Enhanced Sustainability

2019 Annual Report

Fort Lee

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Prepared By:

U.S. Army Fort Lee, Virginia

Contract No. W91QF5-14-P-0141

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December 2019

List of Acronyms

AR	Army Regulation
BMP	Best Management Practice
BRAC	Base Realignment and Closure
CBPA	Chesapeake Bay Preservation Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMD	Environmental Management Division
EO	Executive Order
EPA	Environmental Protection Agency
ITAM	Integrated Training Area Management
MI-EMS	Mission Integration-Environmental Management System
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NLEB	Northern Long-Eared Bat
NMP	Nutrient Management Plan
PCB	Polychlorinated Biphenyl
QTR	Qualification Training Range
RCMP	Range Complex Master Plan
REC	Record of Consideration
RPA	Resource Protection Area
SI	Site Investigation
SF	Square Foot
SOP	Standard Operating Procedures
TA4	Training Area 4
TMDL	Total Maximum Daily Load
TRADOC	Training Doctrine Command
TSF	Training Support Facility
VEC	Valued Environmental Component

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Introduction

Welcome to the 2019 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 serves as the analysis for actions that were proposed during 2019 and that are planned to be proposed within the next five years. It will be provided for public comment and be made readily available for public and regulatory viewing by upload to the Fort Lee public website: http://www.lee.army.mil/dpw/emd/documents.review.aspx .

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

32 CFR Part 651.19, where the Army defines a REC in its NEPA implementation regulations, states that a REC is a "signed statement submitted with project documentation that briefly documents that an Army action has received environmental review". RECs are required when a categorical exclusion applies and "for actions covered by existing or previous NEPA documentation." It also states that "a REC can reference such documents as real estate Environmental Baseline Studies (EBSs) and other documents, as long as they are readily available for review".

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

Installation History

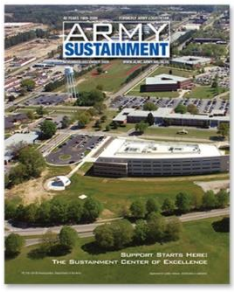
Camp Lee was activated in 1917 and served as a state mobilization and training center during World War I. Immediately after the war, Camp Lee was used for demobilization and deactivated at the end of 1919. After deactivation it became a wildlife preserve until 1940. It was reactivated in 1941 as a quartermaster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

training and petroleum training commenced.

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

established from the merger of combat development and training development.

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



Fort Lee Sustainability Program and Goals

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

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

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

Air Quality Management:
Reduce petroleum consumption 2% annually through 2020
Reduce Class II refrigerant usage and purchase; and

POL Management:
Reduce unintended releases.

Reduce Non-Hazardous Solid Waste/Hazardous Solid Waste:
Increase the diversion from landfill to recycling options by percentage from previous year.

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

NEPA History at Fort Lee

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

While the NEPA process has been followed at Fort Lee since its inception, its implementation became ever more prevalent during the 2005 BRAC activities which initiated tremendous installation growth that took place in a relatively short period of time. While BRAC EA and EISs were performed, Fort Lee was proactive with ensuring that awareness of sustainability and protectiveness did not end with the finalization of those documents. With an awareness that "all work is to be performed in a manner that prevents pollution, protects the environment, and conserves natural and cultural resources," a program to have the "best management practices" was born to integrate all of these various efforts. The Fort Lee environmental staff looked at their respective program requirements and all the various tasks and lessons learned in the field to create language that would be added to all the contracts for the various tenets, units, activities and environmental contracts. What began as a few paragraphs in post-wide contracts is now a multi-page and multi-media resource document which remains under constant review as new and current laws and regulations are added annually. The Fort Lee Environmental Special Conditions document has allowed EMD to cover and expand the growth and program needs to a wider community on Fort Lee.

NEPA Implementing Regulations

40 CFR 1500-1508

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

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

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

Public Involvement

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

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

Make diligent efforts to involve the public in preparing and implementing their NEPA procedures
Provide public notice of NEPA-related hearings, public meetings, and the availability of environmental documents so as to inform those persons and agencies who may be interested or affected
Hold or sponsor public hearings or public meetings whenever appropriate or in accordance with statutory requirements applicable to the agency;
Solicit appropriate information from the public
Explain in its procedures where interested persons can get information or status reports on EISs and other elements of the NEPA process
Make EISs, the comments received, and any underlying documents available to the public pursuant to the provisions of the Freedom of Information Act (5 United States Code 552), without regard to the exclusion for interagency memoranda where such memoranda transmit comments of Federal agencies on the environmental impact of the proposed action. Materials to be made available to the public shall be provided to the public without charge to the extent practicable, or at a fee which is not more than the actual costs of reproducing copies required to be sent to other Federal agencies, including the CEQ

There are additional CFR citations that pertain to public involvement requirements in NEPA, including: 40 CFR 1500.2: Policy, which encourages the facilitation of State public involvement in decisions which affect the quality of the human environment; and 40 CFR 1503.1: Inviting Comments, which is implemented after preparing a draft EIS and before preparing a final EIS. The agency shall *obtain* comments from jurisdictional Federal regulatory agencies and *request* comments from State and local regulatory agencies, applicable Indian tribes, agencies that have requested an EIS, the applicant (if any), and the public.

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

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

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

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

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

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

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

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

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

In addition, Fort Lee hosts a website that will be utilized when a project analysis and 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: http://www.lee.army.mil/dpw/emd/documents.review.aspx.

Valued Environmental Components

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

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

Significance

32 CFR Part 651.39 indicates that significance "is determined by examining both the context and intensity of the *proposed action* (40 CFR 1508.27). 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 context and intensity of the action; therefore, significance determinations will be unique to each proposed action.

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

Current Project Analysis Summary

Use of the new process allows for greater time and budget efficiency. It is quite simple to perform the analysis and determine if the context and intensity of the proposed action would result in a significant impact within the framework of the established baseline information and the criteria for determining significance. All required components of NEPA analysis is 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 2019. Full analysis information is presented in Appendix B.

Range Complex Master Plan Fiscal Year 2020 Update

The Proposed Action consists of the implementation of the RCMP which is intended to balance Fort Lee's training support mission with infrastructure and environmental considerations. The RCMP examined the range and training assets, requirements and utilization; analyzed environmental conditions; and developed a priority list and alternative solutions to help reduce or eliminate all identified range and training area deficiencies. Ultimately, the RCMP provides Fort Lee's decision makers with a single reference document to aid in the planning, programming, and management of all range and training assets.

Fort Lee Youth Sports Complex

There are currently 200 children on the MWR sports program waiting list. To accommodate the demand, Fort Lee proposes to build four, 360'x160', irrigated multi-purpose sports fields where instructional league soccer, rugby and football may be played. A support building (equipment storage, restrooms, office space, concession stand and utility room) will be constructed near the new fields.

Monitoring Results

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

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

References

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

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

Fort Lee, 2015. Environmental Planning Services Pilot Draft Capacity Analysis Report.

Fort Lee, 2015a. U.S. Army Corps of Engineers, Norfolk District and Baltimore District. Training Support Facility Design Analysis – 35%. August 4, 2015.

Fort Lee, 2014a. Fort Lee Environmental Special Conditions Standard Operating Procedures (SOP), April 1, 2014. Accessible at www.lee.army.mil/dpw/emd/documents/Environmental_Special_Conditions_01APR14.pdf.

Appendix A

NEPA Involvement Options Report

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

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

Table A-1 – Options

Inform	Consult	Involve	Collaborate
Agency Commitment: Provide parties with comprehensive, accurate and timely information about its NEPA decision-making.	Agency Commitment: 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: 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: 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: Provide sufficient objective information for parties to understand the issues being addressed through the NEPA process.	Agency Goal: Obtain feedback on issues in NEPA process, the alternatives considered, and the analysis of impacts.	Agency Goal: 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: 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: 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: 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: Grand Canyon National Park, Colorado River Management Plan: Scoping meetings held throughout country to shape	Case Example: 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: Scoping, draft and final review and comment period. Processes: Fact Sheets, Newsletter, Web Site, Open House, Panel Presentations, Public Meetings.	NEPA Phase: All phases. Processes: Notice and Comment, Surveys, Focus Groups, Consolation, Tribal, State, Public Meetings.	NEPA Phases: All Phases. Processes: Workshops, Deliberate Polling, Individual and/or group consultations, advisory committee.	NEPA Phases: All Phases. Processes: 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" 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. Best used when there is low concern/high trust relationship between the agency and the surrounding community.	Limited means for community to provide input. If high concern/low trust relationship exists between the agency and the surrounding community exists, this option could be negatively perceived.
"Consult" 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. 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" 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. 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" 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. 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. 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. There is a need for dedicated personnel to manage the collaboration activities. 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

Range Complex Management Plan Implementation Analysis

Purpose and Need for Action

The Range Complex Master Plan (RCMP) has undergone an update for the current fiscal year (2020). It establishes the range and maneuver land requirements needed at Fort Lee to support the installation training missions. The plan is designed to be a road map for the future development of the range complex to ensure that Fort Lee can meet its current and future training missions.

The installation staff will ensure that other staff planning documents support and are consistent with the Range Complex Master Plan.

Description of Proposed Action and Alternatives for RCMP

The Proposed Action consists of the implementation of the RCMP. The RCMP is intended to balance Fort Lee's operational and institutional training support mission with infrastructure and environmental considerations. The RCMP examines the range and training areas assets, training requirements and utilization and analyzed environmental conditions. The completed RCMP generates a Range Development Plan (RDP) or 1~N list of prioritized range modernization project requirements and alternative solutions to assist in reducing or eliminating identified range and training area deficiencies. Ultimately, the RCMP provides Fort Lee's decision makers with a single reference document to aid in the planning, programming, and management of all range and training assets.

The proposed action requires both maintenance of the status quo which includes continued maintenance at the Fort Lee training facilities and the continued reliance on off-site training land at a nearby installation. Two additional actions are listed but have been eliminated from further analysis since the installation has no plans to implement them: 1) modernize an existing range and 2) new construction.

Alternatives Considered

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

Under the No Action Alternative, the Army would not implement the 2020 RCMP and recommendations for meeting the range requirement shortfalls would not be put into operations.

Actions Eliminated From Detailed Analysis

Modernization of an existing range is included as one of the options to correct the shortfalls in ranges and training areas. It discusses the June 2013 completion of the Range 4 modernization into the new Qualification Training Range (QTR) which increases the range capabilities and support facilities. The QTR is a multipurpose range complex adding the capabilities of the M249 squad automatic weapon and the MK19 MOD-3 grenade machine gun. The conclusion is that the modernization of Range 4 resulted in the increase of range capabilities and support facilities; therefore, there are no current plans to modernize other ranges and this alternative has been eliminated from detailed analysis in this document.

New construction is also an alternative to support training needs. However, the 2020 RCMP does not identify any new construction projects and indicates that the option of new construction of training areas and ranges is limited at Fort Lee. Limited available construction space and the ability to construct new training facilities in a timely manner prohibits this as a current viable option when compared with the ease of training at another DoD installation. Therefore, this alternative has been eliminated from detailed analysis in this document.

VEC Analysis

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

Significance "is determined by examining both the context and intensity of the *proposed action*." For implementation of the 2020 RCMP, the context of the action being implemented for the continued safe use of existing ranges is appropriate. Intensity of the action is not considered to be significant, as there is no planned new construction or changes proposed; only maintenance of current facilities. Best management practices (such as those found in the Environmental Special Conditions SOP) to avoid or lessen the impact on the environment and surrounding community will be applied.

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

Table B-1 – Environmental Consequences Analysis

Air Quality
Environmental Consequence Analysis – Proposed Action: No adverse impacts to air quality would be expected from the Proposed Action. Continued use of training areas and ranges at current levels would not result in changes to the air quality of the area. Regional NAAQS pollutants are not anticipated to be affected; therefore, it is not anticipated that the General Conformity Rule will be exceeded, leading to a status of non-attainment. **Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to air quality.

Airspace

Environmental Consequence Analysis – Proposed Action:

Airspace is not anticipated to be affected. Airspace at Fort Lee is currently unrestricted, and the proposed action will not create an environment whereas that status would be changed to a designation of Special Use Airspace. Fort Lee maintains a Small Arms Range Safety Area (SARSA) when the ranges are in a "HOT" status, which includes the vertical hazards from small arms ricochets. The scheduling section at Range Control notifies Richmond International Airport operations center by sending a copy of Fort Lee's Official Range Bulletin one week in advance of any scheduled live range. These best management practices further safeguard airspace from range activity.

Environmental Consequence Analysis– No Action:

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

Cultural Resources

Environmental Consequence Analysis – Proposed Action:

The Proposed Action would mostly result in no prehistoric or historic properties affected due to the continued use of training areas and ranges at status quo.

On 12 March 2018 a work order request was submitted by Fort Lee Integrated Training Area Management (ITAM) asking for a categorical exception to policy to remove the 100-foot WWI training trench earthwork protection buffer restrictions along with the approval of mitigation techniques such as site capping or other best management practices (BMPs) to support training in the Fort Lee maneuver corridors. This request generated additional support by the Fort Lee Garrison Commander who acquired funding to complete a supplemental evaluation of the WWI Training Trench Complex. The Fort Lee WWI Training Trench Complex Study was awarded on 26 September 2019 and will provide the following deliverables: (1) A technical report including photographic. geospatial, and verbally descriptive data on the entire earthwork complex; (2) A long-term management plan identifying the portion of earthwork complex that is to be protected, the requirements for its protection, the portion that will be released to training, and procedure for execution; (3) preparation of a Historic American Landscape Survey (HALS) report and public education component as mitigation for the adverse effect of reducing the size of the earthwork training complex. Project completion is slated for 25 September 2020 with an additional month required for SHPO consultation to be conducted.

Once the SHPO has completed their review, training in areas where the 100 ft buffer has been removed

from the WWI trench areas will become less restrictive.

Training activities and range use under the Proposed Action would avoid any known archaeological sites. In order to avoid unintentional disturbance of known sites, 100-foot buffers have been designated and are appropriately enforced to ensure the areas are not disturbed. The risk of sub-surface disturbance to artifacts associated with the training activities is minimal. Any future activities that could impact cultural resources would be coordinated with the SHPO as appropriate under Section 106 of the National Historic Preservation Act.

Environmental Consequence Analysis– No Action:

Under the no action alternative, no impact to cultural resources is anticipated. Range activities and avoidance of known cultural resources would continue as normal, the same as with the Proposed Action.

Government Services

Environmental Consequence Analysis – Proposed Action:

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

Environmental Consequence Analysis– No Action:

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

Hazardous, Toxic and Radioactive Substances

Environmental Consequence Analysis – Proposed Action:

There would be no significant impacts from hazardous, toxic or radioactive substances from implementation of the Proposed Action. The training areas and ranges contain no DERP sites. Lead is not considered a hazardous waste in accordance to the Military Munitions Rule. Fort Lee will continue to adhere to current local management plans. There would be no need to modify or update any existing plans or procedures as a result of implementing the Proposed Action.

Environmental Consequence Analysis– No Action:

Under the No Action Alternative, there would be no significant impacts associated with hazardous, toxic, or radioactive substances. Current practices and mitigating procedures diminish risk of impact associated with hazardous, toxic or radioactive substances.

Infrastructure

Environmental Consequence Analysis – Proposed Action:

There is no concern of significantly impacting any of the privatized utilities (potable water, sewer, electricity and natural gas). Maintenance of the existing range facilities will not increase demand on infrastructure.

Environmental Consequence Analysis– No Action:

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

Land Use

Environmental Consequence Analysis – Proposed Action:

There is no concern of significantly impacting land use. There is no change in land use associated with the proposed action.

Environmental Consequence Analysis– No Action:

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

Noise

Environmental Consequence Analysis – Proposed Action:

No significant noise impacts are anticipated by implementing the Proposed Action. The RCMP addresses the fact that noise is inherent to range activities with the following: "As specified in AR 200-1, noise monitoring is required when noise Zone III extends off the installation, when there is significant noise controversy, or the installation receives significant complaints involving noise generated through training activities." Further, "Since the scope of noise-producing operations at Fort Lee is relatively small in scale, the effect on the surrounding community has not been great enough to pose a threat to mission sustainment".

Appropriate monitoring is conducted, and minimal range activities are practiced when atmospheric conditions are conducive to noise level increase.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact from noise.

Socioeconomics

Environmental Consequence Analysis – Proposed Action:

Maintenance of existing training facilities will not impact socioeconomic area of influence, economics, demographics or housing.

Environmental Consequence Analysis– No Action:

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

Soil Erosion

Environmental Consequence Analysis – Proposed Action:

Minor, short-term effects are anticipated. One of the stated RCMP training assumptions is that "continuous use of Fort Lee local training areas (TAs) (particularly TA 27/27A) will likely result in soil compression and increase erosion damage". Mitigation and repair through the Integrated Training Area Management (ITAM) Program would require these TAs be temporary closed for grading, reseeding and erosion control restoration. Therefore, no significant impact is anticipated.

Environmental Consequence Analysis– No Action:

Under the no action alternative, training activities would result in compression and erosion damage similar to the proposed action, but restoration of the site would be performed through the ITAM Program. No significant impact is anticipated.

Threatened and Endangered Species

Environmental Consequence Analysis – Proposed Action:

No significant impact is anticipated to threatened and endangered species. Fort Lee is working under the assumption that the federally-listed threatened Northern Long-Eared Bat (NLEB) may be present given it has been identified at the adjacent Petersburg National Battlefield. Any tree clearing to be performed for range maintenance will be reviewed to ensure protectiveness of the NLEB as indicated by the criteria for determining significance in the Capacity Analysis Report.

Environmental Consequence Analysis– No Action:

Under the no action alternative, the potential for impact is the same as the proposed plan and no significant impact is anticipated.

Traffic and Transportation

Environmental Consequence Analysis – Proposed Action:

Traffic and transportation systems will not be affected by continuing to maintain current range facilities.

Environmental Consequence Analysis– No Action:

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

Water Resources

Environmental Consequence Analysis – Proposed Action:

Groundwater, Stormwater and Surface Water: The Proposed Action would result in no water resource affect due to the continued use of training areas and ranges at status quo. No construction or other alterations to the landscape are planned therefore groundwater resources would remain in their current state. Fort Lee will continue to adhere to current BMPs and utilize preventive and mitigation measures already in place to alleviate the potential for impacts to water resources

Environmental Consequence Analysis– No Action:

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

Wetlands

Environmental Consequence Analysis – Proposed Action:

The presence of 414.89 acres of wetlands within Fort Lee's training areas presents a challenge for training exercises, but mostly there are no foreseeable adverse impacts to wetlands from the Proposed Action. Current mitigating practices include those set forth by the Chesapeake Bay Preservation Act (CBPA). No construction or other alterations to the landscape are planned therefore wetlands would remain in their current state.

Environmental Consequence Analysis– No Action:

Under the no action alternative, the same CBPA protections would be in place and no impacts are anticipated.

Cumulative Impacts

The CEQ regulations stipulate that the cumulative effects analysis within an EA should consider the potential environmental effects resulting from "the incremental effects of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other action" (40 CFR 1508.7). Recent CEQ guidance in *Considering Cumulative Impacts* affirms this requirement, stating that the first steps in assessing cumulative effects involve defining the scope of the other actions and their interrelationship with the Proposed Action. The scope must consider geographic and temporal overlaps among the Proposed Action and other actions. It must also evaluate the nature of interactions among these actions. Cumulative effects are most likely to arise when a relationship or synergism exists between a Proposed Action and other actions expected to occur in a similar location or during a similar time period. Actions overlapping with, or in close proximity to, the Proposed Action would be expected to have more potential for a relationship than actions that may be geographically separated. Similarly, actions that coincide, even partially, in time would tend to offer a higher potential for cumulative effects. To identify cumulative effects, this EA addresses three questions:

Does a relationship exist such that elements of the Proposed Action might interact with elements of past, present, and reasonably foreseeable future actions?

If one or more of the elements of the Proposed Action and another action could be expected to interact, would the Proposed Action affect or be affected by the effects of the other action?

If such a relationship exists, does an assessment reveal any potentially significant effects not identified when the Proposed Action is considered alone?

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 cumulative analysis. This approach enables decision makers to have the most current information available so that they can evaluate the environmental consequences of the Proposed Action and the No Action Alternative.

There are two projects at Fort Lee which have a temporal intersection with the Proposed Action. These are the implementation of the Wildland Fire Management and the Nutrient Management Plans, and construction of the Youth Sports Complex.

The Proposed Action would result in the effects identified in Table B-1. The effects of the Proposed Action would be maintained at

acceptable levels with the continued implementation of identified BMPs and mitigation measures.

The level of impacts, both direct and indirect, from activities under the Proposed Action would not contribute to cumulative effects for all but four of the VECs when combined with other proposed actions that may intersect with the implementation of the 2017 RCMP. The VECs that would not be impacted are: airspace, cultural resources, government services, hazardous/toxic/radioactive substances, infrastructure, land use, socioeconomics, traffic and transportation, threatened and endangered species, groundwater, stormwater, and wetlands.

Air Quality

Cumulative impacts to air resources as a result of the Proposed Action when combined with other present or reasonably foreseeable future actions, include a temporary increase in dust emissions as a result of construction activities. Implementation of the Wildland Fire Management Plan may also result in smoky conditions, but would be mitigated using techniques from the Smoke Management Plan if that occurred. Implementing mitigation measures and BMPs would effectively reduce the potential effects from these actions to a level of insignificance.

Present or future construction activities and prescribed fires would cause emissions of particulate matter and other pollutants at Fort Lee. Although emissions from each project individually would be temporary, the cumulative emissions from all projects would have a long-term, adverse, but insignificant impact on air quality in the area.

Noise

Noise levels from the Proposed Action would remain static. However, when combined with the additional noise from present or future construction projects, the Proposed Action would contribute to the collective increase in the noise environment. Changes to the noise environment would be short-term and minor with negligible long-term cumulative effects.

Soil Erosion

The implementation of the Proposed Action and other present or reasonably foreseeable future actions in the project area would have minor, short-term, and long-term direct impacts on soils. However, the use of site-specific erosion control measures and BMPs during and immediately after earth-disturbing activities of the present or reasonably foreseeable future actions would reduce the potential temporary erosion and sedimentation effects to a level that is not significant.

Surface Water

Cumulative impacts to water resources as a result of the Proposed Action, along with other reasonably foreseeable future actions, include potential overland transport of contaminants via stormwater runoff. Soil erosion, turbidity, and sedimentation, which may result in decreases in water quality are inherent with the construction projects. Most stormwater on Fort Lee's cantonment area is collected through a system of natural and man-made channels and piped storm sewers that convey the water to Bailey Creek. Bailey Creek already exhibits TMDL exceedances (pesticides, PCBs, dissolved oxygen depletion), therefore any impact from the combined proposed actions, without mitigation, may potentially be significant. In

addition, Blackwater Swamp, which lies adjacent to the golf course, empties into the Blackwater River and off-post observance of an endangered fish in the Blackwater River increases the sensitivity of this water. It, too, exhibits TMDL exceedances of Escherichia coli (E. coli). However, implementing mitigation measures and best management practices will effectively reduce the potential effects from these actions so that the effects would not be significant.

Appendix B

Youth Multi-Purpose Sports Field

Purpose and Need for Action

There are currently 200 Fort Lee youth on a waiting list for the youth sports program. The additional multi-purpose sports fields will help accommodate the demand for instructional league soccer, rugby and football facilities.

Description of Proposed Action and Alternatives for Youth Sports Complex

The Proposed Action consists of construction of four, irrigated, 360' x 160' fields to support youth instructional league soccer, rugby, and football games. Each field will be covered with 57,600 SF of irrigated natural turf and illuminated with 6 pole-mounted lighting fixtures that can be controlled remotely. Each field will include a pair of soccer goal posts, four 8' long aluminum team benches, an electronic score keeping board, one water fountain with a hose bib per field, and spectator seating (one 3-5 tier 33' long portable bleacher per field).

The support building is anticipated to be a 4,096 SF structure, centrally located near the proposed new multi-purpose fields. The building will accommodate a concessions area with storage (approx. 699 SF), maintenance shop (approx. 727 SF), equipment storage and check-out room (approx. 635 SF), restrooms (approx. 477 SF), two offices that include workstation areas and storage (approx. 1,261 SF), vestibule (approx. BO SF), and utility room (approx. 217 SF). In addition to the 4,096 SF building footprint, the structure will also include a 1,050 SF covered walkway. A connection to the emergency management, mass notification, information systems, and Energy Management Control System will be incorporated (includes fire protection and alarm systems).

Attractive natural landscaping will be incorporated throughout the site, using native species that look well-maintained during the non-growing season. Demolition is not required for the proposed multi-purpose fields and support building; however, the existing pine trees must be harvested prior to commencement of construction. The garrison will also surrender for timber harvesting the property defined on 3 sides by the 3.6-acre plot, 37th Street, & B Avenue.

This project will integrate sustainable design strategies and features to minimize energy consumption in the construction and operation of the new facility. Strategies include conservation of resources, minimization of adverse effects on the environment and improvement of occupants' productivity, health, and comfort. Ensure compliance with UFC 1- 200-02 and Memorandum, ASA (IEE)-SDD, Policy Update (16- DEC-2013).

The proposed site is the location of former WWII era barracks. Monitoring wells were installed and a stand of pine trees were planted after the demolition of the barracks and removal of underground fuel oil storage tanks. After the demolition project, this area was included on the installation's restoration plan. During the site visit the DPW reported that this land has now been removed from the restoration plan and that no hazardous condition is evident.

No Action Alternative

Currently there are not enough sports facilities to meet demand. If this project is not provided, the youth sports program will continue to experience this issue.

Analysis

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

As was explained in section 7.0, significance "is determined by examining both the context and intensity of the *proposed action*." For the Youth Sports Complex construction, the context of the action being built in a less-populated area and near other recreational opportunities (it is near the Cardinal Golf Course) is appropriate. Intensity of the construction is not considered to be significant, as construction of new facilities is common at Fort Lee and best management practices (such as those found in the Environmental Special Conditions SOP) to avoid or lessen the impact on the environment and surrounding community will be applied. The temporary nature of the construction activities will not cause significant long-term effects.

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

Table B-2 – Environmental Consequences Analysis

Air Quality
Environmental Consequence Analysis – Proposed Action: Regional NAAQS pollutants are not anticipated to be affected; therefore there it is not anticipated that the General Conformity Rule will be exceeded, leading to a status of non-attainment. Short-term, minor adverse effects may be experienced with the increase in particulate matter due to use of earth-moving construction equipment. Emissions from stationary equipment is not anticipated to produce emissions that would exceed the pollutant limits in the Stationary Source Permit to Operate (Permit #50564). The action is not anticipated to create an environment whereas Fort Lee would be unable to meet the goals set forth in Executive Orders 13423 and 13514. **Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to air quality.

Airspace
Environmental Consequence Analysis – Proposed Action: Airspace is not anticipated to be affected. Airspace at Fort Lee is currently unrestricted and the proposed action will not create an environment whereas that status would be changed to a designation of Special Use Airspace. **Environmental Consequence Analysis– No Action:** Under the no action alternative, there would be no impact to airspace.

Cultural Resources

Environmental Consequence Analysis – Proposed Action:

Cultural resources are not anticipated to be affected. Significance criteria includes the review of all proposed actions by the Cultural Resource Manager and adherence to the requirements presented in the Integrated Cultural Resource Management Plan SOPs.

Environmental Consequence Analysis– No Action:

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

Government Services

Environmental Consequence Analysis – Proposed Action:

Government Services are not anticipated to be affected by the proposed plan. The construction of the Youth Sports Complex will not result in an increase of personnel whereas government services would be strained to provide support

Environmental Consequence Analysis– No Action:

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

Hazardous, Toxic and Radioactive Substances

Environmental Consequence Analysis – Proposed Action:

No adverse effect is anticipated. Construction activities are not anticipated to generate a new waste stream that cannot be immediately or safely managed under existing protocols. The generation of excessive quantity of waste that cannot be adequately or safely managed under the current applicable SOP is not expected to occur.

The site is located on land that underwent a Site Investigation (SI) to determine if a release to the environment had occurred. The full results of that SI may be found in the October 2009 Final Site Investigation Report for the 10,000 Barracks site. The conclusion was that no release of hazardous substances was found after a comprehensive investigation of surface soil, subsurface soil, and groundwater. The site received a no further action status from the Virginia Department of Environmental Quality upon finalization of the SI.

It is possible that construction of the youth sports complex may encounter waste that was identified during the SI. A geophysical study to identify subsurface anomalies was conducted as part of the SI.

Hazardous, Toxic and Radioactive Substances

Once anomalies were identified, intrusive sampling was performed in test pits associated with the subsurface items. Construction debris was identified in the test pits. Samples were collected and analyzed for hazardous material, including lead and asbestos, and nothing was found. The SI also concluded that the subsurface material did not constitute a "landfilling" situation as it was not widespread.

Environmental Consequence Analysis– No Action:

No adverse effect is anticipated. Under the no action alternative, the construction would not be conducted and therefore no waste stream generated.

Infrastructure

Environmental Consequence Analysis – Proposed Action:

There is no concern of significantly impacting any of the privatized utilities (potable water, sewer, electricity and natural gas). Construction of the fields and support building will not create an excessive demand for these products.

The construction contractor will be subject to the Environmental Special Conditions SOP, which addresses the contractor's responsibility to plan for and execute proper disposal of construction debris whereas there will be no risk of the ability to meet the Army's measure of merit goals for solid waste C&D diversion

Environmental Consequence Analysis– No Action:

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

Land Use

Environmental Consequence Analysis – Proposed Action:

There is no concern of significantly impacting land use. While there is an established office building adjacent to the proposed sports complex, it is in a generally less populated area. The fields and support building are being built in an area of other recreation use (i.e. the golf course).

Short-term minor effects from construction noise may occur (see Noise VEC).

Environmental Consequence Analysis– No Action:

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

Noise

Environmental Consequence Analysis – Proposed Action:

Short-term minor effects from construction-related noise is to be expected. The construction site is located in Noise Zone 1, where decibel level should not exceed 87. Individual pieces of outdoor construction may only exceed that number slightly, but it is anticipated that several may be run concurrently, increasing the decibel levels during peak work hours. Application of BMPs will mitigate noise impact.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact from noise.

Socioeconomics

Environmental Consequence Analysis – Proposed Action:

Potential short-term, beneficial impact may be experienced by local townspeople if they are able to gain construction employment. No adverse impact is anticipated.

Environmental Consequence Analysis– No Action:

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

Soil Erosion

Environmental Consequence Analysis – Proposed Action:

Short-term, minor, adverse effects are anticipated. Erosion and potential stormwater runoff is inevitable during construction activities. The contractor will be producing erosion and stormwater control plans and are subject to the Environmental Special Conditions SOP which specifies mitigation activities and BMPs.

Environmental Consequence Analysis– No Action:

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

Threatened and Endangered Species

Environmental Consequence Analysis – Proposed Action:

No impact is anticipated to threatened and endangered species. The Northern Long-eared Bat (NLEB) is threatened and is assumed to be present on-post after acoustic monitoring during a 2016 multi-week bat survey detected call characteristics consistent with the species.

Timber removal greater than one acre for any one project within the NLEB activity season of April 1 through November 15 and ten acres outside of the activity season (November 15 through March 31) must be avoided. In order to avoid the potential of destroying NLEB habitat (which would be considered a significant impact), timber removal will meet this schedule criteria.

Environmental Consequence Analysis– No Action:

Under the no action alternative, there would be no impact to threatened and endangered species.

Traffic and Transportation

Environmental Consequence Analysis – Proposed Action:

Short-term, minor impact may occur. Road closure will not be necessary, but the use of on-road construction vehicles would result in increased vehicle traffic during the periods of construction. It is not anticipated that local traffic will be increased by more than five percent.

Environmental Consequence Analysis– No Action:

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

Water Resources

Environmental Consequence Analysis – Proposed Action:

There are no surface water bodies in the immediate area of the proposed action and groundwater will not to be impacted.

Environmental Consequence Analysis– No Action:

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

Wetlands

Environmental Consequence Analysis – Proposed Action:

Wetlands are present in the northwest portion of the site, however, there are no activities that would create a significant impact (i.e. there will be no wetland loss, destruction or introduction of invasive species.

Environmental Consequence Analysis– No Action:

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

Cumulative Impacts

The CEQ regulations stipulate that the cumulative effects analysis within an EA should consider the potential environmental effects resulting from "the incremental effects of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other action" (40 CFR 1508.7). Recent CEQ guidance in *Considering Cumulative Impacts* affirms this requirement, stating that the first steps in assessing cumulative effects involve defining the scope of the other actions and their interrelationship with the Proposed Action. The scope must consider geographic and temporal overlaps among the Proposed Action and other actions. It must also evaluate the nature of interactions among these actions. Cumulative effects are most likely to arise when a relationship or synergism exists between a Proposed Action and other actions expected to occur in a similar location or during a similar time period. Actions overlapping with, or in close proximity to, the Proposed Action would be expected to have more potential for a relationship than actions that may be geographically separated. Similarly, actions that coincide, even partially, in time would tend to offer a higher potential for cumulative effects. To identify cumulative effects, this EA addresses three questions:

Does a relationship exist such that elements of the Proposed Action might interact with elements of past, present, and reasonably foreseeable future actions?

If one or more of the elements of the Proposed Action and another action could be expected to interact, would the Proposed Action affect or be affected by the effects of the other action?

If such a relationship exists, does an assessment reveal any potentially significant effects not identified when the Proposed Action is considered alone?

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 cumulative analysis. This approach enables decision makers to have the most current information available so that they can evaluate the environmental consequences of the Proposed Action and the No Action Alternative.

There are two projects at Fort Lee which have a temporal intersection with the Proposed Action. These are the implementation of the Wildland Fire Management and Nutrient Management Plans, and implementation of the RCMP.

The Proposed Action would result in the effects identified in Table B-2. The effects of the Proposed Action would be maintained at acceptable levels with the continued implementation of identified BMPs and mitigation measures.

The level of impacts, both direct and indirect, from activities under the Proposed Action would not constitute cumulative effects on airspace, cultural resources, government services, hazardous/toxic/radioactive substances, infrastructure, land use, noise, socioeconomics, soil erosion, threatened and endangered species, groundwater, stormwater, and wetlands.

Air Quality

Cumulative impacts to air resources as a result of the Proposed Action when combined with other present or reasonably foreseeable future actions, include a temporary, minor increase in dust emissions as a result of construction activities and particulate matter due to wildland fires. Implementing mitigation measures and BMPs would effectively reduce the potential effects from these actions to a level of insignificance. It is not anticipated that NAAQS or the Stationary Permit emission limits would be exceeded.