**NEPA:**

PLEASE SEE AIR QUALITY AND COMPLIANCE COMMENTS.
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.
All work must comply with the environmental special conditions.
https://home.army.mil/greggadams/application/files/4816/8779/0508/Environmental-Special-Conditions-2023.pdf
Conditionally approved for routing to execution lanes.
Must be returned to EMD with full SOW and detailed maps for final approval. Once returned to EMD, WO may be subject to a 45 day waiting period for SHPO consultation.

**Air Quality:**

Dust suppression will be required for this project. Water is available, but the equipment is under the project contract. The dust control equipment must remain on site. The project manager is responsible to ensure the site is properly managed.

65%:Same comments as previous

**Asbestos & Lead:**

No concern

65%: No concern

**Compliance:**

Installation of backup generators (if any) will require EMD review and approval. Generators must be added to the Air Permit prior to purchase.

65%:
Design Analysis Sect 3-1.1: narrative indicates new transformer will be needed to provide required electrical capacity for the project and the lead time is 50+ weeks. It appears there is a power deficit of 35 kVA (?) that the contractor will turn over to the Gov't until the new transformer is available. Indicates a quick connect and portable generator (provided by others -who? FGAV?) may be needed in the interim to cover this deficit power. We will need a plan to cover this issue to determine how a generator would be used and what changes would need to be made to our Air Permit to cover this potential temporary new emissions source.

**Pollution Prevention:**

No concern

65%: No concern

**Conservation:**

No concerns.

65%: No concerns.

**Cultural Resources:**

7/23/24: Project in the similar footprint as passive barrier system but includes new actions. Section 106 consultation required. However, considering the active and passive systems are components for a complete security system of the same gate, the addition of the active system can be considered a revision of the previous consultation.

Revised Section 106 consultation initiated: 07/30/24
Revised Section 106 consultation completed: 08/20/24

APPROVAL FOR DESIGN ONLY

The project's potential to cause effects on historic properties cannot be evaluated until all requirements are known.

Sufficiently BEFORE executing any work, a SOW and scaled location map showing the proposed work and all associated ground altering disturbance must be submitted for review and approval.

Additionally, as new construction, Section 106 consultation under the National Historic Preservation Act will be required.

65%: 65% plans are consistent with scope from previous consultation. No additional consultation is necessary at this time. However, changes to footprint or actions within the APE in later plans may require additional consultation.

**Stormwater:**

No concerns

65%:No concerns

| Determination | Yes | No |
|---|---|---|
| Proposed action qualifies for a Categorical Exclusion | ☑ | ☐ |

**Categorical Excusions**

C-1: Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required).

**Notes**

[redacted]

# RECORD OF ENVIRONMENTAL CONSIDERATION

PROJECT TITLE: AVB/PVB Project at Gregg Avenue Gate

PROJECT PROPONENT: James Wilson

BRIEF PROJECT DESCRIPTION: Passive/active vehicle barriers (center islands and ballistic guard booths) will be installed at Gregg Avenue Gate access control point (ACP).

START/END DATE (PROJECT DURATION): 2025 to 2026

REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION (complete a. or b.):

k. Analysis completed using Capacity Analysis Report. Analysis documentation and Capacity Analysis Report uploaded to http://aec.army.mil/Services/Support/NEPA.aspx on _____. It will be consolidated into the 2025 Enhanced Sustainability Annual Report, which will also available on the aforementioned website.

l. **Project is categorically excluded (CX) under the provisions of 32 CFR Part 651 Appendix B, Section II *List of CXs*, (c)(1), with no extraordinary circumstances: "Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required)." Justification for use of CX is as follows: The estimated area to be disturbed is less than one acre.**

**Note: A Section 106 consultation was completed based on the 95% Design plans on May 27, 2025. If plans change, a new consultation will need to be completed.**

Signature James Alan Mills _____ Date: 3/4/26 _____

Chief, DPW Environmental Division

# Appendix B-2

## Appendix B-2 - Recreational Vehicle Park

### Purpose and Need for Action

A new RV Park with necessary support elements is required to offer more adequate facilities for transient/TDY military personnel, individuals attending schools at Fort Lee, reservists and their families at the installation for annual training, vacationing personnel (to include active duty and retired military), and any other authorized patrons who may wish to engage in camping activities. The RV Park is anticipated to support 30,000+ TDY students per year and authorized Military and Civilian eastern seaboard travelers on Interstate 95 and 295. (See attached figure Appendix C).

If this project is not provided, the installation will not be able to offer/provide soldiers, family members, retirees, reservists, or other authorized patrons and adequate, efficient or conducive atmosphere for camping activities. There are very few facilities for camping in the Fort Lee geographic area.

### Description of Proposed Action and Alternatives for RV Park

The proposed action is to construct a 50-site RV Park adjacent to the Commissary and PX Community Support Area. The project includes construction of 50 back-in (12'x50') recreational vehicle sites with electrical hook-up (30 and 50 amp). RV sites will be located such as not to disturb archeological sites in the area.

### 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.

### Resource Areas Eliminated From Detailed Analysis

The following resource areas have been eliminated from detailed analysis due to the unlikelihood they be impacted by the proposed action. Those being removed from further analysis include airspace, government services, hazardous, toxic and radioactive substances, infrastructure, traffic/transportation and wetlands (no wetlands are indicated via National Wetlands Inventory Wetlands Mapper accessed June 3, 2025). Groundwater and stormwater as Water Resources are also eliminated, but surface water is discussed in the analysis.

## Table B-2 – Environmental Consequences Analysis – Recreational Vehicle Park

| Air Quality |
| --- |
| **Environmental Consequence Analysis – Proposed Action:** Soil disturbance may potentially create minor, temporary and localized air quality impact due to dust generation. Dust suppression will be necessary to mitigate potentially moderate, temporary impact in the vicinity of the projects. If generators will be used, they must be added to the Fort Lee air permit prior to purchase/lease/use. It is unlikely that NAAQS would be impacted or that the project would create a scenario where non-attainment would be achieved.<br><br>**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to air quality. |

| Cultural Resources |
| --- |
| **Environmental Consequence Analysis – Proposed Action:** The proposed action has the opportunity for impact to cultural resources as it will include subsurface disturbance. Each of the projects listed are subject to Section 106 consultation requirement independent of NEPA analysis.<br><br>**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to cultural resources. |

| Land Use |
| --- |
| **Environmental Consequence Analysis – Proposed Action:** The RV Park site is directly adjacent to an active helipad which is used to transport arriving dignitaries and VIP guests. The entrance to the RV Park will be less than 50 yards from the landing pad. This is a unique situation not fully described in the Capacity Analysis Report, therefore it is being described here for full analysis. Rotor wash, defined as the downward flow of air created by a helicopter's rotor blades as they generate lift, has the potential to create a strong wind effect as the downward airflow spreads outwards and downwards up to three times the helicopter's rotor diameter. For example, the Sikorsky UH-60 Black Hawk helicopter's main rotor diameter is 53 feet and 8 inches (17.9 yards). Rotor wash from that helicopter has the potential to affect people and objects within a 161 feet diameter (53.6 yards), which is slightly greater than the previously noted 50-yard distance from the landing pad to the RV Park entrance. The effects of the rotor wash at the outer edge of the diameter are not as great as the effect closer to the helicopter.<br><br>Given the low use frequency, the small amount of time the helicopter is operational when it is |

using the helipad, and the distance from the RV Park being on the outer edge of the rotor wash diameter, rotor wash impact from helicopter use would be minor and localized. Granted, the helipad operation is already established. The proposed action of locating the RV Park near the helipad will not change the current rotor wash impact from the helipad. Rather, the proposed RV Park location will subject RV Park users to the potential for rotor wash impact.

**Environmental Consequence Analysis– No Action:** RV Park users will not be subjected to potential helipad rotor wash.

## Noise

**Environmental Consequence Analysis – Proposed Action:** Construction activity is inherently noisy, and mitigation will be required to lessen the risk of impact. Best management practices to mitigate potential moderate, temporary noise impacts include:

- Construction would predominately occur during normal weekday business hours in areas adjacent to noise-sensitive land uses such as residential areas, recreational areas, and any off-post areas.
- Construction equipment mufflers would be properly maintained and in good working order.
- Residents adjacent to construction areas would be notified of the duration of construction activity before beginning work.

The RV Park has been cited adjacent to an active helipad. RV Park users will be subject to helicopter noise during landing and take-off. The helicopter pad is used infrequently for the transportation of Army dignitaries and VIPs. The estimate is that the helicopter pad will be used once per month or less. The helipad operation is already established and the noise from that operation will not change. The proposed action location will subject RV Park users to the helicopter noise. Given the low use frequency, and the small amount of time the helicopter is operational when it is using the helipad, noise from helicopter use would be minor and localized.

**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no construction noise impact and RV Park users will not be subjected to helipad activity noise.

## Soil Erosion

**Environmental Consequence Analysis – Proposed Action:** Earth-moving activities will require best management practices (BMPs) to mitigate soil erosion (silt fencing, avoiding stormwater pattern changes and compaction, etc). It is essential that project managers obtain Virginia Erosion and Stormwater Management Program (VESMP) permits and meet its requirements to avoid temporary, moderate impact.

The area will be heavily populated with human living activity – therefore there is the potential people drawn to the water body may damage the stream bank, causing long-term, moderate erosion impact. Mitigation activities such as signage reminding people to be mindful of the stream and its bank may help lesson impact.

**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to soil erosion.

## Surface Water

**Environmental Consequence Analysis – Proposed Action:** Earth-moving activities will require BMPs to mitigate soil erosion (silt fencing, avoiding stormwater pattern changes and compaction, etc) that could ultimately impact surface water. It is essential that project managers obtain VESMP permits and meet its requirements to avoid temporary, moderate impact (also indicated in the Soil Erosion analysis above).

The area will be heavily populated with human living activity – therefore there is the potential for more litter in this area than is normally found on-post. Litter could make its way into the drainage corridor that supports a small perennial stream, thus creating a long-term, moderate impact to the stream. Mitigation activities such as signage reminding people to clean-up after themselves may help lesson impact.

**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to surface water.

## Threatened and Endangered Species

**Environmental Consequence Analysis – Proposed Action:** There are three species listed on the U.S. Fish and Wildlife's Information for Planning and Consultation (IPaC) report (Appendix C) for the 9.5-acre area proposed for the RV Lot: The Northern Long-eared Bat (endangered), the Tri-Colored Bat (proposed endangered) and the Monarch Butterfly (proposed threatened). There are no critical habitats within the project area description.

The Capacity Analysis Report, which sources Fort Lee-specific threatened and endangered species information from the Integrated Natural Resource Management Plan for FY2021 through FY2025, indicates that mitigation measures to ensure the conservation of potential bat roosting includes no timber harvesting from 1 April through 31 October each year (which also mitigates impact to migratory birds). This, along with a field evaluation from the Fort Lee EMD Natural Resource office to ensure no bats are roosting in trees scheduled to be removed, safeguards the likelihood of a take. With the mitigation measures in place, no impact would be anticipated.

**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to the listed endangered species or the two candidates.

# Appendix B-3

## Appendix B-3 - Cumulative Impacts of Seven Scheduled Projects

Fort Lee has scheduled a variety of construction projects over the next several years, all of which individually meet criteria for categorical exclusion based on currently available information. Fort Lee has chosen to perform due diligence, analyzing the projects from a cumulative impact perspective.

NEPA dictates that a relationship analysis 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.

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.

The project list includes the most imminent projects. The majority of the listed projects represent construction in currently developed areas as well as meeting criteria for CATEX. The following resource areas have been removed from analysis due to the unlikelihood of any impact: airspace, government services, hazardous, toxic and radioactive substances, infrastructure, land use, threatened and endangered species, traffic/transportation and water resources.

| **Project** | **Anticipated Start Date** | **Project** | **Anticipated Start Date** |
|---|---|---|---|
| Sisisky Gate Active Vehicle Barriers | 2023 | Aerial Delivery and Field Services Department (ADFSD) Training Facility | 2026 |
| Confidence Obstacle Course /TA-27 | 2024 | FIRE & RESCUE TRAINING FACILITY (GAR) | 2029 |
| AVB/PVB Project at Gregg Ave Gate | 2025 | TA-26 Turn Pad project | To be determined |
| RV TRAVEL CAMPGROUND (50 SITES) | 2025 | | |

## Table B-2 – Environmental Consequences Analysis – Cumulative Effects

| Air Quality |
| --- |
| **Environmental Consequence Analysis – Proposed Action:** The projects scheduled to begin in 2025 through 2029 represent actions that will likely contribute to soil disturbance and dust generation. Dust suppression will be necessary to mitigate potentially moderate, temporary impact in the vicinity of the projects. If generators will be used, they must be added to the Fort Lee air permit prior to purchase/lease/use. Only two of the projects may be ongoing at this same time in 2025. There is approximately .7 miles distance between them, therefore it is unlikely nuisance dust will cumulatively create a scenario where non-attainment of the NAAQS thresholds is achieved, generators exceed emission limits of the Stationary Source Permit, or exceedance of the General Conformity Rule, goals of EO 13834 cannot be met or the general conformity rule thresholds are exceeded.<br><br>**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to air quality. |

| Cultural Resources |
| --- |
| **Environmental Consequence Analysis – Proposed Action:** Each of the proposed actions each have the opportunity for impact to cultural resources given most of them will include subsurface disturbance. Each of the projects listed are subject to Section 106 consultation requirement independent of NEPA analysis.<br><br>**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to cultural resources. |

| Noise |
| --- |
| **Environmental Consequence Analysis – Proposed Action:** Construction activity is inherently noisy, and mitigation will be required to lessen the risk of impact. Best management practices to mitigate potential moderate, temporary noise impacts for projects with temporal and special proximity include:<br><br>▪ Construction would predominately occur during normal weekday business hours in areas adjacent to noise-sensitive land uses such as residential areas, recreational areas, and any off-post areas.<br>▪ Construction equipment mufflers would be properly maintained and in good working order.<br>▪ Residents adjacent to construction areas would be notified of the duration of construction activity before beginning work. |

Location of the RV Park subjects park users up to monthly, temporary, minor and localized helicopter noise events from the adjacent helipad.

**Environmental Consequence Analysis– No Action:** There would be no noise impact.

### Soil Erosion

**Environmental Consequence Analysis – Proposed Action:** Earth-moving activities will require BMPs to mitigate soil erosion (silt fencing, avoiding stormwater pattern changes and compaction, etc). It is essential that project managers obtain VESMP permits and meet its requirements to avoid temporary, moderate impact during the period of construction on project with temporal and spatial proximity.

The RV Park will be heavily populated with human living activity – therefore there is the potential people drawn to the water body may damage the stream bank, causing long-term, moderate erosion impact. Mitigation activities such as signage reminding people to be mindful of the stream and its bank may help lesson impact.

**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to soil erosion.

### Surface Water

**Environmental Consequence Analysis – Proposed Action:** Earth-moving activities will require BMPs to mitigate soil erosion (silt fencing, avoiding stormwater pattern changes and compaction, etc) that could ultimately impact surface water. It is essential that project managers obtain VESMP permits and meet its requirements to avoid temporary, moderate impact due to projects with temporal and spatial proximity (also indicated in the Soil Erosion analysis above).

The area will be heavily populated with human living activity – therefore there is the potential for more litter in this area than is normally found on-post. Litter could make its way into the drainage corridor that supports a small perennial stream, thus creating a long-term, moderate impact to the stream. Mitigation activities such as signage reminding people to clean-up after themselves may help lesson impact.

**Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to surface water.

## Wetlands

**Environmental Consequence Analysis – Proposed Action:** If any of the projects sited near wetlands such that a significant impact may potentially be experienced, efforts must be made to minimize impact by adhering BMPs such as creating a 100-foot buffer zone, following soil erosion permit requirements and BMPs.

The Obstacle Course project (2024) and the Fire and Rescue Training Facility (2029) are each located in the vicinity of Cabin Creek, which has associated freshwater emergent and forested/shrub wetlands*. Both projects are/will be situated outside their respective 100-foot buffer zone, and are not anticipated to impact wetlands individually or cumulatively.

The ADFSD Training Facility (2029) has some adjacent riverine features, freshwater ponds and freshwater emergent and forested/shrub wetlands*. Given it is the only project currently planned for 2029 and otherwise meets the criteria for CATEX, it is not anticipated that this project will contribute to cumulative effects.

*Wetlands data derived from National Wetlands Inventory "Wetlands Mapper" accessed June 3, 2025

**Environmental Consequence Analysis– No Action:** Under the no action alternative, the construction would not be conducted and there would be no impact.

# Appendix C

## Appendix C - Information for Planning and Consultation (IPaC) Report (RV Park)

# United States Department of the Interior

FISH AND WILDLIFE SERVICE
Virginia Ecological Services Field Office
6669 Short Lane
Gloucester, VA 23061-4410
Phone: (804) 693-6694

In Reply Refer To:
Project Code: 2025-0128592
Project Name: Proposed RV Lot

07/29/2025 21:25:44 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). Any activity proposed on National Wildlife Refuge lands must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

**Migratory Birds**: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Project Code in the header of this

letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries

# OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Virginia Ecological Services Field Office**
6669 Short Lane
Gloucester, VA 23061-4410
(804) 693-6694

## PROJECT SUMMARY

Project Code: 2025-0128592
Project Name: Proposed RV Lot
Project Type: Recreation - New Construction
Project Description: Proposed 9.5 acre RV lot.
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@37.2546945,-77.32333336944832,14z


Counties: Prince George County, Virginia

## ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## MAMMALS

| NAME | STATUS |
|---|---|
| Northern Long-eared Bat *Myotis septentrionalis*<br>No critical habitat has been designated for this species.<br>Species profile: https://ecos.fws.gov/ecp/species/9045 | Endangered |
| Tricolored Bat *Perimyotis subflavus*<br>No critical habitat has been designated for this species.<br>Species profile: https://ecos.fws.gov/ecp/species/10515 | Proposed Endangered |

## INSECTS

| NAME | STATUS |
|---|---|
| Monarch Butterfly *Danaus plexippus*<br>There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat.<br>Species profile: https://ecos.fws.gov/ecp/species/9743 | Proposed Threatened |

## CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

# USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

## IPAC USER CONTACT INFORMATION

Agency: ERG
Name: Katie Watson
Address: 7927 Camberley Drive
City: Powell
State: TN
Zip: 37849
Email katie_watson@comcast.net
Phone: 8653238201