



**Department of the Army**  
Joint Base Lewis-McChord, Washington

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## **ENVIRONMENTAL ASSESSMENT**

**Morale, Welfare and Recreation  
Flightline Recreational Vehicle Storage Facility  
Joint Base Lewis-McChord, Washington**

**January 2023**



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## LIST OF ACRONYMS and ABBREVIATIONS

AIRFA	American Indian Religious Freedom Act
APE	Area of Potential Effect
AQCR	Air Quality Control Region
AR	Army Regulation
BMP	best management practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dB	Decibel
DBH	Diameter at Breast Height
DoD	Department of Defense
DFMWR	Directorate of Family Morale, Welfare and Recreation
EA	Environmental Assessment
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FNSI	Finding of No Significant Impact
IDP	Installation Development Plan
INRMP	Integrated Natural Resources Management Plan
IPM	Integrated Pest Management
JBLM	Joint Base Lewis-McChord
MBTA	Migratory Bird Treaty Act
MS4	Municipal Separate Storm Sewer System
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NPDES	National Pollutant Discharge Elimination System
RV	Recreational Vehicle
SDWA	Safe Drinking Water Act
SHPO	State Historic Preservation Officer
SOP	Standard Operating Procedure
SPCCP	Spill Prevention Control and Countermeasures Plan
WAC	Washington Administrative Code
WHPA	Wellhead Protection Area

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## 1 INTRODUCTION

Joint Base Lewis-McChord (JBLM) is located in western Washington State and occupies portions of Pierce and Thurston Counties along the Interstate 5 corridor. JBLM is approximately 45 miles south of Seattle and 15 miles south-southwest of Tacoma. JBLM is the west coast's largest military installation covering a total area of 90,836 acres. JBLM, Directorate of Family Morale, Welfare and Recreation (DFMWR) is a network of support and leisure services designed to serve the needs, interests, and responsibilities of each individual in the JBLM community, as well as enhance the quality of their lives. Programs range from family, child and youth programs to recreation, sports, entertainment, travel and leisure activities. DFMWR helps ensure JBLM readiness by caring for the people who serve and stand ready to defend the nation. Outdoor recreation is a large component of the DFMWR programming. The outdoor recreation program includes travel camp and cabins; the Northwest Adventure Center; equipment rentals; Adventures Unlimited; the Russell Landing Marina; parks and pavilions; and recreational vehicle (RV) storage.

JBLM has seven storage lots with covered and uncovered storage spaces available to rent on a monthly basis for privately owned recreational vehicles. The outdoor storage facilities are all secured with locked gates and are accessible to registered customers 24 hours a day. Eligible vehicles include trailers, camper trailers, motor homes, RV vans, fifth wheels, pick-up campers, and boats. There are currently 1,113 total spaces available; 110 of those are covered the rest are uncovered. JBLM estimates 1,067 are currently occupied. The spaces available range in length from 15 feet to 45 feet. Monthly rates are based on the type of storage (covered, uncovered, or indoor) and length. The rates range from \$55 to \$115 per month.

Storage spaces are available to Department of Defense (DoD) cardholders only. Priority for storage space rentals is as follows with highest priority listed first:

- Active duty living on-base (must provide documentation from JBLM housing),
- Active duty living off-base,
- Retirees/reservists, and
- DoD civilians.

JBLM proposes to construct, operate, and maintain a new RV storage lot to accommodate the growing number of privately owned recreational vehicles (Figure 1-1). Recreational opportunities for Soldiers and their families have been programmatically assessed in the Final Environmental Impact Statement (EIS) for the Fort Lewis Army Growth and Force Structure Realignment, July 2010 (Army 2010) and the Final Programmatic EIS for the Realignment, Growth and Stationing of Army Aviation Assets, 2011 (Army 2011).

The Army is the lead Federal agency for compliance with the National Environmental Policy Act (NEPA) and is preparing an Environmental Assessment (EA) to meet the compliance requirements of the Council on Environmental Quality (CEQ) regulations implementing NEPA at 40 Code of Federal Regulations (CFR) Part 1500-1508 as well



as Army NEPA implementing regulations at 32 CFR 651. This EA incorporates the aforementioned EISs by reference.

### **1.1 Purpose of the Proposed Action**

DFMWR program is a quality-of-life program that directly supports readiness by providing a variety of community, soldier, and family support activities and services. Included are social, fitness, recreational, educational, and other activities that enhance community life, foster soldier and unit readiness, promote mental and physical fitness, and generally provide a working and living environment that attracts and retains quality Soldiers (Army Regulation [AR] 215-1, paragraph 1-9a). This includes providing leisure activities that support a quality of life commensurate with generally accepted American values, fostering pride in one's community, and easing the impacts of military life.

### **1.2 Need for the Proposed Action**

Currently, there is a waitlist for RV storage space containing approximately 180 eligible DoD cardholders. The nearest DoD installations that offer RV storage are well outside the target market region of approximately 20 miles. Off-base RV storage space costs more and involves extra travel time during pick-up and drop-off than on-post storage lots. Costs for off-base storage at facilities in Tacoma, Puyallup, Spanaway, and Yelm range from \$70 to \$175 per month depending on RV length (20 feet to 45 feet respectively). Additionally, Active-Duty households are not permitted to store recreational equipment/vehicles outside their homes on JBLM. Establishing an additional RV storage lot would allow for JBLM to continue to provide recreational facilities for Soldiers and their families.

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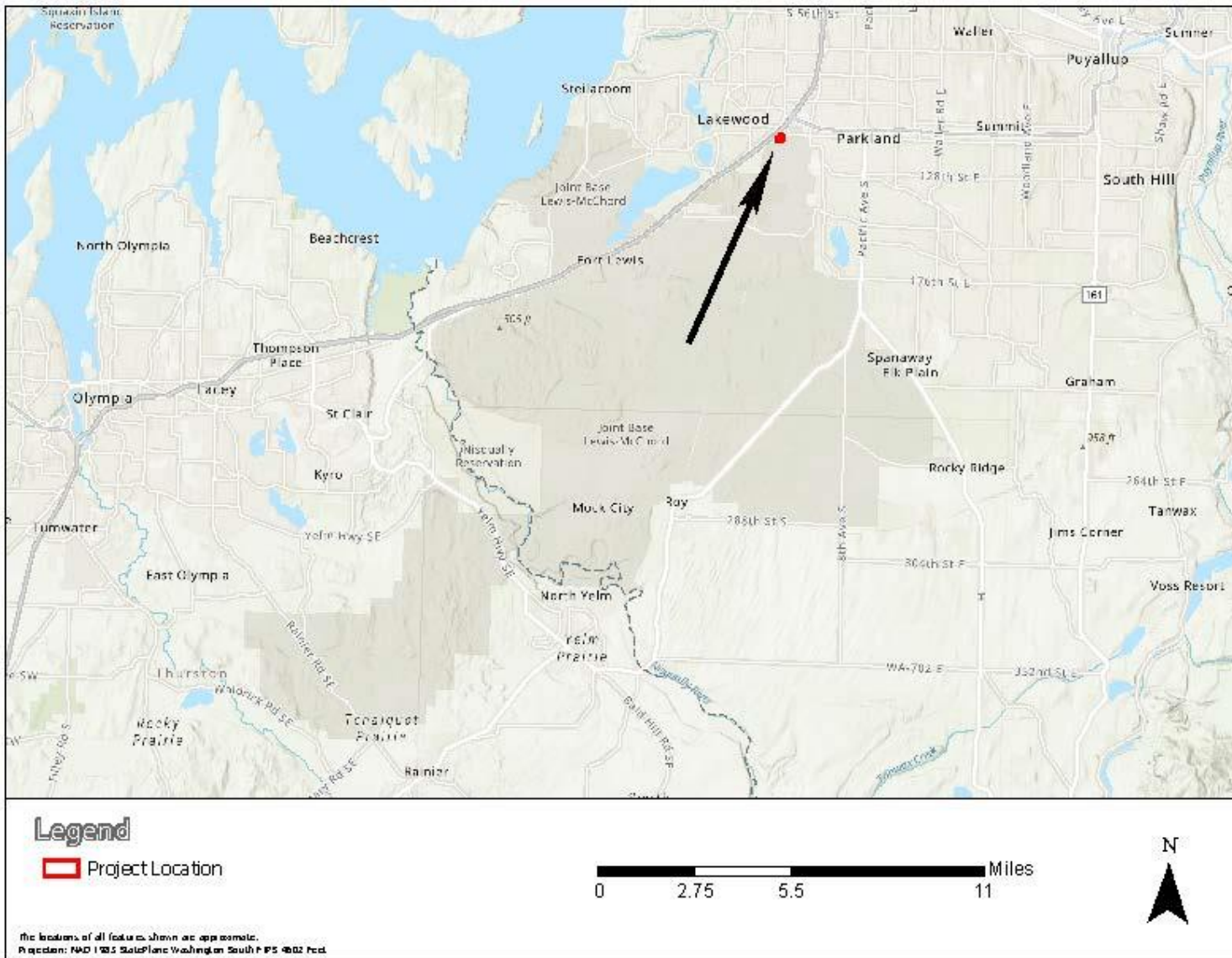


Figure 1-1. General location map of proposed RV storage lot.

### 1.3 Scope of Analysis

This EA analyzes the potential environmental effects of two alternatives: a No Action Alternative and one action alternative. The document will analyze direct effects (those caused by the action alternative and occurring at the same time and place) and indirect effects (those caused by the action alternative and occurring later in time or farther removed in distance, but that are still reasonably foreseeable). The potential for mitigation measures to avoid, minimize, rectify, reduce, or compensate for impacts will be identified, where appropriate.

### 1.4 Relationship to Statutes, Regulations, and Policies

The intent of the EA is to comply with NEPA by assessing the potential impacts of the proposed RV storage lot. Additional guidance for NEPA compliance and for assessing impacts is provided in the CEQ *Regulations for Implementing the Procedural Provisions of NEPA* (40 CFR Chapter V Parts 1500-1508), and *Environmental Effects of Army Actions* (32 CFR Part 651).

Army decisions that affect environmental resources and conditions also occur within the framework of numerous laws, regulations, and Executive Orders (EOs). Some of these authorities prescribe standards for compliance; others require specified planning and management actions, the use of which is designed to protect environmental values potentially affected by proposed training operations. Laws and related regulations bearing on the proposed Army actions include, but are not limited to, the Clean Air Act (CAA); Coastal Zone Management Act (CZMA); Endangered Species Act (ESA); Federal Water Pollution Control Act (also known as Clean Water Act [CWA]); Migratory Bird Treaty Act (MBTA); National Historic Preservation Act (NHPA); and Safe Drinking Water Act (SDWA).

EOs bearing on proposed Army actions include EO 11988 (*Protection of Floodplains*), EO 11990 (*Protection of Wetlands*), EO 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*), EO 14008 (*Tackling the Climate Crisis*), EO 13007 (*Sacred Indian Sites*), EO 13045 (*Protection of Children from Environmental Health Risks and Safety Risks*), and EO 13175 (*Consultation and Coordination with Indian Tribal Governments*).

Army actions are also governed by DoD, Army and JBLM regulations, including the following:

- AR 200-1 (*Environmental Quality – Environmental Protection and Enhancement*; December 13, 2007)
- JBLM Regulation 200-1 (*Environmental Protection and Enhancement*; November 1, 2004)
- AR 385-10 (*Army Safety Program*; February 24, 2017)
- Fort Lewis Regulation 350-30 (*Fort Lewis Range Regulations*; March 29, 2000; Change 1 November 23, 2005)

- Fort Lewis Regulation 420-5 (*Procedures for the Protection of State and Federally Listed Threatened, Endangered, Candidate Species, Species of Concern, and Designated Critical Habitat*; August 9, 2004)

### **1.5 Public Involvement**

The premise for NEPA is that providing information to the decision-maker and the public will improve the quality of final decisions concerning the environmental effects of federal actions. All persons who have a potential interest in the proposed action, including minority, low-income, and Native American groups, are urged to participate in the Army's environmental impact analysis process conducted under NEPA.

The EA is available for public review and comment for 30 days, from MON DD YYYY to MON DD YYYY. The Notice of Availability (NOA) of the EA has been mailed electronically and/or hard copy to known stakeholders and interested parties. The NOA has been publicized on the JBLM website and in the Tacoma News Tribune and The Olympian. The EA is available for download from the JBLM website ([https://home.army.mil/lewis-mcchord/index.php/my-Joint-Base-Lewis-Mcchord/all-services/public\\_works-environmental\\_division/environmental-impact-analysis](https://home.army.mil/lewis-mcchord/index.php/my-Joint-Base-Lewis-Mcchord/all-services/public_works-environmental_division/environmental-impact-analysis)).

The Army will review and respond to comments received during the public comment period. If new impacts are found, these will be analyzed accordingly.

### **1.6 Decisions to be Made**

Based on the findings of the EA, the Army decision-maker will decide whether to implement the proposed action or another alternative. If the decision-maker selects the proposed action and the EA determines that there would be no significant environmental impacts, a Finding of No Significant Impact (FNSI) would be signed.

## **2 PROPOSED ACTION AND ALTERNATIVES**

Alternatives considered under NEPA must include the proposed action alternative and the No Action alternative. The No Action alternative is included as a means of comparison to the action alternative to help distinguish the relative merits and disadvantages between alternatives. Pursuant to Army Regulation 32 CFR 651, *Environmental Analysis of Army Actions*, the selected alternative must meet the project purpose and need, and it should be environmentally acceptable, to the extent possible.

### **2.1 McChord Airfield Flightline RV Storage Facility Alternative**

The proposed site for the new RV storage lot is located west of the north end of McChord Airfield within the Flightline District (Figure 2-1). The lot would provide 440 spaces for RVs of varying lengths as shown in Table 2-1 below.

Table 2-2-1. Proposed space breakdown.

Space Type	Width (feet)	# of Spots	Percentage Breakdown
21-30 feet uncovered	12	98	22%
31-39 feet uncovered	12	211	48%
40 feet + uncovered	12	131	30%
<b>Total</b>		<b>440</b>	<b>100%</b>

The area proposed allows for a 100-foot protection area around the existing wellhead which would remain outside of the storage lot fencing. The existing road located on the site Command Circle would be extended to serve as the main entrance into the RV storage lot and to provide access to the existing wellhead. The majority of the interior roads within the storage lot are designed as one-way drive lanes to accommodate back-in angled parking. The perimeter of the site along the fence line would include larger two-way drive lanes to provide enough space for pull through parking and for fire access. The proposed design fully utilizes the east side of Command Circle to minimize the impacts on the Oregon white oak trees and to preserve them whenever possible. Oregon white oak trees are protected by the JBLM Installation Natural Resources Management Plan. The proposed site layout is intended to meet Best Management Practices (BMPs) to treat stormwater on-site. Site re-grading would be required, although the existing topography of the site is relatively flat. The natural drainage pattern of the site would be maintained, and the stormwater discharge would continue to flow to the west. The RV storage lot would not include any vehicle washing, living purposes, and the RVs would need to be in working condition in order to ensure proper maintenance of the RVs within the storage lot.

The RV storage lot would be designed with a 7-foot-tall black vinyl fencing around the perimeter with one main vehicular gate located at the southern entry of Command Circle. This would help ensure the safety and security of the vehicles parked in the storage lot. Due to the close proximity to the airfield, all roadway lighting would be dark sky compliant to minimize the light pollution. The design should not integrate any up lighting around the planting areas.

Construction of the 10-acre storage lot involves tree removal, site grading, and spreading gravel. All coniferous trees and any non-oak deciduous species would be removed. Oregon white oak trees would be maintained to the greatest extent possible. Any Oregon white oak trees that must be removed would be mitigated off-site. JBLM has a prescriptive 6:1 replanting ratio for Oregon white oak trees that are removed on the installation. Following vegetation removal, the site would be graded to create a compacted smooth surface for driving and parking. Gravel would be spread and compacted throughout the site. Using gravel instead of asphalt or concrete, allows groundwater infiltration to occur across the site. Structural elements include:

- Security fencing with privacy screens
- Automated entry system

- Area/perimeter security lighting, and transformer upgrades if required. Lighting would be light emitting diode (LED) and attached to wood utility poles with aerial feeders.

## **2.2 No Action Alternative**

Analysis of the No Action Alternative is required by the CEQ (40 CFR Chapter V Part 1500-1508) and Army NEPA-implementing regulations (32 CFR 651). The No Action Alternative serves as the baseline condition for analysis of other alternatives. Under the No Action Alternative, no additional RV storage lot would be established. The existing facilities would leave the RV storage needs of Soldiers and other DoD cardholders unmet. Therefore, the No Action Alternative does not meet the purpose and need for the proposed action.





Figure 2-1. Proposed RV storage lot location and approximate 10-acre footprint.

## **2.3 Alternatives Considered but Eliminated from Further Consideration**

### **2.3.1 Expand Existing RV Storage Facilities Alternative**

This alternative would expand any of the existing seven RV storage lots. It was determined that the cost of existing lot expansion did not validate the small number of increased spaces provided at any of the existing lots. There is no vacant land sufficient at any of the existing lots to accommodate even the 180 additional RVs currently on the waitlist. This alternative does not meet the purpose and need for the proposed action.

### **2.3.2 Lewis North RV Storage Facility Alternative**

A site was identified during the project validation process located on the northwest side of the installation near the Lewis North Athletic Complex. Existing structures were recently demolished and existing vegetation on the site is limited. Conversion of this site for RV storage would minimize vegetation removal and the ground surface has been previously disturbed. However, this site has been identified for future development within Lewis North for development within the Installation Development Plan (IDP) (JBLM 2014a) within the JBLM Real Property Master Plan. This site is unavailable for alternative development options and has been removed from further consideration.

## **2.4 Design Measures, Current Practices, and Best Management Practices**

Current physical, structural, or managerial practices are used to decrease the potential for impacts. Integrated into the proposed action are design features and measures that avoid environmental impacts. Where avoidance is not possible, the design has been modified to minimize those impacts.

### **2.4.1 Best Management Practices and Mitigation**

The Army proposes mitigation for adverse effects to the natural environment under the proposed action. Mitigation strategies generally include the following, which are presented in the preferred order for implementation, and were established in accordance with CEQ regulations:

- Avoid the impact altogether by stopping or modifying the proposed action.
- Minimize the impacts by limiting the degree of magnitude of the action and its implementation.
- Rectify the impact by repairing, rehabilitating, or restoring the affected environment.
- Reduce or eliminate the impact over time through use of preservation and maintenance operations during the life of the action.
- Compensate for the impact by replacing resources or providing substitute resources.

Mitigation proposed by the Army includes standard operating procedures (SOPs) and BMPs that minimize risks and potential impacts of Army actions. Many SOPs are incorporated into JBLM or Army regulations. Additional BMPs were identified during the course of developing the proposed action to help avoid or reduce anticipated potential effects to resources from the action. These BMPs are considered to be part of the



proposed action. Other mitigation may be identified during the course of preparing the EA. In some cases, mitigation must be implemented to reduce impacts to less-than-significant levels and is identified as such. To avoid confusion when discussing mitigation in Chapter 3, the term BMP will be used to refer to actions that the Army is already doing (including actions required by regulations), that were developed as part of the proposed action, or that were developed during the environmental assessment process.

Specific BMPs are discussed in Chapter 3 for each resource and summarized in Appendix A.

### 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section evaluates impacts to various resources by the different alternatives carried forward for evaluation. Table 3-1 identifies the resources evaluated for detailed analysis with a rationale for inclusion or exclusion. Resources are excluded from detailed analysis if they are not potentially affected by the alternatives or have no material bearing on the decision-making process.

Table 3-1. List of resources considered for detailed effects analysis and rationale for inclusion or exclusion.

<b>Resource</b>	<b>Included in Detailed Analysis (Y/N)</b>	<b>Rationale for inclusion or exclusion</b>
Land Use and Recreation	Y	The proposed site has been identified for development under the JBLM Real Property Master Plan IDP (JBLM 2014a, JBLM 2014b). Analysis is required as the proposed action defined thresholds covered under the Programmatic EA for the JBLM Real Property Master Plan (JBLM 2017). The proposed action would also benefit the overall DFMWR recreation program.
Hydrology and Water Quality	Y	The size of the site and proposed action require compliance with the JBLM National Pollutant Discharge Elimination System (NPDES) permit. Analysis is required to avoid and minimize effects from stormwater and also to groundwater which supplies the nearby well.
Topography and Soils	N	No long-term impacts to topography and soils are expected to occur as a result of the proposed action. The proposed action would require minor site grading. BMPs would ensure that soils are stabilized during and after construction.
Wetlands	N	A wetland reconnaissance was conducted at the project location. No wetlands were identified.

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<b>Resource</b>	<b>Included in Detailed Analysis (Y/N)</b>	<b>Rationale for inclusion or exclusion</b>
Vegetation	Y	Mature vegetation would be disturbed in order to clear the site for the proposed use. There are several Oregon white oak trees which may need to be removed. Analysis is required to avoid, minimize, and mitigate effects.
Wildlife	Y	Many different wildlife species may be present. Analysis is required to determine which wildlife species would be present, the intensity of effects, and how to avoid or minimize effects.
Fish	N	There are no surface waterbodies affected by the proposed action. No fish species would be impacted.
Threatened and Endangered Species	N	The proposed action would have no effect on protected species in the project area based on coordination with JBLM Fish and Wildlife staff and review of the U.S. Fish and Wildlife Service .
Invasive Species	N	This proposed action has very minor potential risk for introduction of invasive species. Standard measures to prevent the introduction of invasive species from outside sources on maintenance equipment would be used for construction, and introduction of invasive species is not anticipated.
Air Quality, Noise, and Greenhouse Gas Emissions	Y	The air-pollutant concentrations in the project area have consistently been below the National Ambient Air Quality Standards (NAAQS); however, an analysis of pollutants emissions from the proposed construction is necessary to disclose to the public. The proposed action has the potential to impact sensitive noise receptors during construction, including humans and wildlife. Analysis is required to determine the intensity of effects. Noise impacts to wildlife would be evaluated under the wildlife section (Section 3.4). Emissions that would occur during the proposed construction would be analyzed and disclosed to the public.
Hazardous, Toxic, and Radiological Waste	N	Fuels, lubricants and petroleum products would be used during construction and would be found in RVs. However, these are not considered hazardous, toxic or radiological waste products. JBLM including the project site is within the Tacoma Smelter Plume. Areas of soil disturbance will be analytically screened for arsenic and lead content. Analysis will inform appropriate worker health and safety, and solid waste handling and disposal procedures.

<b>Resource</b>	<b>Included in Detailed Analysis (Y/N)</b>	<b>Rationale for inclusion or exclusion</b>
Cultural Resources	Y	Analysis is required to determine the extent of any effects the proposed action would have on historic properties.
Socioeconomics and Environmental Justice Communities	N	The proposed project would have no impacts to socioeconomics or environmental justice. The proposed project would occur entirely within the JBLM boundaries. No direct or indirect impacts associated with the proposed action would impact either of these areas of concern.
Public Services and Utilities	Y	Due to the proximity of the nearby wellhead, analysis is required to determine any effects to water. The proposed action would have no substantial effect on electricity, wastewater and stormwater collection, sewer and solid waste, natural gas, oil/petroleum, or telecommunications services.
Public Health and Safety	N	The proposed site is located within the Flightline District of the airfield and all roadway lighting would be dark sky compliant to minimize the light pollution. No impacts to public health and safety would occur.

### 3.1 Land Use and Recreation

The project area is located within the McChord Field Flightline District as part of the larger McChord Field Framework Plan which includes four distinct districts: Flightline, McChord Center, Carter Lake, and Lewis-McChord Link (JBLM 2014b). The McChord Field developable area consists of 1,233 acres out of 4,069 total acres of the McChord Field Cantonment Area. Existing constraints restrict the amount of land available for new development. Built constraints include roads and buildings, operational elements include airfield clear zones which are inflexible constraints that cannot be encroached upon without risking JBLMs ability to accomplish the mission or creating potential safety hazards, environmental constraints such as wetlands, flood zones, environmental restoration sites, and hazardous areas. The total areas of constraints for operational, built, and environmental are respectively 2,014 acres, 1,158 acres, and 995 acres (JBLM 2014b). The topography of the project site is relatively flat and has been identified as a developable area within the overall JBLM Real Property Master Plan and subset McChord Field Vision Plan (JBLM 2014b).

Recreation on McChord consists of several ballfields in McChord Center and Carter Lake, neighborhood parks within family housing, the golf course, and Holiday Park Famcamp, southeast of the Flightline (JBLM 2014b).

#### Threshold Criteria

Impacts would be considered significant if an action: 1) would not be compatible with the surrounding land use, 2) would not conform to zoning and community land use plans and policies, or 3) would substantially affect the quantity or quality of recreation resources, opportunities, or activities.

### **3.1.1 No Action Alternative**

The project site within the Flightline District of McChord Airfield has been identified for future growth potential in the JBLM Real Property Master Plan IDP (JBLM 2014a). Under the No Action Alternative, no RV storage facility would be constructed; however, the site is likely to be developed for a different use. Land use impacts would be consistent with the master plan and be less than significant under the No Action Alternative. There would be no impacts to recreation from the No Action Alternative.

### **3.1.2 McChord Airfield Flightline RV Storage Facility Alternative**

As stated above, the project site has been identified for future development in the JBLM IDP. Construction of the RV storage facility would alter the land use from an undeveloped parcel. Impacts to land use are less than significant as the action is compatible with surrounding land use and conforms to land use plans. The purpose of the project is to support the DFMWR recreation program. Implementation of this alternative would allow for parking spaces for all DoD cardholders currently on the waitlist. Additional spaces would be available for future needs compatible with AR 215-1, paragraph 1-9a, as stated above in Section 1.1 to provide leisure activities that support quality of life within the JBLM community. Establishing a new RV storage facility is additive to the seven existing storage lots and does not generate a change to the quantity or quality of existing recreational resources, opportunities, or activities. There is a benefit to recreation from this alternative; however, impacts are less than significant.

## **3.2 Hydrology and Water Quality**

Water resources are sources of water available for use by humans, flora, or fauna, including surface water, groundwater, and floodplains. Groundwater is classified as any source of water beneath the ground surface and may be used for potable water, agricultural irrigation, and industrial applications (JBLM 2017). JBLM acquires its drinking water from groundwater reserves and springs within the installation. Groundwater is an excellent source of drinking water because of the natural filtration properties of the aquifers. In 2014, the McChord Field drinking water system, within the Flightline District, supplied more than 270 million gallons of drinking water to more than 5,000 consumers (JBLM 2017).

The hydrology of JBLM consists of both stormwater and natural surface waters. The average precipitation for JBLM is 39 inches per year, almost two-thirds of which occurs during the wet season between October and March as a result of storms originating in the Pacific Ocean (JBLM 2014c). When land is in a natural or undeveloped condition, precipitation will infiltrate/percolate the soils and mulch. Much of the rainwater that falls on natural or undeveloped land slowly infiltrates the soil and is stored either temporarily or permanently in underground layers of soil. When the soil becomes saturated with

water or the precipitation exceeds the infiltration capacity of the soil, it begins to flow on the surface. Surface flow moves to waterways such as ditches, channels, streams, and rivers. Stormwater is defined as rainwater that flows off of a site. A site in an undeveloped or natural condition can accommodate a larger percentage of rainwater into the soil versus the percentage that flows off as stormwater.

In the Flightline District of McChord Airfield, there are two large drainage streams located south of the proposed project area. Within the Carter Lake district, there is a marshy area within the golf course, and Carter Lake (JBLM 2014b). The two streams south of the proposed project area have wetlands and large flood zones associated with them. Additional wetlands are found within Carter Lake, especially through the golf course (JBLM 2014b). No wetlands are located within the vicinity of the project area.

#### Threshold Criteria

Impacts to hydrology and water quality would be considered significant if an action would 1) alter the existing pattern of surface or groundwater flow or drainage in a manner that would adversely affect the uses of the water within or outside the region, 2) degrade groundwater quality in a manner that would reduce the existing or potential beneficial uses of the water, 3) would be out of compliance with existing or proposed water quality standards or other regulatory requirements related to protection or managing water resources, including all requirements of JBLM's Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Permit number WAS-026638, 4) would not comply with the CWA, or 5) would not comply with the SDWA.

#### **3.2.1 No Action Alternative**

Natural infiltration would continue under the No Action Alternative. There would be no impacts to hydrology or water quality as a result of this alternative.

#### **3.2.2 McChord Airfield Flightline RV Storage Facility Alternative**

Infiltration and runoff are impacted through site alterations such as the introduction of impervious surfaces. The higher percentage of impervious surface on a site leads to a reduction in natural infiltration rates. The proposed site layout is intended to use BMPs to treat stormwater on-site which are included in Appendix A. Site re-grading would be required, although the existing topography of the site is relatively flat. The natural drainage pattern of the site would be maintained, and the stormwater discharge would continue to flow to the west.

The MS4 Permit for JBLM outlines the requirements for the discharge of stormwater to waters of the United States and to groundwater of the State of Washington from the installation. These requirements are designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, and to protect water quality in receiving waters. To comply with the MS4 permit, JBLM must implement a Stormwater Management Program to control the quality and quantity of stormwater discharges; detect, remove, and prohibit illicit connections and discharges into the MS4; conduct

education and outreach programs to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts; and comply with public involvement activity requirements. As the construction activities results in disturbance of greater than one or more acres, MWR must require coverage under the 2017 Construction General Permit and coordinate with the Department of Ecology for an electronic notice of intent. JBLM is required to implement and enforce a program to reduce erosion and sedimentation which includes oversight and regulation, enforcement actions, BMPs, pre-construction site plan reviews, a construction site inspection plan, and staff training (JBLM 2017).

Additionally, a Spill Prevention Control and Countermeasures Plan (SPCCP) would be in place to help prevent and respond to any spills. These procedures would help prevent loss of soil and other materials from the work area, in order to prevent sedimentation and release of pollutants into groundwater and storm drains.

No vehicle washing capability would be included. There are risks to groundwater in the unlikely event of fuel and lubricant leaks which could percolate into groundwater. BMPs from the 2019 Stormwater Management manual for Western Washington would be used to ensure specific BMPs are used to reduce any visible damage and visible leaks. As JBLM Stormwater Program would not conduct monthly, or quarterly inspection of the RV Storage Area, the responsibility would reply on MWR to maintain and manage the RV storage area in accordance with the JBLM MS4 permit and guidelines. All RVs to be in good working condition with no visible leaks or damage. This BMP would minimize any impacts to groundwater contamination and the adjacent wellhead.

Overall, compliance with the MS4 Permit and the 2017 Construction General Permit, development of and adherence to a SPCCP, a Stormwater Water Pollution Prevention Plan, an Environmental Protection Plan, and implementation of BMPs from the 2019 Stormwater Management Manual for Western Washington would make impacts to hydrology and water quality less than significant.

### **3.3 Vegetation**

There are several large areas on McChord that have been identified as having dense vegetation within the McChord Field Vision Plan (JBLM 2014b). The plan recommends that these areas be avoided to maintain the natural state or be developed with mitigation. A portion of the proposed project area is identified as a densely vegetated site. The western portion of the site is heavily forested with various trees species. The majority of trees are native including Douglas-fir and Oregon white oak. The proposed site formerly housed the base commander's residence (C. J. Runner, pers. comm., September 14, 2022) and as such contains remnants of ornamental landscaping, including some non-native plant species. To support JBLM's Urban Forestry goals, the disturbance of all trees over six inches diameter at breast height (DBH) and priority habitat tree species such as Oregon white oak should be avoided (JBLM 2014c). Oregon white oak have been identified for protection within JBLM because of the habitat

that it provides to state-listed wildlife species, including the western gray squirrel and several migratory bird species.

#### Threshold Criteria

Impacts would be considered significant if they were to result in substantial permanent conversion or net loss of habitat at a landscape scale.

##### **3.3.1 No Action Alternative**

No impacts to vegetation would result under this alternative.

##### **3.3.2 McChord Airfield Flightline RV Storage Facility Alternative**

During construction, vegetation would need to be cleared including tree removal. The construction area would be clearly delineated prior to the start of construction. Site design to maximize RV storage capacity has been balanced by the need to protect Oregon white oak trees on-site to the extent practicable. The removal of any Oregon white oak trees would be mitigated through planting six (6) 2-inch caliper balled Oregon white oak at an approved off-site location on JBLM for every one (1) tree over 4 inches in DBH removed within the construction footprint. The use of BMPs as listed in Appendix A would minimize impacts to vegetation and minimize the potential for runoff. Additionally, a SPCCP would be in place to help prevent and respond to any spills. These procedures would help prevent loss of soil and other materials from the work area, in order to prevent sedimentation and release of pollutants into groundwater and storm drains. Overall, impacts to vegetation as a result of this alternative would be less than significant.

#### **3.4 Wildlife**

JBLM has a mosaic of productive wildlife habitats by approximately 20 species of reptiles and amphibians, 200 species of birds, 50 species of butterflies, and 50 species of mammals (Army 2010). Species using the area are limited to those that are acclimated to co-existing with humans. The habitats found in, and around oak woodlands and coniferous forests attract a variety of wildlife during some portions of their life cycles. Many invertebrates, including various moths, butterflies, gall wasps, and spiders, live exclusively in association with Oregon white oak (Army 2010). The proposed project area supports several common species including rodents, squirrels, raccoons, and potentially Columbian black tailed deer. There are no special status species identified in the project area (WDFW 2022).

#### Threshold Criteria

Impacts would be considered significant if they were to result in long-term loss or impairment of a substantial portion of local habitat (species dependent) or substantial loss to a species population, including special status species resultant from implementation of the proposed action.

##### **3.4.1 No Action Alternative**

No impacts to wildlife would result from this alternative.

### **3.4.2 McChord Airfield Flightline RV Storage Facility Alternative**

Wildlife that are foraging or resting in the project vicinity at the time of construction may be displaced due to vegetation removal, noise, and movement of machinery. However, any wildlife species in the project vicinity are likely habituated to the existing noise from vehicular traffic, aircraft operations and military training activities. These effects would be temporary, and any displaced animals would likely return to existing vegetated areas within the project site and surrounding areas after construction is completed. There would be permanent loss of habitat to accommodate the 440 proposed RV storage spaces. Some small mammals (moles, voles, mice, etc.) would likely be killed by heavy equipment during construction. Development, construction, or timber harvest operations on JBLM that result in the loss of Oregon white oak trees will be subject to Fish and Wildlife Program mitigations measures. These mitigation measures require MWR to replant six Oregon white oak seedlings to every one tree greater than four inches diameter at breast height that is removed through the direction and coordination with Fish and Wildlife Program staff. The replanting of Oregon white oak trees at a 6:1 ratio at an off-site location would create additional opportunities for foraging, nesting, cover, and refuge for a variety of species. Per JBLM Log Decking Specifications, if the timber is to be harvested, MWR would need to follow Army Regulations 200-1, 4-3 for log decking specifications and the determination of salable timber requirements. The project would not result in long-term loss or impairment of a substantial portion or local habitat or substantial loss to a species population. The size of the project area is small relative to the overall size of JBLM, and impacts would be less than significant.

### **3.5 Air Quality, Noise, and Greenhouse Gas Emissions**

The CAA, as amended in 1990, requires the U.S. Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment. Primary standards set limits to protect public health, and secondary standards set limits to protect public welfare (including protection against decreased visibility and damage to animals, crops, vegetation, and buildings). The NAAQS have been set for six principal pollutants, known as criteria pollutants: nitrogen dioxide, sulfur dioxide, ozone, lead, carbon monoxide, particulate matter less than 2.5 microns in diameter, and particulate matter less than 10 microns in diameter. These standards are based on concentrations averaged over various time periods. Standards for pollutants with acute health effects are based on relatively short-term periods (1-hour, 3-hour, 8-hour, or 24-hour); while additional standards are based on relatively long time periods to gauge chronic effects (annual and quarterly).

Under the General Conformity Rule of the CAA (Section 176(c)) the EPA established statutory requirements for Federal agencies to demonstrate conformity of proposed Federal activities with the State Implementation Plan for attainment of the NAAQS. Certain actions are exempted from conformity determinations, while others are presumed to conform if the total project emissions are below *de minimis* levels.



The USEPA has divided the country into geographical regions known as Air Quality Control Regions (AQCR) to evaluate compliance with NAAQS. The project area is located in the Puget Sound Intrastate AQCR (#229). Regions are either designated as nonattainment areas, where air quality standards are not being met, or attainment areas, where standards are being met. An attainment area may also be designated as a maintenance area if it had previously been classified as a nonattainment area. As of August 2022, Washington State has one area designated nonattainment in Whatcom County (EPA 2022). JBLM including the project area is in attainment with NAAQS for all pollutants, therefore a general conformity analysis is not required.

For attainment areas there are no emissions threshold for which to compare emissions from the proposed action. For these areas, this air emissions analysis used the Prevention of Significant Deterioration definition for a new major source (250 ton/year) as an indicator of significance or non-significance of impacts to Class I areas.

Greenhouse gases include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. These gases effectively trap heat in the lower atmosphere and are thought to contribute to global climate change.

Existing noise sources within the project vicinity are military aircraft and vehicular traffic (including Interstate [I]-5). The project site is bordered by the I-5 65 decibel (dB) noise contour to the west and the McChord Airfield 65 dB noise contour to the east (JBLM 2014b).

#### Threshold Criteria

Impacts to air quality would be considered significant if actions resulted in a violation of NAAQS at the installation boundary or production of hazardous air pollutants exceeding state or federal emission levels at the installation boundary.

#### **3.5.1 No Action Alternative**

Construction activities would not occur under this alternative; therefore, no air quality, noise, or greenhouse gas emissions changes from baseline conditions would result.

#### **3.5.2 McChord Airfield Flightline RV Storage Facility Alternative**

The construction of the RV storage area has the potential to overlap with the McChord Bridge Repair project, which removes Bridges 84004, 84011, and 84018 located in McChord. Due to the overlap in projects, there is probability that the machinery and equipment used in the McChord Bridge Repair project has potential to release emissions including greenhouse gases in the AQCR through the use of mufflers and exhaust systems. Noise impacts are primarily related to wildlife which are discussed in Section 3.4.2 above. Overall, adverse impacts to air quality, noise, and greenhouse gas emissions under this alternative would be localized, minor, and temporary.

### **3.6 Cultural Resources**

JBLM manages a variety of Cultural Resources including archaeological sites, buildings, structures, and American Indian sacred sites and properties of traditional, religious, and cultural significance (JBLM 2013). JBLM is coordinating its review of impacts on Cultural Resources for NEPA with its responsibilities to take into account effects on historic properties as required by Section 106 of the National Historic Preservation Act (NHPA) and in accordance with 36 CFR § 800, the regulations implementing Section 106. JBLM is consulting with the SHPO and THPO and making a good faith effort to identify historic properties and to assess the potential effects on those historic properties from this action. In addition, JBLM is seeking information from the Nisqually Indian Tribe, the Puyallup Tribe of Indians, and the Squaxin Island Tribe, to identify properties to which they may attach religious or cultural significance or other concerns with historic properties that may be affected. There are no known historic properties within the project area.

#### Threshold Criteria

Impacts would be considered significant if the activity: 1) would cause an adverse effect on archaeological, historical, or other cultural site that is listed in or eligible for inclusion in the National Register of Historic Places, and measures minimizing or mitigating the adverse effect of the resource are not implemented, 2) involves construction, repair, or maintenance affecting contributing elements to a historic building or district and historic landscapes, 3) would permanently introduce visual, audible, or atmospheric elements that are out of character with the historic property or alter its setting when setting contributes to the property's qualifications for the National Register of Historic Places, and measures minimizing or mitigating the adverse effect of the resource are not implemented, or 4) would restrict access to a cultural resource of significance to the federally recognized tribes, and no attempt has been made to mitigate or to address issues through government-to-government consultation.

#### **3.6.1 No Action Alternative**

No historic properties would be affected under this alternative.

#### **3.6.2 McChord Airfield Flightline RV Storage Facility Alternative**

It is anticipated that there would be no historic properties affected by this alternative; however, this would be reassessed after historic property identification efforts and following consultation with SHPO and receiving comments from affected Tribes.

### **3.7 Public Services and Utilities**

The EPA designates sole-source aquifers to protect drinking water supplies in areas where few or no alternative sources to the groundwater resource exist and where, if contamination occurred, using an alternative source would be extremely expensive. These areas have no alternative drinking water sources that physically, legally, and economically could supply all those who depend upon the aquifer for drinking water (EPA 2009b as cited in Army 2010). EPA defines a sole-source aquifer as an underground water source that supplies at least 50 percent of the drinking water

consumed in the area overlying the aquifer (EPA 2022). Most of JBLM is underlain by the Central Pierce County Aquifer, which EPA has designated as a sole-source aquifer (Army 2010).

Under the 1990 Growth Management Act, every county and city in Washington undergoing comprehensive planning was required to adopt critical areas ordinances to protect the integrity of natural resources. Many entities within the Nisqually Watershed include Wellhead Protection Areas (WHPAs) as a component of their critical areas' ordinances, with the intention of protecting groundwater quality and supply (Golder Associates 2003). Several WHPAs occur within JBLM including the wellhead adjacent to the project area. A WHPA is defined as the area that lies within the 10-year time of travel zone boundary of a Group A public water system well, as delineated by the water system purveyor pursuant to Washington Administrative Code (WAC) 246-290-135 (Golder Associates 2003 as cited in Army 2010). The WAC requires a WHPA radius of 100 feet.

Additional public services and utilities include roads adjacent to the project site and power lines.

#### Threshold Criteria

Impacts to public services and utilities would be considered significant if an action would: 1) not comply with the SDWA, or 2) permanently disrupt existing utility services or access roads.

#### **3.7.1 No Action Alternative**

Under the No Action Alternative there would be no impacts to public services and utilities.

#### **3.7.2 McChord Airfield Flightline RV Storage Facility Alternative**

The required WHPA radius would be maintained outside of the fenced boundary of the proposed RV storage facility. The existing road located on the site Command Circle would be extended to serve as the main entrance into the RV storage lot and provide access to the existing wellhead. The design incorporates grading and drainage which slope away from the well to reduce the risk of runoff through permeation of the ground into the capture zone of the well. Additionally, BMPs for construction and long-term operations would be incorporated to mitigate potential soil contaminants and groundwater contamination. Electricity to the site would use existing transmission lines to power lighting and gate controls. No existing utility services would be disrupted, and local access roads would be maintained. RVs would drive on local roads to access this storage facility; however, this would not cause a disruption to traffic patterns. Overall, impacts to public services and utilities would be less than significant under this alternative.

#### **4 CUMULATIVE IMPACTS**

The NEPA and the CEQ regulations require Federal agencies to consider the cumulative impacts of their actions. Cumulative effects are defined as, “*the impact on the environment which results from the incremental impact of an action when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions*” (40 CFR § 1508.7). Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. These actions include on- or off-site projects conducted by government agencies, businesses, or individuals that are within the spatial and temporal boundaries of the actions considered.

Current projects at McChord Airfield that are currently ongoing and/or would occur in the near future are primarily maintenance driven. Future projects and development have been identified in the JBLM Real Property Master Plan, IDP, and Vision Plan for the Flightline District of McChord Airfield (JBLM 2014a, 2014b, 2014c). The Washington State Department of Transportation has been implementing I-5 improvements through JBLM starting in 2017. The fourth and final stage of construction (Gravelly-Thorne Connector) is located approximately 2 miles south of the project site and would be constructed during 2023-2025 (WSDOT 2022). Any construction noise would be additive to existing transportation and military aviation noise already present. DoD cardholder presence would be transitory during pick-up and drop-offs of RVs, so noise impacts would be temporary.

Based on the information above, the Army determined that their potential for cumulative impacts to the Flightline District and specifically the project site would be less than significant. The Army’s proposed project would result in individually minor impacts to all of the resources analyzed in Chapter 3. Due to the proposed mitigation for Oregon white oak trees removed for construction, no cumulative impact to vegetation or wildlife is expected to result with the proposed action. Trees would be replanted with directions from and at sites designated by JBLM, Directorate of Public Works, Environmental Division, Fish and Wildlife Biologists.

#### **5 COMPLIANCE WITH LAWS, REGULATIONS AND EXECUTIVE ORDERS**

##### **5.1 Federal Statutes**

###### **5.1.1 American Indian Religious Freedom Act**

The American Indian Religious Freedom Act of 1978 (AIRFA) (42 U.S.C. 1996) establishes protection and preservation of Native Americans’ rights of freedom of belief, expression, and exercise of traditional religions. Courts have interpreted AIRFA to mean that public officials must consider Native Americans’ interests before undertaking actions that might affect their religious practices, including effect on Traditional Cultural Properties.

The project area falls within the traditional territory of the Nisqually Indian Tribe, Puyallup Tribe of Indians and Squaxin Island Tribe. JBLM notified the aforementioned tribes on 31 January 2023, asking the Tribes to identify any concerns and sought information about properties of religious or cultural significance that might be affected by the project. The Tribes did not identify any properties within the APE.

### **5.1.2 Bald and Golden Eagle Protection Act**

The Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d) prohibits the taking, possession or commerce of bald and golden eagles, except under certain circumstances. Amendments in 1972 added to penalties for violations of the act or related regulations.

There are no known eagle nesting sites in the project vicinity (WDFW 2022). Any eagles present in the project vicinity would be disturbed during the vegetation removal and construction of the RV storage facility.

### **5.1.3 Clean Air Act**

The CAA (42 U.S.C. 7401 et seq.), amended in 1977 and 1990, was established “to protect and enhance the quality of the nation’s air resources so as to promote public health and welfare and the productive capacity of its population.” The CAA authorizes the EPA to establish the NAAQS to protect public health and the environment. The CAA establishes emission standards for stationary sources, volatile organic compound emissions, hazardous air pollutants, and vehicles and other mobile sources. The CAA requires the states to develop implementation plans applicable to particular industrial sources.

This EA analyzes effects on air quality from the proposed action, see Section 3.5.2. Although the proposed action increases greenhouse gas emissions, the increase is negligible in the context of all anthropogenic sources of greenhouse gases. Furthermore, the proposed action does not constitute a significant contribution of greenhouse gases and is not anticipated to generate substantial amounts of hazardous air pollutants or generate emissions that would result in NAAQS exceedances.

### **5.1.4 Coastal Zone Management Act**

Under the CZMA of 1972 (16 USCA 1451-1465), Sec. 307(c)(1)(A), “[e]ach Federal agency activity within or outside the coastal zone that affects any land or water use, or natural resource of the coastal zone shall be carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs.”

According to the Washington State Coastal Management Program, Managing Washington’s Coast, a Federal consistency requirement applies when any Federal activity affects any land or water use or natural resource of the coastal zone. Because the effects of the proposed activity will be limited to JBLM and Federal installations are excluded from the definition of a coastal zone under the Act, the action will not affect

any of the designated resources of the coastal zone. Therefore, a consistency determination (Section 307) is not required.

#### **5.1.5 Endangered Species Act**

The ESA (16 U.S.C. 1531-1544), as amended, establishes a national program for the conservation of threatened and endangered species of fish, wildlife, and plants and the habitat upon which they depend. There are no ESA-listed species potentially affected by the proposed action.

#### **5.1.6 Magnuson-Stevens Fishery Conservation and Management Act**

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), as amended by the Sustainable Fisheries Act of 1996 (Public Law 104-267), established procedures designed to identify, conserve, and enhance Essential Fish Habitat (EFH) for those species regulated under a Federal fisheries management plan. Section 305(b)(2) of the Magnuson-Stevens Act requires Federal agencies to consult with the National Marine Fisheries Service on all actions, or proposed actions, authorized, funded, or undertaken by the agency, that may adversely affect EFH. There is no water component of the proposed action and therefore, no impact to EFH.

#### **5.1.7 Federal Water Pollution Control Act**

The Federal Water Pollution Control Act (33 U.S.C. 1251 et seq.) is more commonly referred to as the CWA. This act is the primary legislative vehicle for Federal water pollution control programs and the basic structure for regulating discharges of pollutants into waters of the United States. The CWA was established to “*restore and maintain the chemical, physical, and biological integrity of the nation’s waters.*” The CWA sets goals to eliminate discharges of pollutants into navigable waters, protect fish and wildlife, and prohibit the discharge of toxic pollutants in quantities that could adversely affect the environment.

The Army concludes that the project is not subject to regulation under Sections 401 and 404 of the CWA because the project would not result in any discharge into the navigable waters of the United States. Therefore, the proposed action does not require a 404(b)(1) evaluation or a 401-water quality certification.

Section 402 of the CWA would be triggered by construction because the area of disturbance would be greater than 1 acre. A Storm Water Pollution Prevention Plan will be prepared and an application for a NPDES Construction General Permit will be submitted to the EPA prior to construction.

#### **5.1.8 Migratory Bird Treaty Act**

The MBTA of 1918 implemented the 1916 convention between the United States and Great Britain for the protection of birds migrating between the U.S. and Canada. Similar conventions between the United States and Mexico (1936), Japan (1972) and the Union of Soviet Socialist Republics (1976) further expanded the scope of international protection of migratory birds. In total 836 bird species are protected by this act which

makes it illegal to hunt, pursue, wound, kill, possess, or transport any migratory bird, nest, egg, or part thereof.

Vegetation removal would permanently alter the habitat available at the project site. Oregon white oak trees are being retained to the extent practicable and any oak trees removed would be mitigated. Any displaced birds would likely return to retained trees within the project area after construction is completed and the surrounding undisturbed vegetation outside of the project footprint. With the implementation of BMPs (Appendix A) the proposed action is in compliance with the MBTA.

#### **5.1.9 National Environmental Policy Act**

NEPA (42 U.S.C. 4321 *et seq.*) requires that Federal agencies consider the environmental effects of their actions.

This EA has been prepared pursuant to CEQ regulations that implement NEPA at 40 CFR Chapter V Part 1500-1508 and Army NEPA implementing regulations at 32 CFR 651. Impacts to the human environment as a result of the proposed action are anticipated to be less than significant. However, if any information is found that indicates significant impacts to the human environment may result from the project, the NEPA process would be revisited and an EIS would be prepared as appropriate.

This EA and draft FNSI are available for public review and comment for 30 days, from **DATES**.

#### **5.1.10 National Historic Preservation Act**

Section 106 of the NHPA (54 USC 300101 *et seq.*), as amended, requires Federal agencies to account for the indirect, direct, and cumulative effects of their undertakings on Historic Properties (i.e., archaeological sites, Traditional Cultural Properties, buildings, structures, objects, districts, and landscapes listed in or eligible for listing in the National Register of Historic Places). Section 106 and its implementing regulations at 36 CFR § 800 establish procedures for Federal agencies to follow in identifying Historic Properties and assessing and resolving effects of their undertaking on them in consultation with SHPO, Indian tribes, Native Hawaiians, and the Advisory Council for Historic Preservation, as appropriate.

#### **5.1.11 Native American Graves Protection and Repatriation Act**

The Native American Graves Protection and Repatriation Act (25 USC §§ 3001 *et seq.*) addresses processes and requirements for Federal agencies regarding the discovery, identification, treatment, and repatriation of Native American and Native Hawaiian human remains and cultural items (associated funerary objects, unassociated funerary objects, sacred objects, and objects of cultural patrimony). Consistent with procedures set forth in applicable Federal laws, regulations, and policies, JBLM will preserve and protect natural and cultural resources. Inadvertent discovery protocol and procedures are available as Standard Operating Procedure 7 in JBLM (2010).

#### **5.1.12 Safe Drinking Water Act**

The Sole Source Aquifer program which includes the wellhead adjacent to the proposed project is authorized by Section 1424(e) of the SDWA of 1974 (Public Law 93-523, 42 U.S.C. 300 et. seq), which states:

*"If the Administrator determines, on his own initiative or upon petition, that an area has an aquifer which is the sole or principal drinking water source for the area and which, if contaminated, would create a significant hazard to public health, he shall publish notice of that determination in the Federal Register. After the publication of any such notice, no commitment for federal financial assistance (through a grant, contract, loan guarantee, or otherwise) may be entered into for any project which the Administrator determines may contaminate such aquifer through a recharge zone so as to create a significant hazard to public health, but a commitment for federal assistance may, if authorized under another provision of law, be entered into to plan or design the project to assure that it will not so contaminate the aquifer"* (EPA 2022).

The proposed action maintains a wellhead protection area compliant with the WAC. The design incorporates grading and drainage which slope away from the well to reduce the risk of runoff through permeation of the ground into the capture zone of the well. Additionally, BMPs for construction and long-term operations would be incorporated to mitigate potential soil contaminants and groundwater contamination. The proposed action is in compliance with this Act.

## **5.2 Executive Orders**

### **5.2.1 Executive Order 11988, Protection of Floodplains**

Executive Order 11988 requires Federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy of the floodplain, and to avoid direct and indirect support of floodplain development where there is a practicable alternative. In accomplishing this objective, *"each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by flood plains."* The proposed action would not alter existing floodplain storage.

### **5.2.2 Executive Order 11990, Protection of Wetlands**

EO 11990 encourages Federal agencies to take actions to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands when undertaking Federal activities and programs. There are no wetlands within the project footprint. No net loss of wetlands would occur.



### **5.2.3 Executive Order 12898, Environmental Justice in Minority Populations and Low-Income Populations, and Executive Order 14008, Tackling the Climate Crisis**

EO 12898 directs federal agencies to take the appropriate steps to identify and address any disproportionately high and adverse human health or environmental effects of federal programs, policies, and activities on minority and low-income populations. Minority populations are those persons who identify themselves as Black, Hispanic, Asian American, American Indian/Alaskan Native, and Pacific Islander. A minority population exists where the percentage of minorities in an affected area either exceeds 50 percent or is meaningfully greater than in the general population.

The preferred alternative of establishing an RV storage facility on JBLM would not disproportionately affect minority or low-income populations nor have any adverse human health impacts. The project would not cause long-term increases to any of the eleven Environmental Justice Indexes. Only minor and temporary increases related to construction equipment emissions are anticipated. Other Environmental Justice Indexes unrelated to emissions would remain unaffected (e.g., Superfund proximity, wastewater discharge indicator, etc.). The project is fully within the installation boundary. No interaction with other projects would result in any such disproportionate impacts. No cumulative impacts to environmental justice are expected from interaction of the proposed RV storage facility with other past, present, and reasonably foreseeable projects. Further, tribal governments that are also environmental justice communities in the project area have been engaged and informed about the proposed action. The proposed action would not directly or through contractual or other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin, nor would it have a disproportionate effect on minority or low-income communities.

EO 14008, “Tackling the Climate Crisis at Home and Abroad”, amends EO 12898 and has updated Federal agencies’ responsibilities for assessing environmental justice consequences of their actions. The preferred alternative, which establishes an RV storage facility, would provide a universal benefit to the JBLM community, including disadvantaged minority, low-income, and tribal DoD cardholders.

### **5.2.4 Executive Order 13007, Indian Sacred Sites**

EO 13007, Native American Sacred Sites, directs Federal agencies to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners. Agencies are to avoid adversely affecting the physical integrity of such sacred sites and to maintain the confidentiality of sacred sites when appropriate. The act encourages government-to-government consultation with tribes concerning sacred sites. Some sacred sites may qualify as historic properties under the NHPA.

No sacred sites in the project area have been previously reported; however, JBLM sent letters to the Puyallup Tribe of Indians, the Nisqually Indian Tribe and Squaxin Island Tribe soliciting any knowledge or concerns of religious significance for the APE.

### **5.2.5 Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks**

Executive Order 13045 requires Federal agencies to identify and assess environmental health risks and safety risks that may disproportionately affect children and ensure that policies, programs, activities and standards address disproportionate risks to children that result from environmental health or safety risks. Places that children generally gather include schools, parks, recreational facilities, and day care centers. These facilities exist within and around JBLM, however they are not located within the project vicinity. No disproportionate effects would occur to children as a result of the proposed bridge removal.

### **5.2.6 Executive Order 13175, Consultation and Coordination with Indian Tribal Governments**

Executive Order 13175 requires agencies to be guided by three fundamental principles: 1) uphold the unique legal relationship with Indian Tribal governments as set forth in the U.S. Constitution, treaties, statutes, Executive Orders and court decisions, 2) recognize the right of Indian Tribes to self-government and continue to work with Indian Tribes on a government-to-government basis to address issues concerning Indian Tribal self-government, tribal trust resources and Indian Tribal treaty, 3) recognize the right of Indian Tribes to self-government and support Tribal sovereignty and self-determination. Initial project notification letters were sent to the following Tribes on 31, January 2023.

- Nisqually Indian Tribe
- Puyallup Tribe of Indians
- Squaxin Island Tribe

The EA was submitted to the Tribes for their comments on the proposed action during this public review and comment period.

## **5.3 Treaties**

The Federal trust responsibility to Native American Tribes arises from the treaties signed between Tribes and the U.S. Government. Under Article VI, Clause 2 of the U.S. Constitution, treaties with the Tribes are the supreme law of the land, superior to State laws, and equal to Federal laws. In these treaties, the United States made a set of commitments in exchange for Tribal lands, including the promise that the United States would protect the Tribe's people. The Supreme Court has held that these commitments create a trust relationship between the United States and each Treaty Tribe and impose upon the Federal government "*moral obligations of the highest responsibility and trust.*" The scope of the Federal trust responsibility is broad and incumbent upon all Federal agencies. The U.S. government has an obligation to protect Tribal land, assets, and resources that it holds in trust for the Tribes, and a responsibility to ensure that its actions do not abrogate Tribal treaty rights.

The proposed action has been analyzed with respect to its effects on the treaty rights described above. The proposed RV storage facility as proposed, would not negatively impact Tribal treaty rights.

## **6 COORDINATION**

The NEPA scoping process is described above in Section 1.5. Coordination has occurred or is ongoing with the following agencies and stakeholders:

- Washington State Historic Preservation Officer
- Nisqually Indian Tribe
- Puyallup Tribe of Indians
- Squaxin Island Tribe

## **7 CONCLUSION**

Based on the evaluations contained in this EA, it has been determined that the proposed action to create an RV storage facility in the Flightline District of McChord Airfield on JBLM does not represent a major Federal action significantly affecting the quality of the human environment, and therefore does not require preparation of an EIS.

## **8 LIST OF PREPARERS**

This EA has been prepared for JBLM, with contractual assistance from the U.S. Army Corps of Engineers, Seattle District. The following personnel contributed to the preparation of this document.

Table 8-1. List of preparers.

<b>Name</b>	<b>Education</b>	<b>Years of Experience</b>	<b>Area of Expertise</b>
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Appendix A: Best Management Practices

Best Management Practices (BMPs) and mitigation measures are discussed in Section 2.4 and throughout Chapter 3 by resource. The following list includes all BMPs and mitigation measures as currently proposed.

### **Noise**

- Construction workers working near equipment will wear proper hearing protection as required to minimize exposure to increased noise levels.

### **Air Quality**

- Construction equipment is to meet state and federal emission standards.
- The construction contractor will submit a dust control plan to the Puget Sound Clean Air Agency and provide a copy to JBLM Public Works-Environmental Division.

### **Soils**

- Follow erosion protocols established in the JBLM Integrated Natural Resources Management Plan (INRMP).
- Obtain a National Pollutant Discharge Elimination System Permit. This permit is required for projects that disturb one or more acres. The applicants are required to develop a stormwater pollution prevention plan and implement sediment, erosion, and pollution prevention control measures.
- Revegetate disturbed areas outside of the project footprint with native seed to increase the soils resilience to water and wind erosion.
- Monitor seeded areas for success and reseed as needed.

### **Vegetation and Wetlands**

- Clearing limits will be clearly marked prior to the start of construction.
- Follow pertinent sections of the INRMP in relation to vegetation.
- Identify the location of Oregon white oak trees prior to vegetation removal. Planting six (6) 2-inch caliper balled Oregon white oak at an approved off-site location on JBLM for every one (1) tree over 4 inches in DBH removed within the construction footprint. Trees would be replanted with directions from and at sites designated by JBLM, Directorate of Public Works, Environmental Division, Fish and Wildlife Biologists.
- Follow the Integrated Pest Management (IPM) approach as documented in the IPM plan to prevent and suppress noxious weeds. Techniques in the IPM plan include natural biological control, low-toxicity pesticides, and mechanical control.
- Construction will remain outside of wetland and riparian areas.
- Construction is limited to the project footprint.
- Revegetate areas disturbed as a result of construction activities with native seeds. Seeding is to occur immediately after construction if seasonal timing allows, otherwise seeding will occur during the nearest period for proper seed development and growth.

- During the first year following seeding, broadleaf weed control will be implemented to reduce competition with native vegetation. All treatment, chemicals and application techniques will be coordinated with the JBLM Pest Management Program Coordinator.

### **Wildlife and Birds**

- No new buildings, infrastructure, or landscaping are proposed that will create additional attractions (perches, nesting platforms, or prey habitat features) for raptors, passerines, or other birds that will increase risk of bird strikes at McChord Airfield.

### **Cultural Resources**

- In the event that any archaeological or cultural resources are uncovered during ground disturbing activities, the responsible party shall halt work immediately, protect the discovery, and contact the DPW-ED Cultural Resources Program Manager. Work shall not continue until further instruction by the Cultural Resources Program Manager. The Cultural Resources Program Manager's phone number is 253-477-3891.

### **Hazardous and Toxic Waste**

- Disposal of any hazardous and toxic materials from construction and operational activities will occur at permitted facilities.
- Non-hazardous, hazardous, and Toxic Substances Control Act wastes will be managed by JBLM according to installation requirements, including federal and state laws and regulations.
- A Spill Prevention Control and Countermeasures Plan (SPCCP) will be developed by the contractor and implemented during construction. A SPCCP details practices that will be followed to reduce risk from releasing hazardous material.
- No refueling or servicing of RVs will occur at the storage lot.
- During construction, any spills will be cleaned up and disposed of properly.
- All RVs will be required to remain in working condition with no visible leaks of fuels or fluids.
- JBLM including the project site is within the Tacoma Smelter Plume. Areas of soil disturbance will be analytically screened for arsenic and lead content. Analysis will inform appropriate worker health and safety, and solid waste handling and disposal procedures.