Draft

Environmental Assessment

Addressing Implementation of the Spill Prevention, Control, and Countermeasure Plans for Presidio of Monterey, Ord Military Community, and Sharpe Army Depot

United States Army Garrison Presidio of Monterey

January

2024

Acronyms and Abbreviations

ACM	asbestos-containing material
ADP	Area Development Plan
AR	Army Regulation
AST	aboveground storage tank
BMP	best management practice
CD	Consistency Determination
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DLIFLC	Defense Language Institute Foreign Language Center
DoD	Department of Defense
EA	Environmental Assessment
EO	Executive Order
FEMA	Federal Emergency Management Agency
FNSI	Finding of No Significant Impact
INRMP	Integrated Natural Resources Management Plan
LBP	lead-based paint
MEC	Munition and Explosives of Concern
MSL	mean sea level
NEPA	National Environmental Policy Act
OMC	Ord Military Community
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PG&E	Pacific Gas and Electric
POL	petroleum, oil, and lubricant
Presidio	Presidio of Monterey
RV	Recreational Vehicle
Sharpe	Sharpe Army Depot
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control, and Countermeasure
SVGB	Salinas Valley Groundwater Basin
TGB	Tracy Groundwater Subbasin
UPE	U.S. Army Signal Activity Presidio of Monterey Enclave
U.S.	United States
USAG Presidio	U.S. Army Garrison Presidio of Monterey
U.S.C.	U.S. Code
USEPA	U.S. Environmental Protection Agency
UXO	unexploded ordnance
WOTUS	waters of the U.S.

COVER SHEET

Draft Environmental Assessment
Addressing Implementation of the Spill Prevention, Control, and Countermeasure Plans for Presidio of Monterey, Ord Military Community, and Sharpe Army Depot
Presidio of Monterey, California

Responsible Agency: United States (U.S.) Army Garrison Presidio of Monterey (USAG Presidio).

Report Designation: Draft Environmental Assessment (EA).

Abstract: Spill Prevention, Control, and Countermeasure (SPCC) Plans were recently developed for Presidio of Monterey, Ord Military Community, and Sharpe Army Depot. The SPCC Plans were prepared using the U.S. Environmental Protection Agency's (USEPA's) Tier I Qualified Facilities SPCC Plan template to help prevent discharge of oil into navigable waters or adjoining shorelines. The SPCC Plans were developed to meet the regulatory requirements of the USEPA under Section 311(j)(1)(C) of the Clean Water Act, as amended by the Oil Pollution Act of 1990, and U.S. Army directives outlined in Army Regulation 200-1, *Environmental Protection and Enhancement*.

The USAG Presidio proposes to implement the SPCC Plans, including the management and reporting procedures therein. The purpose of the Proposed Action is to implement the Plans to satisfy USEPA and U.S. Army legal requirements under the Clean Water Act. The Proposed Action is needed because the installation sites qualify as Tier I facilities under USEPA regulations; therefore, USAG Presidio must implement SPCC Plans at the installation sites to prevent oil spills. This EA analyzes the potential for environmental impacts associated with the Proposed Action and No Action Alternative, and will help in determining whether a Finding of No Significant Impact can be prepared or an Environmental Impact Statement is required.

Written comments and inquiries regarding this document should be sent electronically to Ms. Laura Prishmont-Quimby at laura.a.prishmontquimby.civ@army.mil or mailed to the following address:

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Monterey, CA 93944-5004

Privacy Notice for Commenting

Comments on the Draft Environmental Assessment (EA) are requested. Letters or other written comments provided may be published in the Final EA. Comments will normally be addressed in the EA and made available to the public. Any personal information provided will be used only to identify a desire to make a comment or to fulfill requests for copies of the EA or associated documents. Private addresses will be compiled to develop a mailing list for those requesting copies of the EA; however, only the names and organizations of the individuals making comments and specific comments will be disclosed. Personal home and email addresses, and telephone numbers, will not be published in the EA.

Draft

ENVIRONMENTAL ASSESSMENT

ADDRESSING IMPLEMENTATION OF THE SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLANS FOR PRESIDIO OF MONTEREY, ORD MILITARY COMMUNITY, AND SHARPE ARMY DEPOT

PRESIDIO OF MONTEREY, CALIFORNIA

U.S. Army Garrison
Presidio of Monterey

JANUARY 2024

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1. Purpose of and Need for the Proposed Action

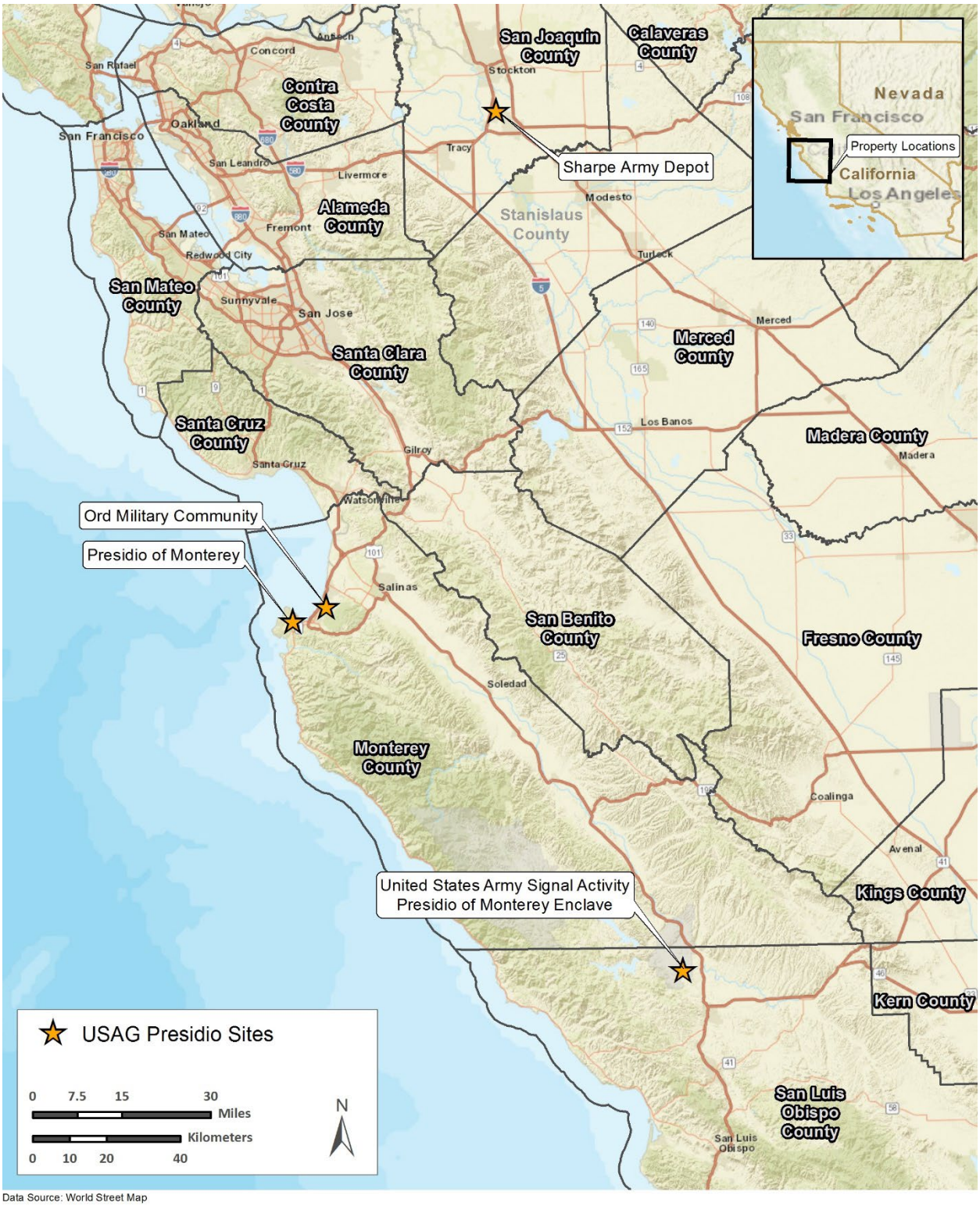
1.1 Introduction

The United States (U.S.) Army Garrison Presidio of Monterey (USAG Presidio) is updating and/or developing Spill Prevention, Control, and Countermeasure (SPCC) Plans for three installation sites, including Presidio of Monterey (Presidio), the Ord Military Community (OMC), and Sharpe Army Depot (Sharpe). The SPCC Plans were prepared to assist the USAG Presidio with prevention, control, and cleanup of oil or other hazardous substance spills. The SPCC Plans are consistent with the U.S. Environmental Protection Agency's (USEPA's) Tier I Qualified Facilities' requirements, set forth by Section 311(j)(1)(C) of the Clean Water Act (CWA) as amended by the Oil Pollution Act of 1990, and U.S. Army directives outlined in Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*. This Environmental Assessment (EA) evaluates the potential environmental impacts associated with implementing the SPCC Plans and alternatives, including the No Action Alternative.

1.2 Background

The USAG Presidio manages the Presidio of Monterey Installation, which consists of four geographically distinct districts, or installation sites: Presidio, OMC, U.S. Army Signal Activity Presidio of Monterey Enclave (UPE), and Sharpe (USAG Presidio 2023a). Presidio and OMC are located within Monterey County, California; UPE is located within northern San Luis Obispo County, California; and Sharpe is located in the City of Lathrop in San Joaquin County, California (**Figure 1-1**). Implementation of the SPCC Plans would only apply to Presidio, OMC, and Sharpe. UPE does not meet the thresholds requiring an SPCC Plan.

The Presidio District occupies 392 acres on a 1.5-mile-long, 0.25-mile-wide stretch of land near the southern end of Monterey Bay and is bordered by the City of Monterey and the City of Pacific Grove (**Figure 1-2**; USAG Presidio 2023a). Presidio is the last presidio in California to have an active military installation and is home to the Defense Language Institute Foreign Language Center (DLIFLC). The mission of the DLIFLC is to provide culturally based foreign language education and training for Department of Defense (DoD) personnel. The DLIFLC comprises eight language schools and the Emerging Language Task Force. In partnership with the DLIFLC, the 229th Military Intelligence Battalion (U.S. Army), the 517th Training Group (U.S. Air Force), and 188th Information Warfare Training Command (U.S. Navy) have produced warrior-linguists for decades at the installation. The District is an academic setting with a population of students, language instructors, support staff, and civilian employees needed to operate an Army installation. The DLIFLC is the largest foreign language training facility in the western world and the primary tenant at Presidio. This military operation helps ensure success of the defense language program and enhances national security.



Data Source: World Street Map

Figure 1-1. USAG Presidio Installation Location

Data Source: World Imagery; World Street Map

Figure 1-2. Presidio District

The OMC District occupies 859 acres of Army-retained land within the city of Seaside, California, from the former Fort Ord that was selected for closure under the Base Realignment and Closure process in 1993 (**Figure 1-3**). The OMC contains privatized military family housing under the Residential Communities Initiative, DoD Center – Monterey Bay, administrative offices, and community support, logistics, and hazardous waste facilities.

The Sharpe District occupies 724 acres in Lathrop, California, which was formerly managed by the Defense Logistics Agency (**Figure 1-4**; USAG Presidio 2023a). Since 2014, USAG Presidio has been the assigned caretaker for Sharpe. Portions of the property have been transferred from the U.S. Army to the U.S. Army National Guard Bureau and the U.S. Army and U.S. Air Force Exchange Service. The Army has no current active mission at the remaining 526-acre site (of the 724 acres total).

Sharpe is currently recognized as an Active National Priorities List Superfund site by the USEPA and is being satisfactorily addressed through federal actions in accordance with the remedy selected by the USEPA (USAG Presidio 2023a). The Army continues ongoing operation of the groundwater and soil vapor treatment systems as remediation efforts.

1.3 Purpose and Need for the Proposed Action

The purpose of the Proposed Action is to implement the SPCC Plans at Presidio, OMC, and Sharpe, including best management practices (BMPs) identified for daily operations. The SPCC Plans provide a description of equipment, workforce, procedures, and training to prevent, control, and provide adequate countermeasures to a discharge of oil or other hazardous substance.

The Proposed Action is needed to satisfy USEPA and U.S. Army legal requirements under Section 311(j)(1)(C) of the CWA, as amended by the Oil Pollution Act of 1990, and U.S. Army directives outlined in AR 200-1, *Environmental Protection and Enhancement*, respectively. The USEPA and U.S. Army legal directives require development and implementation of SPCC Plans for federal facilities that have an aggregate aboveground oil storage capacity greater than 1,320 U.S. gallons, or a completely buried storage capacity greater than 42,000 U.S. gallons, and a reasonable expectation of an oil discharge into or upon navigable waters of the U.S. (WOTUS) or adjoining shorelines (40 Code of Federal Regulations [CFR] Part 112). Further, the USAG Presidio installation districts qualify as Tier I facilities, which are identified as those that have an aggregate aboveground oil storage capacity of 10,000 U.S. gallons or less, and no individual aboveground oil storage containers with a capacity greater than 5,000 U.S. gallons, and meet the oil discharge history criteria defined in 40 CFR Part 112.3(g)(1). Under USEPA and U.S. Army regulations, SPCC Plans must be reviewed every 5 years. The existing Presidio and Sharpe SPCC Plans (USAG Presidio 2013a, DLA 2016) are currently outdated. OMC does not have an existing SPCC Plan, but operates under individual business response plans for onsite diesel fuel tanks (USAG Presidio 2012, 2013b, 2013c). Therefore, none of the installation districts currently meet USEPA or U.S. Army legal requirements under the CWA.

Figure 1-3. OMC District

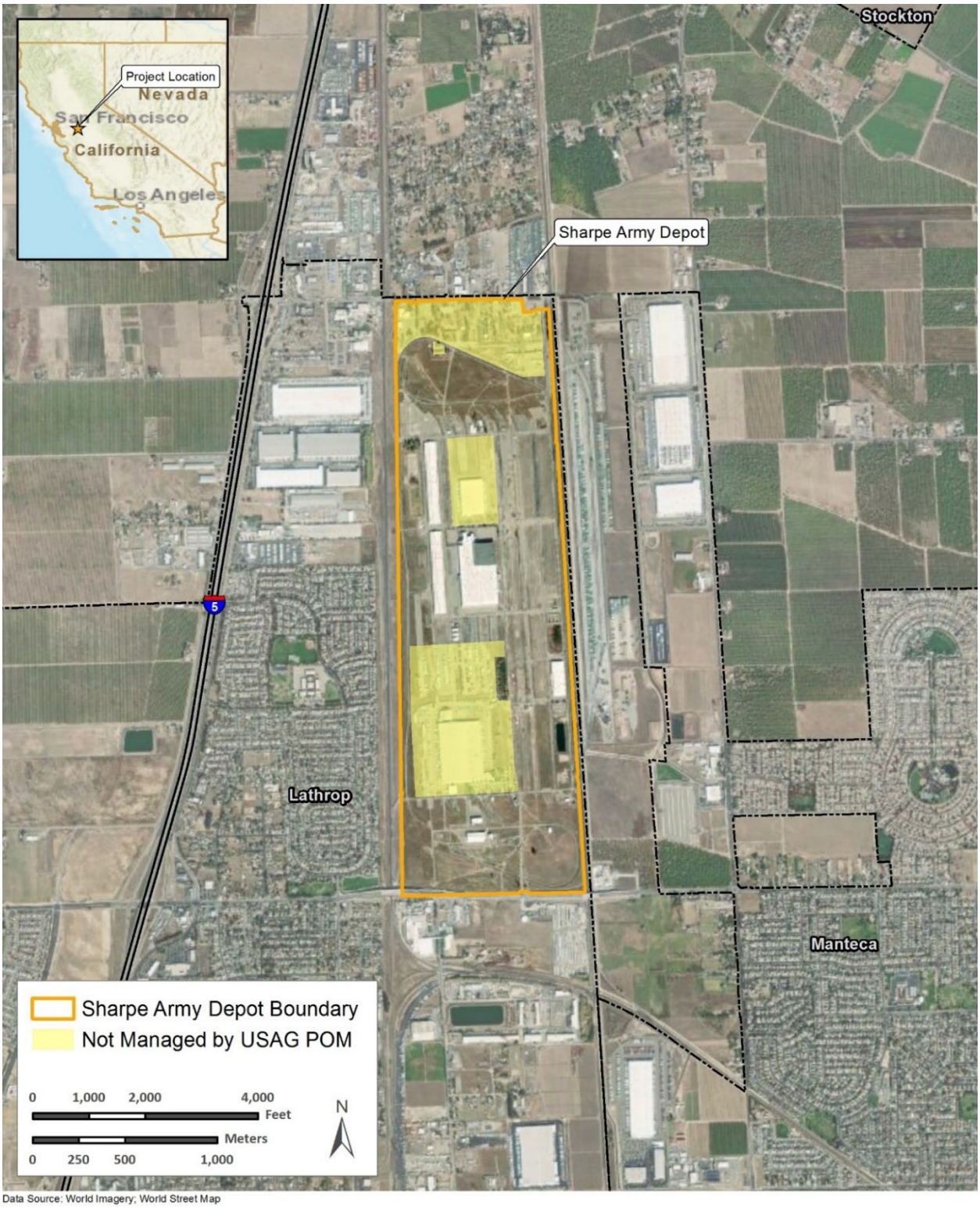


Figure 1-4. Sharpe District

1.4 Scope of the Document

In accordance with the National Environmental Policy Act of 1969 (NEPA; 42 U.S. Code [U.S.C.] §§ 4321–4347), this EA describes and analyzes the potential environmental effects from the proposed implementation of the SPCC Plans. The purpose of the EA is to inform decision makers and the public of these effects of the Proposed Action and alternatives.

Resource areas analyzed in detail in the EA include land use, geological and soil resources, water resources, utilities, hazardous and toxic materials and wastes, human health and safety, and cumulative impacts. **Chapter 3** also provides information on other resource areas that were reviewed but not carried forward for detailed analysis in the EA.

Chapter 2 of the EA presents the scope and locations of the Proposed Action as well as the range of alternatives being considered. Discussions regarding the affected environment and environmental consequences from implementing the Proposed Action, including the reasonably foreseeable impacts analysis and other environmental considerations, are provided in **Chapter 3**. **Chapter 4** provides the names of those who prepared the EA. **Chapter 5** lists the references used in the preparation of the EA.

Appendix A provides the public involvement materials, including the list of stakeholders contacted, and correspondences for this NEPA compliance effort.

1.5 Environmental Compliance Overview

1.5.1 National Environmental Policy Act

NEPA is a federal statute requiring the identification and analysis of potential environmental impacts associated with proposed federal actions before those actions are taken. The intent of NEPA is to help decision makers make well-informed decisions based on an understanding of the potential environmental and socioeconomic consequences, and take actions to protect, restore, or enhance the environment. The U.S. Army's implementing regulation for NEPA is *Environmental Analysis of Army Actions*, 32 CFR Part 651, as amended, which provides a framework for the Army to implement Council on Environmental Quality (CEQ) NEPA regulations and achieve the goals of NEPA.

This EA has been prepared in accordance with NEPA; CEQ's NEPA regulations; the July 16, 2020, version of the CEQ NEPA regulations (85 *Federal Register* 43304–43376); the May 2022 amendments of the 2020 CEQ NEPA regulations (87 *Federal Register* 23453–23470); and the U.S. Army's *Environmental Analysis of Army Actions* (32 CFR Part 651), as amended. The EA will be used to guide the USAG Presidio in implementing the Proposed Action in a manner consistent with U.S. Army standards for environmental stewardship, should the Proposed Action be approved for implementation.

1.5.2 Integration of Oil Storage and Other Environmental Statutes and Regulations

USAG Presidio is required by federal law under Section 311(j)(1)(C) of the CWA, as amended by the Oil Pollution Act of 1990, and AR 200-1 to develop and implement an SPCC Plan, that is reviewed every 5 years, if certain oil storage thresholds are exceeded. The thresholds are whether aggregate aboveground oil storage capacity is greater than 1,320 U.S. gallons or a

completely buried storage capacity is greater than 42,000 U.S. gallons, and there is a reasonable expectation of an oil discharge into or upon navigable WOTUS or adjoining shorelines (40 CFR Part 112). USEPA provides a Tier I Facility template for SPCC Plan development, which includes all required criteria.

Other federal and state laws and regulations that affect SPCC at USAG Presidio, and that were considered during preparation of these SPCC Plans, include the Federal Water Pollution Control Act of 1977; Pollution Prevention Act of 1990; Occupational Safety and Health Act of 1970; Emergency Planning and Community Right-to-Know Act of 1986; Executive Order (EO), *Federal Compliance with Pollution Control Standards*; EO 11990, *Protection of Wetlands*; and EO 11988, *Floodplain Management*.

1.5.3 Agency and Public Participation

NEPA encourages lead agencies responsible for preparation of an EA to coordinate with the public and other governmental agencies, and to solicit input on their Proposed Action early in the decision-making process. This section discusses agency, tribal, and public review of the Draft EA and consultations on the Proposed Action.

Public Involvement. Like NEPA, EO 12372, *Intergovernmental Review of Federal Programs*, as amended by EO 12416 with the same title, requires federal agencies to provide opportunities for consultation with officials of state and local governments that could be affected by a federal proposal. Through the interagency/intergovernmental coordination process, USAG Presidio notifies relevant federal, state, and local agencies, tribes, and officials of the Proposed Action and alternatives and provides them with sufficient time to make known their environmental concerns specific to the action. The process also provides USAG Presidio the opportunity to cooperate with and consider state and local views in implementing the federal proposal.

In addition to government agency involvement, NEPA requirements help ensure that environmental information is made available to the general public during the decision-making process and prior to actions being taken. The U.S. Army promotes public participation as required under NEPA. Consideration of the perspectives and involvement of interested persons support open communication and enable better decision-making.

A Notice of Availability (**Appendix A**) was published on January 25, 2024 in the Monterey County Weekly and the Manteca Bulletin notifying the public of the availability of the Draft EA/Draft Finding of No Significant Impact (FNSI) and initiating the 30-day public comment period. An electronic version of the Draft EA/Draft FNSI is available on the USAG Presidio website at: https://home.army.mil/monterey/index.php/my-fort/all-services/environmental/public-notice-environmental-assessment-and-impact. The Notice of Availability was issued to solicit comments on the Proposed Action and involve local communities in the decision-making process. Public and agency comments on the Draft EA and Draft FNSI will be considered prior to a decision being made on whether to sign the FNSI.

Consultations for Cultural Resources. NEPA requires consideration of impacts on cultural resources (40 CFR Part 1508.1[g][1]). Federal agencies' responsibilities for protecting historic properties is defined primarily by Section 106 of the National Historic Preservation Act. Section 106 requires federal agencies to take into account the effects of their undertakings on

historic properties (i.e., cultural resources eligible for or listed in the National Register of Historic Places) in accordance with 36 CFR Part 800. Cultural resources also may be covered by state and local laws. Because the Proposed Action and alternatives are not expected to affect cultural resources, USAG Presidio has determined that consultation with the California State Historic Preservation Office is not necessary.

Consultation and Coordination with Indian Tribal Governments. The tribal consultation process is distinct from NEPA consultation or the intergovernmental coordination process, and requires separate consultation with all relevant tribes on a government-to-government basis in accordance with EO 13175, Consultation and Coordination with Indian Tribal Governments. The timelines for tribal consultation are also distinct from those of other consultations.

The USAG Presidio has a government-to-government consulting relationship with the following six federally recognized tribes: Picayune Rancheria of the Chukchansi Indians, Santa Rosa Indian Community of the Santa Rosa Rancheria (i.e., Tachi Yokuts), Santa Ynez Band of Chumash Indians, Table Mountain Rancheria, Tule River Indian Tribe of the Tule River Reservation, and the Tuolumne Band of Me-Wuk Indians. The USAG Presidio is consulting with these tribes regarding the Proposed Action.

Consultations for Threatened and Endangered Species. NEPA requires consideration of impacts on natural resources (40 CFR Part 1508.1[g][1]), which include protected wildlife and plant species, and their habitats. The Endangered Species Act establishes a federal program to conserve, protect, and restore threatened and endangered plants and animals as well as their habitats. All federal agencies must ensure any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of an endangered or threatened species, nor result in the destruction of critical habitat for these species, unless the agency has been granted an exemption. Section 7 of the Endangered Species Act establishes a consultation process with the U.S. Fish and Wildlife Service to determine the potential for effects an action might have on federally listed species and designated critical habitats. Because the Proposed Action and alternatives are not expected to affect listed species or their habitats, USAG Presidio has determined that consultation with the U.S. Fish and Wildlife Service is not necessary.

Coastal Zone Management Act (CZMA) Coastal Consistency Determination. As a federal facility along the California coast, USAG Presidio is required to consider impacts on coastal resources under the CZMA, which provides for the management of the nation's coastal resources, with the goal to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone." The California Coastal Commission implements the CZMA for the California Coastal Zone. Because the Proposed Action and alternatives are not expected to adversely affect coastal zone resources, and instead have long-term, minor, beneficial impacts, USAG Presidio has determined that a coastal consistency determination is not necessary.

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2. Description of the Proposed Action and Alternatives

This chapter describes in detail the Proposed Action and alternatives, including the No Action Alternative, for implementation of the SPCC Plans at Presidio, OMC, and Sharpe.

2.1 Proposed Action

The Proposed Action consists of implementating the SPCC Plans at Presidio, OMC, and Sharpe (USAG Presidio 2023b, 2023c, 2023d), including management and reporting procedures outlined in the Plans, which are consistent with the USEPA Tier I facility requirements. The SPCC Plans include the following:

- Inventory of the onsite oil storage containers and capacities
- Certification that secondary containment and oil spill control is implemented for all oil handling containers, equipment, and transfer areas
- Description of the inspection and/or a testing program, and a record of inspections and tests
- List of personnel, training, and discharge prevention procedures
- Inventory of the tanks and containers at the facility with the potential for an oil discharge, the mode of failure, the flow direction and potential quantity of the discharge, and the secondary containment method and containment capacity
- Description of security measures and their implementation
- Description of emergency procedures and notifications
- Contact Information for key facility personnel, state and local emergency response, and cleanup contractors
- The National Response Center notification procedure
- SPCC spill reporting requirements, including California notification requirements
- General SPCC Rule requirements for onshore facilities
- An Oil Spill Contingency Plan, if needed
- Inspections, dike drainage, and personnel training logs, and
- Bulk storage container inspection schedule.

Oil Storage Capacity. As discussed in **Section 1.5.2**, the USEPA dictates oil storage capacity thresholds for federal facilities (**Table 2-1**). Presidio, OMC, and Sharpe all exceed the thresholds for aboveground oil storage capacity, requiring SPCC Plans for Tier I facilities. The current oil storage capacities of Presido, OMC, and Sharpe are listed in **Table 2-1**.

Table 2-1. Oil Storage Capacity in U.S. Gallons at Presidio, OMC, and Sharpe

	USEPA Tier I Thresholds	Presidio	OMC	Sharpe
Aboveground Oil Storage	1,320	4,475	2,370	4,042
Completely Buried Oil Storage	42,000	20,000	40,000	0
Total	**N/A**	**24,475**	**42,370**	4,042

Sources: USAG Presidio 2023b, 2023c, 2023d
Key: USEPA – U.S. Environmental Protection Agency; Presidio – Presidio of Monterey; OMC – Ord Military Community; Sharpe – Sharpe Army Depot; N/A – not applicable

Best Management Practices (BMPs). Management measures that are part of the essential criteria of the SPCC Plans include the following (USAG Presidio 2023b, 2023c, 2023d):

- All personnel involved with the management and handling of oil and hazardous substances must take part in the SPCC training program. This training teaches oil-handling personnel to take defensive measures and cleanup actions in the event of a work-center spill. The training program includes the following key features:
    - Applicable pollution control laws, rules, and regulations
    - General facility operations
    - Review of the SPCC Plan with particular attention to those sections that apply to the work center and any changes that have been made to the Plan since the last training
    - Location of the SPCC Plan
    - Spill history, including past discharges, structural failures, and malfunctioning components, recently developed precautionary measures, and lessons learned
    - Operation and maintenance of equipment to prevent discharges
    - Spill response material locations
    - Discharge response procedure protocols
    - Release reporting procedures
    - Procedures for disposal of recovered materials, and
    - Changes to structures and equipment related to oil storage, handling, and response.
- The Hazardous Waste Program Manager, or their designee, does monthly and annual visual inspections of generator tanks, aboveground storage tanks (ASTs), and associated piping and appurtenances. Inspections include:
    - Tank liquid level gauges are inspected monthly and tested annually following manufacturer's procedures.
    - The Hazardous Waste Program Manager, or their designee, visually inspects the interstitial space of the double-walled tanks on a monthly basis for signs of deterioration, discharges (leaking tank), or accumulation of fuel.
    - Signed records of SPCC-related inspections and test logs are kept by the Hazardous Waste Program Manager for at least 3 years.
- In addition to installation-wide security measures, all tank fill pipes are capped and locked when not in use; tanks do not have drain valves nor dispenser pumps; tanks are

secured in a locked building or fenced area; and generator cabinet doors are locked to prevent unauthorized access to fuel. The installation is well-lit to prevent acts of vandalism and assist in the discovery of oil discharges.

- If a spill occurs, facility personnel follow the response, reporting, and cleanup procedures deemed appropriate to the level of spill. The local fire department for each installation site (i.e., Presidio Fire Department or Lathrop-Manteca Fire District) is the primary spill responder and is reached from any phone by dialing 911. The appropriate fire department serves as the Incident Commander and makes decisions regarding the area to be cordoned off to control the spill.

Spill Response Actions. The SPCC Plans include general spill response actions, applicable to most spills, as well as specific spill response actions for minor or major discharges, which are described in **Table 2-2**. Minor discharges are defined in the SPCC Plans as those that pose no significant harm (or threat) to human health and safety or to the environment, and can usually be cleaned up by facility personnel. Major discharges are those that cannot be safely controlled or addressed by facility personnel, and require more extensive notification and response measures.

2.2 Screening Criteria

In the initial screening of potential alternatives for implementation of the SPCC Plans, USAG Presidio considered minimum screening criteria. The minimum screening criteria for the SPCC Plans proposed for implementation are:

1. Meet the regulatory requirements of the USEPA, under Section 311(j)(1)(C) of the CWA, as amended by the Oil Pollution Act of 1990, and U.S. Army directives outlined in AR 200-1; and
2. Be compatible with the USAG mission at Presidio, OMC, and Sharpe.

2.3 Alternatives Carried Forward for Analysis

The Proposed Action, implementing the SPCC Plans at Presidio, OMC, and Sharpe, is the only action alternative being carried forward for analysis because it is the only alternative considered that meets the screening criteria to be able to support the purpose and need of the Proposed Action, defined in **Section 1.3**. Review of other alternatives that were considered but dismissed from further analysis is provided in **Section 2.5**.

Table 2-2. Spill Response Actions

	Spill Response Actions
General Spills	1. Personnel should shut off ignition sources to eliminate potential spark sources. 2. If possible and safe to do so, personnel should identify and shut down the source of discharge to stop the flow. 3. Personnel should warn other personnel and contact the Hazardous Waste Program Manager or their designee. 4. Personnel should contain the discharge with containers, sorbents, berms, trenches, sandbags, or other material. 5. The Hazardous Waste Program Manager, or their designee, will contact regulatory authorities and the response organization, as necessary, to report the release. 6. Personnel should collect and dispose of recovered products according to regulation.
Minor Discharges	1. Personnel should immediately notify the Hazardous Waste Program Manager. 2. Personnel should contain the discharge with discharge response materials and equipment, and place discharged material and response debris in properly labeled waste containers. 3. The Hazardous Waste Program Manager will complete the discharge notification form in the SPCC Plan.
Major Discharges	1. Safety of personnel is the primary concern; no countermeasures that risk the health or safety of personnel should be undertaken. 2. Personnel should call 911 and the Hazardous Waste Program Manager. 3. Personnel should eliminate all potential sources of ignition, sparks, and others (e.g., cigarettes, open flames, cell phones, other spark-inducing equipment) from the area and provide fire extinguishers near the spill area in case of ignition; personnel should establish fire prevention measures in the spill vicinity. 4. Trained site personnel should stop the source of the leak or spill if possible; if facility personnel feel comfortable containing the spill, they should insert absorbent pads, booms, and sand and/or other oil spill control media to stop the spread of the spill; personnel should place contaminated soils on an impermeable liner for containment. 5. Personnel certified in first aid/cardiopulmonary resuscitation should administer emergency medical treatment and first aid; the Hazardous Waste Program Manager (or senior on-site personnel) must call for medical assistance if workers are injured. 6. If facility personnel are unsure of the hazards involved, the amount of the spill is too large, or a release to navigable waters or adjoining shorelines is threatened, the Hazardous Waste Program Manager (or senior on-site person) must call for outside assistance from a spill cleanup contractor. 7. The Hazardous Waste Program Manager, or their designee, will make any required notifications, including notifying the California Governor's Office of Emergency Services, with complete details of the spill. 8. The Hazardous Waste Program Manager, or their designee, will complete the discharge notification form in the SPCC Plan. 9. The Hazardous Waste Program Manager, or their designee, will coordinate cleanup and contact the preferred response contractor as necessary.

Sources: USAG Presidio 2023b, 2023c, 2023d
Key: USEPA – U.S. Environmental Protection Agency; Presidio – Presidio of Monterey; OMC – Ord Military Community; Sharpe – Sharpe Army Depot; N/A – not applicable

2.4 No Action Alternative

In accordance with the CEQ NEPA regulations codified in 40 CFR Parts 1500–1508, *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*, the No Action Alternative provides the baseline against which the environmental impacts of implementing the range of alternatives addressed can be compared. The U.S. Army NEPA regulations (32 CFR Part 651.34[d]) require consideration of the No Action Alternative, which provides a baseline against which the Proposed Action can be compared. In addition, CEQ NEPA guidance recommends inclusion of the No Action Alternative in an EA to assess any environmental consequences that may occur if the Proposed Action is not implemented. Therefore, the No Action Alternative is carried forward for detailed analysis in the EA.

Under the No Action Alternative, USAG Presidio would not implement updated or new SPCC Plans at Presidio, OMC, or Sharpe. The installation sites would continue to operate under outdated SPCC Plans, or not have SPCC Plans, and would not be in compliance with USEPA and U.S. Army regulations. SPCC Plans must be reviewed every 5 years, and Presidio's and Sharpe's SPCC Plans (DLA 2016, USAG Presidio 2013a) are currently out of date. OMC has not had an SPCC Plan previously, but would continue to operate under individual business response plans for onsite diesel fuel tanks (USAG Presidio 2013b, 2013c, 2013d). The existing SPCC and business response plans do not reflect the current oil storage inventories, inspection and training procedures, security measures, emergency procedures and notifications, contact information, general rule requirements for onshore facilities, National Response Center notification, or SPCC spill reporting requirements.

The No Action Alternative would not meet the minimum screening criteria as described in **Section 2.2**, nor the purpose of and need for the Proposed Action as described in **Section 1.3**, and USAG Presidio would not be in compliance with USEPA and U.S. Army regulations. While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, it is included for analysis in accordance with CEQ and U.S. Army regulations for implementing NEPA.

2.5 Alternatives Considered but Eliminated from Detailed Analysis

Under NEPA, reasonable alternatives must be considered in the EA. Considering alternatives helps to avoid unnecessary impacts and allows an analysis of reasonable ways to achieve the proposed action and satisfy the stated purpose and need. A reasonable alternative must be capable of implementation and meet the screening criteria. The only reasonable alternative considered consists of decreasing aboveground oil storage capacity at the installation sites to below 1,320 gallons in 55-gallon or larger containers, such that SPCC Plans would not be required. This alternative would not meet the screening criteria because it would not be mission compatible. The quantities of oil at the USAG Presidio sites are mission critical because the tanks, generators, and reservoirs serve elevators, provide fleet fueling, and support emergency backup. Therefore, USAG Presidio eliminated this alternative from further consideration and analysis because it failed to meet the screening criteria.

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3. Affected Environment and Environmental Consequences

This section describes the natural and human environment that would be affected by implementation of the Proposed Action and alternatives, including the No Action Alternative. In compliance with guidelines established by NEPA, CEQ regulations, and *Environmental Analysis of Army Actions*, 32 CFR Part 651, as amended, the description of the affected environment focuses on only those aspects potentially subject to impacts. The affected environment description is limited to the installation sites and the adjacent lands.

Sections 3.1 through **3.6** provide the affected environment discussions and analyses for the following resources: land use, geological and soil resources, water resources, utilities, hazardous and toxic materials and wastes, and human health and safety. The impacts analysis for each resource area also addresses the effects of implementing the proposed SPCC Plans concurrently with other reasonably foreseeable actions on or near the installation. Because no impacts are anticipated on the following resource areas, they are not being carried for detailed analysis.

- ***Aesthetics.*** No changes in the viewshed or introduction of new, or changes to existing, visual resources would occur from implementing the SPCC Plans. Therefore, aesthetics is eliminated from further analysis.
- ***Air Quality and Greenhouse Gases.*** Implementation of the SPCC Plans would not result in new emission sources and would result in negligible additional emissions and greenhouse gases. Emissions associated with maintenance requirements would be less than one metric ton of carbon dioxide equivalent annually. Additionally, long-term, negligible, beneficial impacts on air quality would be expected because less volatile organic compounds would potentially be emitted due to proper containment and quick cleanup in the event of a spill. Therefore, air quality is eliminated from further analysis.
- ***Noise.*** Noise levels associated with implementation of BMPs outlined in the SPCC Plans would be in line with noise typical of the installation sites, resulting in no change from baseline conditions. As a result, noise is eliminated from further analysis.
- ***Biological Resources.*** Implementation of the SPCC Plans would not result in disturbance to or removal of vegetation, wildlife or associated habitat, or special status species or critical habitat. Long-term, negligible, beneficial impacts on biological resources would be expected because potential adverse impacts on vegetation and wildlife would be reduced with implementation of appropriate BMPs. Therefore, biological resources are eliminated from further analysis.
- ***Cultural Resources.*** Implementation of the BMPs outlined in the SPCC Plans would not result in ground disturbance on the installation sites or changes to historic architecture or viewsheds. Therefore, cultural resources are eliminated from further analysis.
- ***Socioeconomics and Environmental Justice.*** Implementation of the SPCC Plans would not result in any changes in population levels, employment rates, cost or availability of housing, income levels, characteristics in race or ethnicity, or spending

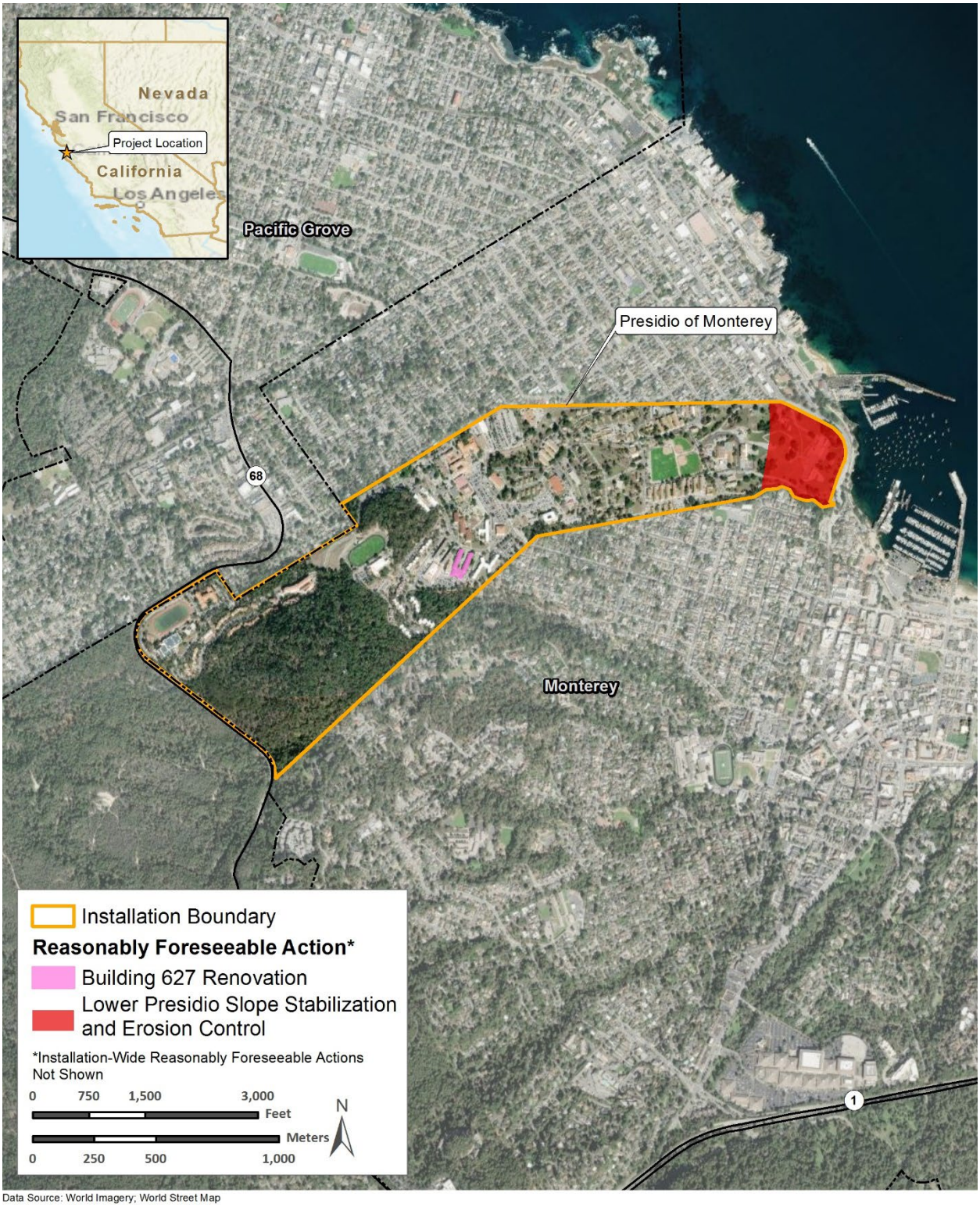
activities on the installation or in the local community. BMPs would be implemented within the installation site boundaries by existing personnel. Therefore, socioeconomics and environmental justice are eliminated from further analysis.

- ***Transportation and Traffic.*** No changes in traffic flow, volume, parking capacity, pedestrian and cyclist access, or public transportation availability and access would result from implementation of the SPCC Plans. As a result, transportation and traffic are eliminated from further analysis.
- ***Climate.*** Implementation of the SPCC Plans would not impact the climate of the region. As a result, climate is eliminated from further analysis.

This EA was prepared in accordance with the 2020 CEQ NEPA regulations (40 CFR Part 1500), as amended in 2022, and therefore analyzes environmental impacts from the Proposed Action combined with potential impacts from reasonably foreseeable actions. CEQ regulations implementing the procedural provisions of NEPA define cumulative effects as follows (40 CFR Part 1508(1)(g)(3)):

> "Effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time."

Past actions are those actions, and their associated impacts, that have shaped the current environmental conditions of the project area. Therefore, the impacts of past actions are now part of the existing environment and are included in the affected environment described in **Sections 3.1** through **3.6**. This EA considers present and reasonably foreseeable actions based out of USAG Presidio, including Presidio, OMC, and Sharpe, and the surrounding areas that could have a causal relationship to the Proposed Action and may result in cumulative impacts. These present and reasonably foreseeable actions are depicted in **Figures 3-1** through **3-3** and listed in **Table 3-1**. The cumulative effects on the environment that would result from the incremental impacts of the Proposed Action, when combined with the potential impacts of the present and reasonably foreseeable actions, are discussed qualitatively in the respective impacts section of each resource area in **Sections 3.1** through **3.6**.



Data Source: World Imagery; World Street Map

Figure 3-1. Reasonably Foreseeable Actions on and around Presidio

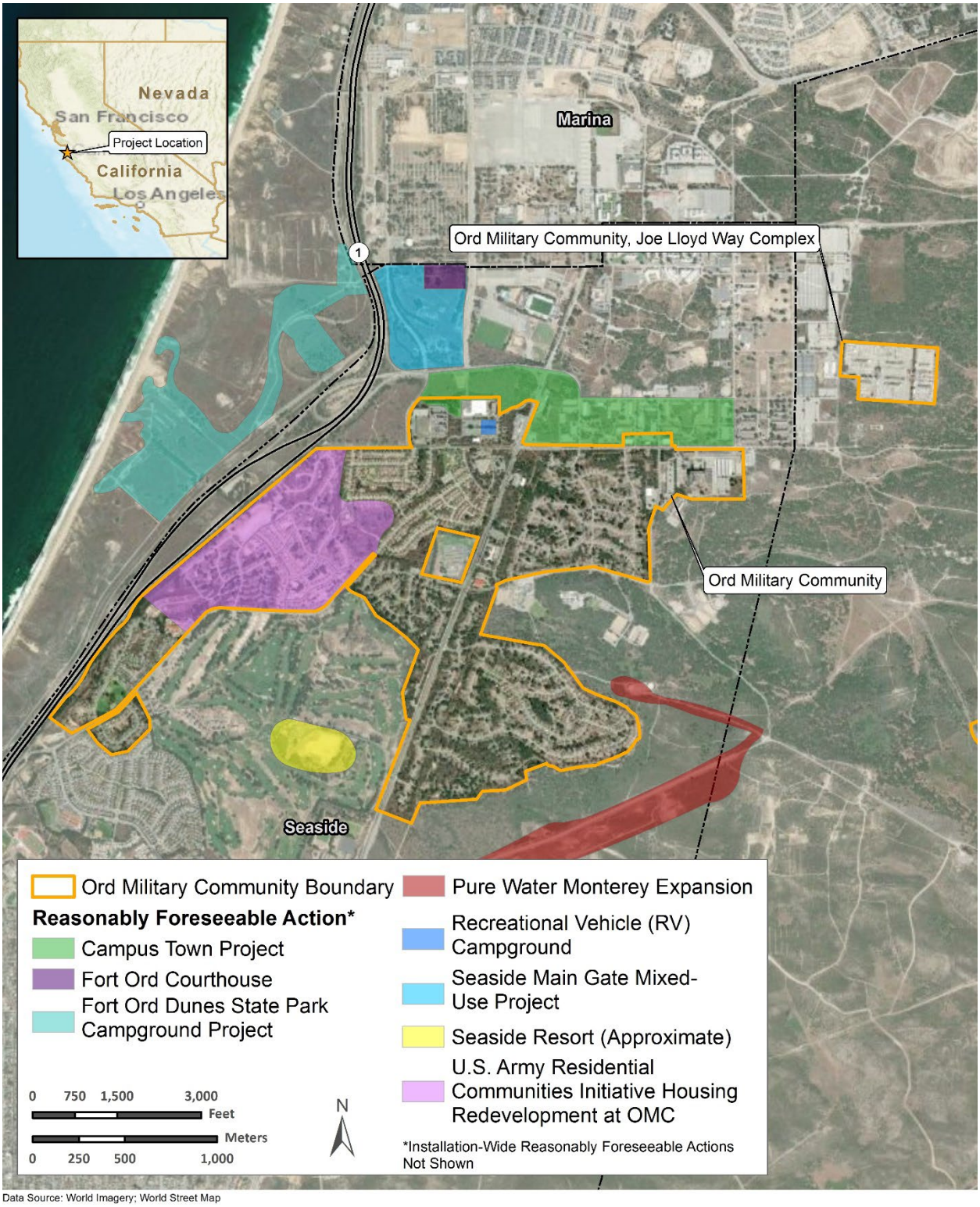
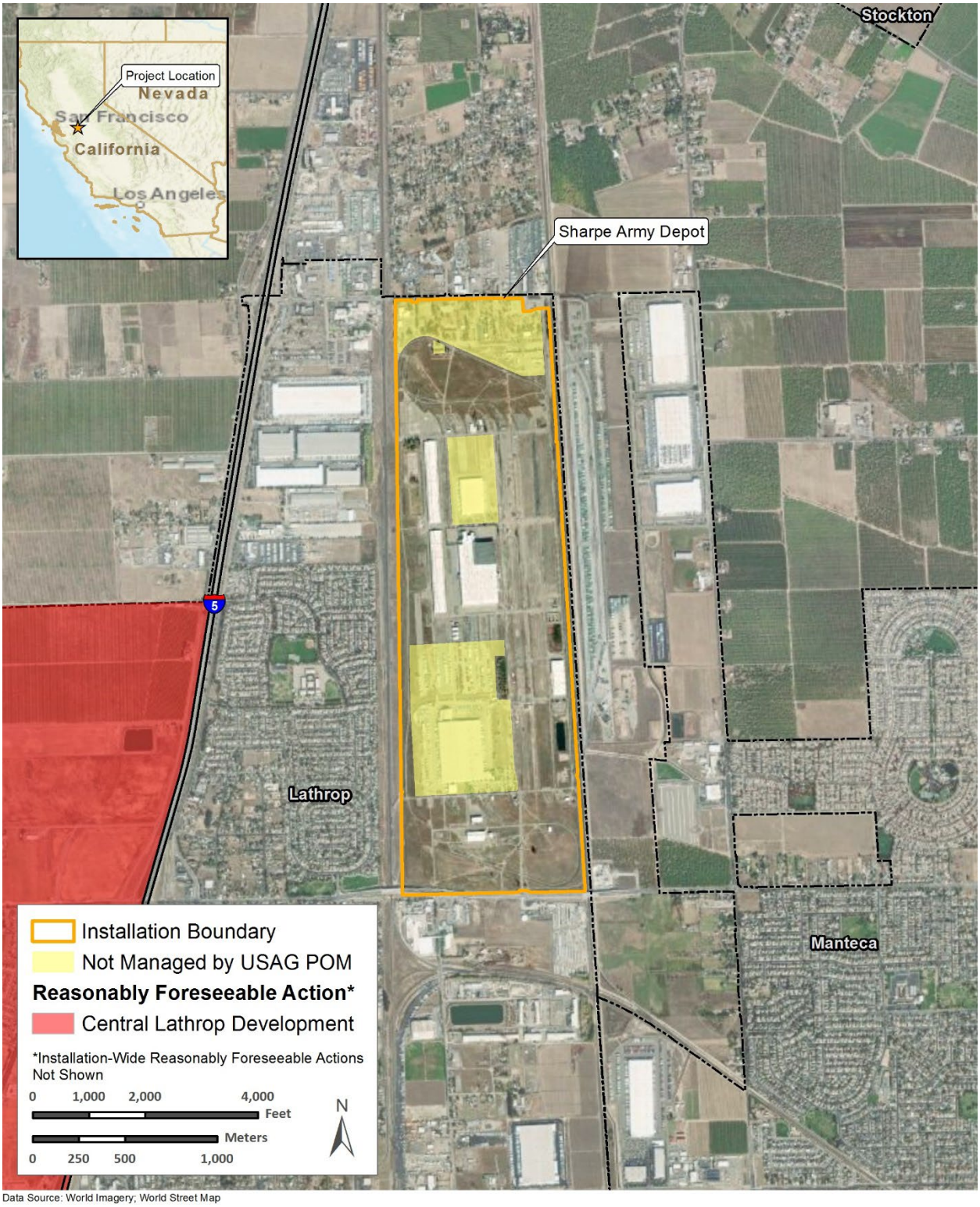


Figure 3-2. Reasonably Foreseeable Actions on and around OMC



Data Source: World Imagery; World Street Map

Figure 3-3. Reasonably Foreseeable Actions on and around Sharpe

Table 3-1. Reasonably Foreseeable Actions for USAG Presidio and Surrounding Area

Project	Applicable USAG Presidio District	Description	Timeframe
USAG Projects			
Implement Updated Integrated Natural Resources Management Plan (INRMP)	Presidio, OMC, and Sharpe	Implement an updated INRMP, associated BMPs, and proposed natural resources conservation projects. *Relationship:* Associated BMPs and proposed natural resources conservation projects could interact with BMPs under the Proposed Action	Future; INRMP is still in draft
Maintenance and Small Construction Projects	Presidio, OMC, and Sharpe	Minor maintenance and small construction projects anticipated include building renovations, road repairs, storm drain repairs, erosion repairs, and sidewalk repairs. *Relationship:* Potential for interaction with stormwater drainage	Future
Lower Presidio Slope Stabilization and Erosion Control	Presidio	Implement slope stabilization and erosion control measures on the eastern most portion of the Presidio, which consists of sloping terrain. A portion of the slope along the northeastern and eastern ends includes a low retaining wall. Directly adjacent to the slope is a public sidewalk and the southbound lanes of Lighthouse Avenue, a main throughfare and one of the only roads connecting Old Monterey and New Monterey that are bisected by the U.S. Army property. The historic retention wall and vegetated slope are no longer functioning. Substantial erosion is resulting in large amounts of sediment deposits on the public sidewalk. This project would use nature-based solutions combined with engineered techniques to stabilize the slope and mitigate the uncontrolled erosion. *Relationship:* Presidio stormwater and water lines run through Lower Presidio	Future
Building 627 Renovation	Presidio	Fully renovate the interior and exterior of Building 627 (a World War II-era building) to bring it up to modern code and efficiency. Building 627 is exempted from further National Historic Preservation Act review under the Advisory Council on Historic Preservation's 2006 Program Comment for Cold War-Era Buildings (1946-1972). *Relationship:* Proximity to a Presidio hydraulic oil reservoir	Future
Recreational Vehicle (RV) campground	OMC	Construct RV parking lot with 30 available spaces, near to the Post Exchange/Commissary on OMC. *Relationship:* Proximity to tanks and stormwater drainage system on OMC	Future

Project	Applicable USAG Presidio District	Description	Timeframe
U.S. Army Residential Communities Initiative Housing Redevelopment at OMC and La Mesa Village, Monterey.	OMC	Redevelop military housing on OMC in the Lower Stillwell neighborhood in four phases over ten years starting in 2019, including demolition of existing 1960‘s-era housing and construction of new housing. Phase I, which consisted of demolition of 176 units, 147 minor renovations, installation of 864 water meters by the local water district, 790 new irrigation meters, and implementation of water efficiency measures in 639 units, is complete. Under the remaining three phases, demolition of 147 units and construction of approximately 275 new units and miscellaneous amenities is anticipated (USAG Presidio 2019). *Relationship:* Proximity to tanks and stormwater drainage system on OMC	2019-2029
Local Off-Installation Projects			
Pure Water Monterey expansion	OMC	Expand the Pure Water Project in the northwest corner of the existing 3.5-acre building area, to the southeast of OMC. The expansion would include installation of additional treatment and pumping equipment, chemical storage, pipelines, and facility appurtenances. In addition, the existing Product Water Pump Station at the Regional Treatment Plant would need to be upgraded. An additional 2,000 feet of 14-inch diameter pipeline for backflushing wells would also be located along the same alignment as the product water pipeline between Well Site #6 and Well Site #7, where the backflush basin would be located, and would continue beyond Well Site #7 for a total length of 2.3 miles (USDOI BOR 2023). *Relationship:* Would connect to OMC water system	2023-Future
Campus Town	OMC	Construct and operate up to 1,485 housing units; 250 hotel rooms; 75 youth hostel beds; 150,0000 square feet of retail, dining, and entertainment uses; 50,000 square feet of office, flex, makerspace, and light industrial uses; and park/recreational areas and supporting infrastructure on approximately 122 acres of the former Fort Ord Army Base near the freeway interchange at Lightfighter Avenue and Highway 1 in Seaside, CA (City of Seaside California 2023a). *Relationship:* Adjoining boundaries	2020-Future

Project	Applicable USAG Presidio District	Description	Timeframe
Fort Ord Courthouse	OMC	Construct a new approximately 83,000 square feet, three-story courthouse, including parking lot and landscaping on an approximately 5-acre parcel. The proposed project site is situated in northern Monterey County, at the northern end of the City of Seaside, southwest of the intersection of Divarty Street and 2nd Avenue on the former Fort Ord Army Base parcel (Judicial Council of California 2023). Relationship: Proximity to OMC in the event of a spill/potential for interaction with OMC stormwater drainage	2025-2028
Fort Ord Dunes State Park Campground	OMC	Construct 98 new campsites, including 43 traditional tent campsites; 45 RV campsites with electrical and water hookups; and a hike/bike/walk-in camping area with 10 walk-in or bike-in style campsites. Construct paved parking spurs, lots, and roadways; three mini-group campsites; four restrooms buildings with showers; a modern campfire center/amphitheater; two camp host sites; and a sewage dump for RVs. Additionally, four of the RV campsites, four of the traditional tent campsites, and two traditional double family sites would be accessible, and the campground would include an accessible dump station, accessible restrooms and showers, compliant parking, routes, and beach access (California State Parks 2023). *Relationship:* OMC stormwater system drains through the proposed Fort Ord Dunes State Park Campground site	Future
Seaside Main Gate Mixed-Use Development	OMC	Develop approximately 60 acres of vacant coastal land near the Main Gate of Army-retained property at the former Fort Ord Army Base and adjacent to Highway 1. The proposed mixed-use project would include retail, entertainment, and hotel. It is expected to provide 250 hotel rooms, 150,000 to 500,000 square feet of gross leasable area. and at least 50,000 square feet of space for chain stores (City of Seaside California 2010). An Environmental Impact Report was completed for the project in 2010. Currently, project planning is underway, including the selection of a design/architectural development team to develop the project. *Relationship:* Proximity to OMC in the event of a spill/potential for interaction with OMC stormwater drainage	Future

Project	Applicable USAG Presidio District	Description	Timeframe
Seaside Resort	OMC	Develop a four-star hotel with approximately 275 rooms, 175 timeshare units, and 125 custom residential lots fronting the redesigned golf courses (City of Seaside California 2023b). *Relationship:* Shares a water line with OMC	Future
Central Lathrop Development	Sharpe	Develop approximately 1,520-acres within the City of Lathrop, including residential neighborhoods with parks and schools; a pedestrian-oriented central city core that includes commercial, civic and cultural uses, a community park, and a high school; commercial areas adjacent to the Interstate-5 freeway corridor; interconnected pedestrian and bicycle pathway system; and a comprehensive park system (City of Lathrop 2004, 2023). *Relationship:* Proximity to Sharpe in the event of a spill/potential for interaction	Future

Key: USAG – U.S. Army Garrison; INRMP – Integrated Natural Resources Management Plan; Presidio – Presidio of Monterey; OMC – Ord Military Community; Sharpe – Sharpe Army Depot; RV – Recreational Vehicle

3.1 Land Use

3.1.1 Definition of the Resource

The term land use refers to real property classifications that indicate either natural conditions or the type of human activity occurring on a parcel. Land use descriptions are codified in installation master planning and local zoning laws. Land use categories do not follow a nationally recognized convention or uniform terminology. As a result, the meanings of various land use descriptions, labels, and definitions vary among jurisdictions.

Natural conditions of property can be described or categorized as unimproved, undeveloped, conservation or preservation area, and natural or scenic area. A wide variety of land use categories result from human activity. Descriptive terms often used include residential, commercial, industrial, agricultural, institutional, and recreational.

The two main objectives of land use planning are to ensure orderly growth and compatible uses among adjacent property parcels or areas. Compatibility among land uses fosters the societal interest of obtaining the highest and best use of real property. Tools supporting land use planning include written master plans and zoning regulations. In appropriate cases, the location and extent of a proposed action need to be evaluated for their potential effects on a project site and adjacent land uses. The primary factor affecting a proposed action in terms of land use is its compliance with applicable land use or zoning regulations. Other relevant factors include existing land use at the project site, the type of land uses on adjacent properties and their proximity to a proposed action, and the duration and permanence of a proposed activity.

The CZMA of 1972, promulgated at 16 U.S.C. § 1451, *et seq.*, defines a coastal zone as land extending from the high tide line on shore “to the outer limit of State title and ownership under the Submerged Lands Act” at 3 or 9 nm from the shoreline, depending on the location. The coastal zone extends inland only to the extent necessary to control the shoreline”. The CZMA encourages coastal states to be proactive in managing coastal zone uses and resources. Under the CZMA, federal actions that have an effect on a coastal use or resource are required to be consistent, to the maximum extent practicable, with the enforceable policies of federally approved Coastal Management Plans. The CZMA was promulgated as a means to “…preserve, protect, develop, and where possible, to restore or enhance, the resources of the Nation’s coastal zones for this and succeeding generations [through] the development and implementation of management programs to achieve wise use of the land and water resources of the coastal zone, giving full consideration to ecological, cultural, historic, and aesthetic values, as well as the needs for compatible economic development…” (16 U.S.C. §§ 1451-1466). The CZMA encourages coastal states to be proactive in managing coastal zone uses and resources and established a voluntary coastal planning program, requiring participating states to submit a Coastal Management Plan to the National Ocean and Atmospheric Administration for approval.

In California, the California Coastal Commission administers an approved Coastal Management Plan to implement the California Coastal Management Program in accordance with the CZMA, the California Coastal Act of 1976 (California Public Resources Code, Section 30000 *et seq*.), McAteer-Petris Act (created the San Francisco Bay Conservation and Development Commission), and Suisun Marsh Preservation Act. Chapter 3 of the California Coastal Act

specifies enforceable policies to protect and expand public access to shorelines, and to protect, enhance, and restore environmentally sensitive habitats, including intertidal and nearshore waters, wetlands, bays and estuaries, riparian habitat, certain woods and grasslands, streams, lakes, and habitat for rare and endangered plants and animals.

For all purposes arising under the CZMA, Section 304(l) excludes from the coastal zone all lands held in trust by or whose uses are subject solely to the discretion of the federal government. Notwithstanding this exclusion, if activities on federal land affect land, water uses, or natural resources of the coastal zone, they must be reviewed for consistency by the California Coastal Management Plan.

3.1.2 Affected Environment

The following policies, guidance documents, and plans guide land use management at USAG Presidio:

- DoD's Unified Facilities Criteria 2-100-01, *Installation Master Planning*, which established a consistent method for managing land across DoD installations,
- AR 420-1, *Army Facilities Management*, which guides land use management specific to the installation,
- USAG Presidio Real Property Master Plan which provides a means for sustainable installation development that supports mission and environmental requirements, and establishes and prescribes planning philosophies and strategies applicable across all U.S. Army installations; and
- Area Development Plans (ADP) for Presidio and OMC, which are collaborative planning tools that define the land use goals, planning objectives, an inventory of existing conditions, and implementing strategies for successfully achieving those goals and objectives at each installation. Because property transfer has been initiated for the Sharpe, the USAG decided not to prepare an ADP for the excessed real property (USAG Presidio 2021).

The U.S. Army's responsibility to its resources and long-term management is done through comprehensive and collaborative planning outlined in the Real Property Master plan. Through this plan, USAG Presidio is divided into districts. One connecting feature for district division is land use patterns. USAG Presidio is comprised of four geographically separated sites: Presidio (the main installation), OMC, UPE, and Sharpe. The Proposed Action concerns implementation of SPCC Plans at only Presidio, OMC and Sharpe.

Presidio. Presidio bisects the City of Monterey and shares part of its borders with the City of Pacific Grove. Under the jurisdictions of the cities of Monterey and Pacific Grove, the neighboring areas are zoned for low to medium density residential use (USAG Presidio 2020a). Segmented by its elevation changes, from west to east, Presidio slopes from approximately 770 feet elevation downward to 30 feet above sea level as it approaches the Monterey Bay. Portions of Presidio are adjacent to the Monterey Harbor Critical Coastal Area and the California Coastal Zone.

The 2021 ADP for Presidio identifies the controlling document and principal tool for implementing the form-based code for the Presidio District, the Regulatory Plan. The Regulating Plan outlines allowable land used into seven categories: Military Standard, Campus Standard, Community Standard, Flex-use Standard, Housing Standard, Protected Space, and Open Space (USAG Presidio 2021). Presidio's primary organization is DLIFLC and includes a variety of facilities that create a campus-like environment. The western part of the installation is commonly referred to as "Upper Presidio." This area is mostly designated as Military Standard and Community Standard land use. Along the middle to eastern part of the hillside the installation is vastly improved, and the majority of the development is within the central DLIFLC campus, within the Campus Standard, Military Standard and Housing Standard land use designations. The Flex Use Standard is located primarily within the middle eastern extent and includes existing landfill areas that are non-buildable. The lowest eastern extent is known as "Lower Presidio." This region includes improved, semi-improved and unimproved grounds within the Presidio Historic District. A portion of this land is leased to the City of Monterey as part of the Lower Presidio Historic Park, designated as Protected Space. Soldier Field is in Lower Presidio adjacent to a set of baseball fields and is used for recreation, within Community Standard (USAG Presidio 2021). Additionally, Open Space areas are located throughout Presidio and provide aesthetic appeal that contributes to the campus-like setting.

OMC. OMC is situated on land that was formerly part of Fort Ord, six miles northeast from Presidio. The Regulating Plan outlined in the 2015 ADP for OMC divides land use into six categories: Administrative Standard, Flex Use Standard, Mixed Use Standard, Community Support Standard, Industrial Standard, and Non-Buildable Area. OMC consists primarily of military family housing, retail services, and mission work (USAG Presidio 2015). Portions of OMC are adjacent to the California Coastal Zone. While there are no tanks located directly adjacent to the coastal zone, there are some tanks located within half a mile of the coastal zone. Additionally, part of the OMC stormwater system discharges in the coastal zone and Monterey Bay.

Sharpe. Since 2014, USAG Presidio has been the caretaker for Sharpe. Portions of the property have been transferred from the U.S. Army to the U.S. Army National Guard and the Army and Air Force Exchange Service. The U.S. Army has no current, active mission at the site and determined that it had no further use for the remaining, approximately 534 acres of land. The U.S. Army therefore recommended that Sharpe be declared excess and surplus, and transferred to the General Service Administration for disposal in accordance with General Service Administration regulations. Until disposal occurs, the U.S. Army manages the property at a baseline level, including operations and maintenance, as needed. Sharpe is a Comprehensive Environmental Response, Compensation, and Liability Act site with ongoing environmental restoration and monitoring activities occurring throughout much of the facility. **Section 3.5** describes in detail restoration activities at the site.

3.1.3 Evaluation Criteria

Understanding potential impacts on land use from a proposed action requires evaluation criteria based on existing and future land use, development, and management. A project could have a significant impact on land use if it were to prevent the viability of a land use or the continued use or occupation of an area; be incompatible with adjacent land use to the extent that public health

or safety is threatened or the installation's mission is compromised; conflict with planning criteria established to ensure the safety and protection of human life and property; or result in noncompliance with laws, regulations, or orders applicable to land use.

For analyzing potential effects on coastal zone management, the evaluation criteria are based on coastal resources in the area and applicable state and federal CZMA policies.

3.1.4 Environmental Consequences

3.1.4.1 PROPOSED ACTION

No adverse impacts on land use would be expected from the implementation of the SPCC Plans at Presidio, OMC or Sharpe. The proposed SPCC Plans would result in proper oil handling operations, spill prevention practices, and discharge or drainage controls through adherence to USEPA and U.S. Army regulations. Additionally, the proper personnel, training, equipment, and resources to prevent oil spills would result in additional protection on navigable waters, adjoining shorelines, and the coastal zone. Therefore, long-term, minor, beneficial impacts on land use would result from the Proposed Action.

Coastal Zone Consistency. Because the Proposed Action would take place at Presidio and OMC, which are adjacent to the coastal zone and the jurisdictional area of the California Coastal Commission, consideration was given to the potential for impacts to coastal resources. Long-term, minor, beneficial impacts on coastal resources local to Presidio and OMC would be expected because potential discharges or spills to the coastal zone directly or via stormwater drainage at Presidio and OMC, respectively, would be reduced in frequency and magnitude with implementation of appropriate SPCC BMPs and secondary containment measures. Thus, the Proposed Action would not alter or jeopardize the coastline or coastal resources at Presidio or OMC. USAG Presidio has determined that the Proposed Action would not have adverse impacts, and would have long-term, minor, beneficial impacts on coastal resources.

No adverse impacts on land use and coastal resources would be expected from implementation of the Proposed Action.

3.1.4.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the USAG Presidio would not implement the proposed SPCC Plans for Presidio, OMC, or Sharpe, including the BMPs and procedures described therein. The existing, outdated Presidio and Sharpe SPCC Plans could still be used, but the inventory, procedures, and contact information, at a minimum, would be outdated and potentially incorrect. Therefore, long-term, minor to moderate, adverse impacts on land use and coastal resources would be expected from outdated prevention and containment procedures, resulting in increased likelihood of a spill, and outdated response procedures which could slow response times. Having outdated information would make it more difficult to keep inventory, which could potentially cause a normally minor accident to become more severe, causing damage to land use and coastal resources. Without established proper cleanup procedures available, contaminants from potential accidents could be absorbed from soil into the groundwater and spread beyond the affected region on the installation. In the Sheridan sandy soil, contaminants would reach groundwater quickly, while spills over the Narlon loamy sand would be expected to require more environmental remediation efforts over a long period of time because of the poor drainage.

Less than significant impacts on land use and coastal resources would be expected under the No Action Alternative.

3.1.4.3 CUMULATIVE IMPACTS

The Proposed Action would contribute long-term, beneficial impacts on land use and coastal resources at the installations where the identified present and reasonably foreseeable projects would be conducted. The Proposed Action would not contribute to changes in existing land use designations or contribute to impacts on coastal zone resources. Therefore, no cumulative adverse impacts on land use and coastal resources would be expected from the reasonably foreseeable projects combined with the Proposed Action.

3.2 Geological and Soil Resources

3.2.1 Definition of the Resource

Geological and soil resources are defined as the topography, geology, and geological hazards of a given area. Topography generally describes the elevation, slope, aspect, and surface features of a given area. Geology includes the surface and subsurface materials, soil, paleontological resources, and composition that may be unique to an area. Soils are the unconsolidated materials overlying bedrock or other parent material. Soils typically are described in terms of their complex type, slope, and physical characteristics. Differences among soil types in terms of their structure, elasticity, strength, shrink-swell potential, and erosion potential affect their abilities to support certain applications or uses. In appropriate cases, soil properties must be examined for their compatibility with particular construction activities or types of land use.

An additional consideration for geology is the classification of prime farmland. Prime farmland is protected under the Farmland Protection Policy Act of 1981 and is defined as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is available for these uses. The intent of the Farmland Protection Policy Act is to minimize the extent that federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses. Unique farmland is land other than prime farmland that is used for the production of specific high-value food and fiber crops. Farmland of statewide and local importance are lands that do not meet the criteria for prime or unique farmland but are considered to be important for the production of food, feed, fiber, forage, and oilseed crops by state or local agencies (7 CFR Part 657).

Geologic hazards are natural geologic events and soil stability that can endanger human lives and threaten property. Due to the overall geology in California, seismic activity is a concern for infrastructure development.

3.2.2 Affected Environment

Presidio. Presidio is located on a peninsula at the southern end of Monterey Bay in California's Central Coast. Presidio faces Monterey Bay to the east with an elevation ranging from approximately 30 to 770 feet above mean sea level (MSL) with two prominent hills, one with an elevation of 595 feet above MSL and another over 770 feet above MSL. The surface consists of fine and loamy sand, specifically Sheridan coarse loamy sand and Narlon loamy fine sand, as well as a small section of pits and dumps soil and underlying material which have been

excavated for refuse disposal. Under the Narlon loamy fine sand, clay subsoil is located at a depth of up to 20 inches. The subsurface below the Sheridan coarse loamy sand is composed of granitic and schistose rock. The Sheridan coarse loamy sand is well drained, has medium runoff rates, and a moderate erosion hazard, while the Narlon loamy fine sand drains somewhat poorly, has slow to medium runoff rates, and a moderate erosion hazard (USAG Presidio 2023a, USDA NRCS 2023). See **Section 3.3.2** for discussion of local groundwater sources. The area is in a moderate to high seismic risk zone due to the Monterey Bay fault running through the county, and the San Andreas Fault Zone located approximately 25 miles northeast (USAG Presidio 2023a, USGS 2018).

Presidio is located on mostly urban land and does not border any prime farmland. The eastern end of Presidio and a small sliver in the south-central portion of the site are categorized as farmland of statewide importance, but are located in an urbanized area, have been previously disturbed and developed, and likely lost their farmland of statewide importance characteristics. Therefore, soils at the installation sites are not considered “farmland” and not subject to the FPPA.

OMC. OMC is also located in the Monterey Bay area of California, along the coast northeast of Presidio. OMC lies on primarily flat land between the Pacific Ocean and the hilly center of Fort Ord with an elevation range of 100 to 450 feet above MSL. Soils at OMC consist primarily of the Oceano and Baywood series, which are both loamy sands. The Oceano series consists of excessively drained soils formed in wind-transported sands on now stabilized dunes. Runoff is slow to medium with high erosion hazard in localized storm drainage areas. The Baywood series is similar to the Oceano series with slow to medium runoff and slight to moderate erosion hazard. The subsurface at OMC consists of granitic rocks (USGS 2023a). See **Section 3.3.2** for discussion of local groundwater sources. Most of OMC is categorized as farmland of statewide importance, though there is no prime farmland in the vicinity. This categorization is located in an urbanized area, has been previously disturbed and developed, and has likely lost its farmland of statewide importance characteristics. Therefore, soils at the installation sites are not considered “farmland” and not subject to the FPPA. Similar to Presidio, OMC is in a moderate to high seismic risk zone due to the Monterey Bay fault running through the county, and the San Andreas Fault Zone located approximately 20 miles northeast (USAG Presidio 2023a, USGS 2018).

Sharpe. Sharpe is located in the city of Lathrop, approximately 131 miles northeast of the Monterey Bay area. It is in the Central Valley of California and is relatively flat with an elevation ranging from 26 feet above MSL at the north end of the site to 20 feet above MSL at the south end (USAG Presidio 2023a). The surface consists of mostly urban land due to extensive alteration of the original soil composition on the installation with some small areas of Veritas fine loamy sand (USDA NRCS 2023). Veritas fine sandy loam is moderately well drained, with slow runoff, rapid permeability, and a moderate erosion hazard. The subsurface is composed of largely nonmarine and some marine sedimentary rocks deposits (California DoC 2023, USGS 2021). See **Section 3.3.2** for discussion of local groundwater sources. Sharpe is located on urban land but is bordered by prime farmland and farmland of statewide importance. Therefore, soils at the installation sites are not considered “farmland” and not subject to the FPPA. The Central Valley does not have faults of its own, but it is bordered by faults to the east and west, classifying it as a moderate seismic risk zone (USAG Presidio 2023a, USGS 2018).

3.2.3 Evaluation Criteria

This section analyzes the relationship between soil composition, geological features, and geology against risk of spill or contamination. It considers:

- Potential impacts on soil
- Potential impacts on groundwater
- Proximity to prime farmland

Significant impacts would result if risks of contamination from spills are greatly prevalent for an alternative in a given area.

3.2.4 Environmental Consequences

3.2.4.1 PROPOSED ACTION

The Proposed Action would result in long-term, minor, beneficial impacts on geological and soil resources of Presidio, OMC, and Sharpe by reducing the likelihood of a spill through proper prevention and containment practices, and by preparing staff to quickly respond to potential spills that could contaminate the area. Potential soil contamination, including contamination of adjacent prime farmland soils, would be reduced by following the rules, procedures, and BMPs outlined in the proposed SPCC Plans, which includes maintaining a list of personnel and storage tanks, implementing security measures and emergency procedures, and using secondary containment for potential contaminants.

Although there are no USEPA or state-specific requirements pertaining to seismic activity for SPCC Plans, secondary containment measures and BMPs at the installation sites factor in minimizing potential seismic activity impacts.

No adverse impacts on geological and soil resources would be expected from implementation of the Proposed Action.

3.2.4.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the USAG Presidio would not implement the proposed SPCC Plans for Presidio, OMC, or Sharpe, including the BMPs and procedures defined therein. The existing, outdated, Presidio and Sharpe plans could still be used, but the inventory, procedures, and contact information, at a minimum, would be outdated and potentially incorrect. Therefore, long-term, minor to moderate, adverse impacts on the geological and soil resources of the three sites and the surrounding regions would be expected from outdated prevention and containment procedures resulting in increased likelihood of a spill, and outdated response procedures which could slow response times. Having outdated information would make it more difficult to keep inventory, which could potentially cause a normally minor accident to become more severe, causing greater damage to local geological and soil resources.

Soil would be the first resource to be affected by a spill. Without proper cleanup procedures available, contaminants would be absorbed from the soil into the groundwater and could spread beyond the affected region on the installation. Additionally, due to the sandy soil, contaminants would reach groundwater quickly. Due to loamy sand’s poor drainage, it is anticipated that a spill would require more environmental remediation efforts over a long period of time.

At Sharpe, a spill could potentially contaminate soil and associated groundwater of prime farmland, which could temporarily affect crops and/or production in the area of the spill prior to remediation by U.S. Army.

Less than significant impacts on geological and soil resources would be expected under the No Action Alternative.

3.2.4.3 CUMULATIVE IMPACTS

Under the Proposed Action, only long-term, beneficial, impacts on geological and soil resources would be expected due to increased preventative measures outlined in the updated SPCC Plans for Presidio, OMC, and Sharpe, which would reduce the risk of spills and potential soil contamination. In combination with the reasonably foreseeable actions identified in **Table 3-1**, such as implementation of an updated INRMP, maintenance and small construction projects, and Lower Presidio Slope Stabilization and Erosion control, these beneficial impacts would be slightly greater due to decreased erosion and soil contamination potential. No cumulative adverse impacts on geological and soil resources would be expected from the reasonably foreseeable projects combined with the Proposed Action.

3.3 Water Resources

3.3.1 Definition of the Resource

Water resources are sources of water available for use by humans, flora, or fauna, including surface water, groundwater, wetlands, floodplains, and nearshore coastal waters. Surface water resources, including but not limited to, stormwater, streams, and wetlands, are important for economic, ecological, recreational, and human health reasons. Groundwater is defined as any source of water beneath the ground surface and may be used for potable water, agricultural irrigation, and industrial applications.

Wetlands are habitats that are subject to permanent or periodic inundation or prolonged soil saturation, and include marshes, swamps, and similar areas. Areas described and mapped as wetland communities may contain small streams or shallow ponds, or pond/lake edges. Water quality describes the chemical and physical composition of water as affected by natural conditions and human activities. Floodplains are relatively flat areas adjacent to rivers, streams, watercourses, bays, or other bodies of water subject to inundations during flood events. Nearshore coastal waters (i.e., Monterey Bay) include the region extending from the land water interface (shoreline) to a location just beyond where the waves are breaking, and are important for human recreation and subsistence.

3.3.2 Affected Environment

3.3.2.1 SURFACE WATER

Presidio. The Presidio is located less than 200 feet from Monterey Bay across Lighthouse Avenue. Surface waters on Presidio include two intermittent streams; Dolphin Creek runs along the southeastern boundary of Presidio near Franklin Street to Lighthouse Avenue and the second stream is on the southern boundary of Presidio in the forested ravine adjacent to Veteran’s Memorial Park (USAG Presidio 2023a). There are no WOTUS identified at Presidio (USGS 2023c).

OMC. OMC is approximately 1400 feet from Monterey Bay across Highway 1. There are no surface waters or WOTUS on OMC (USAG Presidio 2023a, USGS 2023c).

Sharpe. The only surface water features on Sharpe are three percolation/evaporation ponds that have been constructed for the disposal of treated water, and do not function as naturally occurring aquatic ecosystems. Two of the ponds, near the western boundary, receive groundwater from one of Sharpe's aquifer restoration systems. The ponds are approximately 200 feet long and 75 feet wide. The third pond is approximately 500 feet long and 240 feet wide, located along the eastern border of Sharpe (USAG Presidio 2023a). There are no WOTUS identified at the Sharpe (USGS 2023c).

3.3.2.2 GROUNDWATER

Presidio. The Presidio does not overlie or affect the recharge of any groundwater basins. The installation site receives a majority of its potable water from the Carmel Valley Groundwater Basin, which is located less than 3 miles south of Presidio (USAG Presidio 2023a).

OMC. The Salinas Valley Groundwater Basin (SVGB) underlies the installation site and is the primary groundwater and potable water source at OMC. OMC is situated between two sub-basins of the SVGB, Salinas Valley-Seaside and Salinas Valley-Monterey. OMC's water supply is contracted from the Marina Coast Water District, which sources the water from the Salinas Valley - Monterey Groundwater Basin. The Seaside Groundwater Basin, a sub-basin that lies within the greater SVGB, is approximately 24 square miles and adjacent to Monterey Bay. The aquifers are composed of confined and semi-confined aquifers separated by clay aquitards with most recharge coming from surface water rivers (USAG Presidio 2023a).

Groundwater quality on OMC is affected by saline intrusion in the upper aquifer near the beach, and from four groundwater contamination sites on former Fort Ord. The U.S. Army has employed several mitigation methods to clean up contaminated groundwater that do not threaten the water quality of the supply wells (USAG Presidio 2023a). See **Section 3.5** for more information on land use controls.

Sharpe. Sharpe is within the Tracy Groundwater Subbasin (TGB), which is part of the San Joaquin Groundwater Basin. The TGB spans approximately 345,000 acres and is in the San Joaquin River Hydrologic Region. TGB is an unconfined aquifer in the region of the City of Tracy is primarily composed of older and younger alluvium. Older alluvium is loose to moderately compacted silt, sand, and gravel deposits averaging 150 feet in thickness. Younger alluvium is generally unconsolidated silt, sand, and gravel with a thickness of less than 100 feet. Groundwater at Sharpe has had known contamination. See **Section 3.5** for more information on groundwater contamination sites. There are two groundwater wells that are used to pull water from the TGB to supply Sharpe with potable water (USAG Presidio 2023a).

3.3.2.3 FLOODPLAINS

Presidio. According to the FEMA Flood Insurance Rate Map for Presidio, the installation is outside of the 100-year flood zone. Land immediately adjacent to Presidio is defined as an area with minimal flood hazard. On the eastern end of Presidio, land/shoreline across Lighthouse Avenue has been classified as a high-risk coastal flood zone under FEMA (FEMA 2023a).

OMC. FEMA has designated OMC as an area of minimal risk for flooding. The western portion of OMC between General Jim Moore Boulevard and Highway 1, and the southern portion of the installation, are within the risk area for a 500-year flood. OMC is outside of the 100-year floodplain. No flood control measurements are required (FEMA 2023b).

Sharpe. According to FEMA's Flood Insurance Rate Map, Sharpe is within the 500-year floodplain, but not within the 100-year floodplain (FEMA 2023c).

3.3.2.4 WETLANDS

Presidio. There are no known jurisdictional wetlands on Presidio, although two intermittent drainage features have been identified through the National Wetland Inventory (USAG Presidio 2023a, USFWS 2023a).

OMC. The National Wetland Inventory does not identify any wetlands on OMC, only a stormwater management feature in the southwest corner of the site (USAG Presidio 2023a, USFWS 2023b). Additionally, surveys, including biological surveys, conducted on OMC to this point have not identified wetlands on the installation.

Sharpe. There are no known jurisdictional wetlands at Sharpe (USFWS 2023c); however, there are three non-jurisdictional percolation/evaporation ponds onsite that support wetland vegetation (USAG Presidio 2023a).

3.3.3 Evaluation Criteria

Potential impacts on water resources are considered significant if the proposed action would violate water quality standards or waste discharge requirements, or substantially alter the drainage pattern of the site in a manner that would result in erosion, siltation, or flooding on or offsite.

3.3.4 Environmental Consequences

3.3.4.1 PROPOSED ACTION

Long-term, negligible to moderate, beneficial impacts would be expected on surface water and groundwater from implementation of the SPCC Plans under the Proposed Action. Implementation of the proposed SPCC Plans would result in long-term beneficial impacts on water resources through fulfillment of requirements to inventory tanks and containers, identify and manage fuels and potential sources for oil discharges, and gain awareness of flow direction and potential qualities for discharge rates. The SPCC Plans would guide the strategies for spill avoidance and response to minimize the effects on all water resources at or near to Presidio, OMC, or Sharpe. Additionally, the general SPCC Plan requirements for onshore facilities would be beneficial for providing updated standards and additional regulations for facilities extremely close to the ocean. Implementation of the SPCC Plans would minimize risk of oil spills that would impact the ocean, to include Monterey Bay. No adverse impacts on water resources would be expected from implementation of the Proposed Action.

3.3.4.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the USAG Presidio would not implement the proposed SPCC Plans for Presidio, OMC, or Sharpe, including the BMPs and procedures described therein. Because the existing SPCC Plans for Presidio and Sharpe lack updated and accurate tank and

associated secondary containment inventories and spill clean-up procedures, and OMC does not currently have an SPCC Plan, there would be an ongoing risk of contamination of water resources (ground and surface waters and floodplain areas) at and near Presidio, OMC, and Sharpe. Therefore, long-term, minor to moderate, adverse impacts on water resources could occur, which would be less than significant.

3.3.4.3 CUMULATIVE IMPACTS

Under the Proposed Action, long-term, negligible to moderate, beneficial, impacts on water resources would be expected due to increased preventative measures outlined in the updated SPCC Plans for Presidio, OMC, and Sharpe, which would reduce the risk of spills on the installation and potential contamination of local water resources on- and off-installation. In combination with the reasonably foreseeable actions identified in **Table 3-1**, such as implementation of an updated INRMP, maintenance and small construction projects, and Lower Presidio Slope Stabilization and Erosion control, these beneficial impacts would be slightly greater due to decreased erosion and sedimentation potential and subsequent contamination of water resources. No adverse cumulative impacts on water resources would be expected from the reasonably foreseeable projects combined with the Proposed Action.

3.4 Utilities

3.4.1 Definition of the Resource

Utilities refer to public systems established to provide essential services to commercial and residential populations and include potable water, wastewater, stormwater, solid waste, energy/electrical supply, heating and cooling, and communications. Utilities are wholly man-made systems and enable populations in a specified area to function.

3.4.2 Affected Environment

Typical utility services and systems, including potable water, wastewater, stormwater, solid waste, energy/electrical supply, heating and cooling, and communications, are present at Presidio, OMC, and Sharpe. Under the Proposed Action, it is anticipated that there would be no impacts on potable water, wastewater, solid waste, energy/electrical supply, cooling, or communications systems because the Proposed Action does not include any extension or tie-in to these utilities systems, would not increase the demand on these utilities, and would not require short- or long-term interruption in the operation of these utilities. Therefore, only the heating and stormwater systems are carried forward for analysis in this Section.

3.4.2.1 HEATING

Presidio. Heating systems at Presidio are supplied by electricity and natural gas provided by Pacific Gas and Electric (PG&E). PG&E is one of the largest natural gas and electric companies in the U.S. PG&E is based in Oakland, California, serving approximately 4.5 million natural gas customers. All utilities, including electric and natural gas, provided by PG&E are regulated by the California Public Utilities Commission (PG&E 2023). Transformers at Presidio are owned, operated, and maintained by PG&E; therefore, they would not be covered under the proposed SPCC Plans (USAG Presidio 2023e). Some gas is stored in ASTs on the installation site.

OMC. Heating systems and providers at OMC are the same as those described for Presidio.

Sharpe. At Sharpe, heat is supplied by liquified propane gas that comes from PG&E via two meter/regulator stations and underground piping. Some gas is stored in ASTs on the installation site (USAG Presidio 2020b).

3.4.2.2 STORMWATER

Presidio. Stormwater runoff at Presidio discharges into Monterey Bay through seven main storm drains, two of which are open channels. The open stormwater runoff drainage channels are located east of the Huckleberry Hill Nature Preserve, running southwest, exiting Presidio south of the Private Bolio Gate at Franklin Street. The other open stormwater runoff drainage channel runs along the southern border of Presidio, east of the Private Bolio Gate to Presidio at High Street, then to Lighthouse Avenue. The five closed stormwater runoff drains at Presidio are all 24 to 51-inch reinforced concrete pipes throughout the installation. In addition to the main drainage channels and stormwater runoff drains, a series of smaller storm drains collect runoff and discharge into larger drains scattered throughout the installation (USAG Presidio 2023a).

At Presidio, stormwater is managed under a National Pollutant Discharge Elimination System Waste Discharge Requirements for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems General Permit for Phase II Non-Traditional Permittees (State Water Resources Control Board 2013, USAG Presidio 2023a). During applicable construction, stormwater is also managed under a Construction General Permit.

OMC. Similar to Presidio, OMC stormwater runoff discharges into Monterey Bay, ultimately moving into the Pacific Ocean from a 66-inch outfall at the Fort Ord Dunes State Beach. OMC's stormwater management consists of natural channels and constructed stormwater runoff drainage systems. Throughout the installation, constructed drainage features are between 12 and 36 inches in diameter and made from either concrete or metal. OMC storm drains and natural drainage channels collect surface water runoff from the housing and recreational areas, administrative areas, and several small commercial areas. Stormwater channels and drainage patterns are influenced by the topography of the area and not well developed due to sandy/gravely soils (USAG Presidio 2023a).

Sharpe. Stormwater runoff at Sharpe is collected by catch basins and stormwater drains throughout the installation site. Stormwater runoff from Sharpe discharges to the South San Joaquin Irrigation District Canal, which parallels the eastern boundary of the installation site. The district canal drains north into French Camp Slough, a tributary of the San Joaquin River (USAG Presidio 2023a).

3.4.3 Evaluation Criteria

Effects on utilities are evaluated for their potential to disrupt or improve existing levels of service and create additional demands on the stormwater and heating systems. An impact could be significant if a proposed action would exceed capacity of a utility or create a long-term interruption in the operation of a utility.

3.4.4 Environmental Consequences

3.4.4.1 PROPOSED ACTION

Long-term, negligible to moderate, beneficial impacts would be expected on the heating systems at Presidio, OMC, and Sharpe from implementation of the SPCC Plans under the Proposed Action. Implementation of the SPCC Plans described in **Section 2.1** would have beneficial impacts at Sharpe from the certifications of secondary containment; implementation of oil spill control measures for oil handling containers, equipment, and transfer areas; and establishing an Oil Spill Contingency Plan. These specific actions set forth in the proposed SPCC Plan would ensure additional security and regulation for storage tanks associated with the heating systems at Presidio, OMC, and Sharpe.

Long-term, negligible to moderate, beneficial impacts would be expected on stormwater runoff from implementation of the SPCC Plans under the Proposed Action. Impacts on stormwater would be similar to those discussed in **Section 3.3.4.1** on surface water resources.

No adverse impacts on utilities would be expected from implementation of the Proposed Action.

3.4.4.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the USAG Presidio would not implement the proposed SPCC Plans at Presidio, OMC, or Sharpe, including the BMPs and procedures described therein. Long-term, minor, adverse impacts on stormwater could occur under the Proposed Action from the continued adherence to outdated SPCC Plans or lack of an existing SPCC Plan. Because the existing SPCC Plans for Presidio and Sharpe lack updated and accurate tank and associated secondary containment inventories and spill clean-up procedures and OMC does not currently have an SPCC Plan, there would be an ongoing risk of contamination of stormwater at Presidio, OMC, and Sharpe. Therefore, less than significant impacts on utilities would be expected under the No Action Alternative.

3.4.4.3 CUMULATIVE IMPACTS

Under the Proposed Action, long-term, negligible to moderate, beneficial, impacts on stormwater would be expected due to increased preventative measures outlined in the updated SPCC Plans for Presidio, OMC, and Sharpe, which would reduce the risk of spills on-installation and potential contamination of stormwater runoff on- and off-installation. In combination with the reasonably foreseeable actions identified in **Table 3-1**, such as implementation of an updated INRMP, maintenance and small construction projects, and Lower Presidio Slope Stabilization and Erosion control, these beneficial impacts would be slightly greater due to decreased erosion and sedimentation potential and subsequent stormwater runoff and potential contamination. No adverse cumulative impacts on utilities would be expected from the reasonably foreseeable projects combined with the Proposed Action.

3.5 Hazardous and Toxic Materials and Wastes

3.5.1 Definition of the Resource

Hazardous and toxic materials include all chemicals listed by the USEPA under the Superfund Amendments and Reauthorization Act of 1986 (40 CFR Part 355 *et seq*.). Regulation of

hazardous materials, and treatment and disposal of hazardous and toxic wastes, is designed to protect human health and the environment.

The USEPA designates toxic materials and waste as being harmful to or fatal to living organisms when absorbed or ingested. All toxic waste is considered hazardous. Toxic materials and waste that may be present on an installation include asbestos containing materials (ACM), radon, lead-based paint (LBP), and polychlorinated biphenyls (PCB). Munitions and Explosives of Concern (MEC) such as unexploded ordnance (UXO) are also a possible hazard on military installations.

3.5.2 Affected Environment

Hazardous materials and waste are typically stored on military installations inside designated buildings in drums or tanks. On Presidio and Sharpe, the SPCC Plans are deferred to for keeping inventory of hazardous materials and waste such as petroleum, oil, and lubricants (POLs), as well as locations, types of chemicals, buried oil storage, and ASTs. On OMC, the USAG Presidio adheres to individual business response plans for their onsite diesel fuel tanks. Management of hazardous waste at all the installation sites is guided by USAG Presidio's Hazardous Waste Management Plan.

POLs. POLs are generally stored on an installation for use during construction and can be hazardous in high quantities even if stored securely (USAG Presidio 2020b). All three installation sites contain POLs, securely stored along with commercial and industrial substances (USAG Presidio 2019, 2020a, 2020b). POLs are stored on these installation sites in relatively small quantities, and the USAG ensures they are properly stored by regularly preparing compliance documents, such as environmental baseline surveys, to identify and evaluate the storage of POLs. The total aboveground and completely buried oil storage capacities for Presidio, OMC, and Sharpe are discussed in **Section 2.1, Table 2-1**.

Environmental Restoration Sites. Presidio has one restoration site, a closed landfill. OMC has an MMRP area, Parker Flats, that previously contained munitions and ordnances that is located off site to the east on former Fort Ord (USAG Presidio 2015). The U.S. Army Base Realignment and Closure office has employed several mitigation methods to clean up contaminated groundwater that do not threaten the water quality of the supply wells. As discussed in **Section 1.2**, Sharpe is a superfund site regulated under the Comprehensive Environmental Response, Compensation, and Liability Act due to contamination from trichloroethylene (USAG Presidio 2023a). Contaminated sites on Sharpe, which include both soil and groundwater contamination, are located at the northern and southernmost points of the installation, with one trichloroethene-contaminated site in the central portion (USAG Presidio 2020b). Land Use Controls are implemented at Sharpe to mitigate further adverse impacts from the contamination. Additionally, annual monitoring occurs at each of these sites.

ACMs. ACMs are generally a concern in buildings constructed prior to the early 1980s when asbestos was commonly used in construction materials, though they also can still be found in newer building materials. When demolition of facilities containing ACM occurs, asbestos fibers can be released into the air, potentially causing negative health effects for those nearby. All three installation sites have facilities that were constructed before the early 1980s that contain

ACMs (USAG Presidio 2019, 2020a, 2020b). Newer facilities on the installation sites may also contain ACMs.

Radon. Radon is often found in basements or on ground floors of buildings due to radioactive decay of uranium, which is found in all types of rock and soil. Federal law does not require any measures taken regarding radon, but California law requires radon testing and mitigation plans for new construction. The USAG has implemented a Radon Reduction Program to identify and control levels of radon exposure to military personnel and their dependents which is utilized on the three installation sites (USAG Presidio 2020a). Presidio and OMC do not have any substantial amounts of radon in their buildings, and while some buildings on Sharpe on the installation contain radon, the screening levels indicate that they are too low to be harmful to human health (USAG Presidio 2019, 2020a, 2020b).

LBP. LBP was used extensively before 1960 and was banned for use in buildings in 1978. The three installation sites were all established before 1978, which means their facilities have the potential to contain LBP. Presidio developed an LBP Hazard Management Plan that addresses LBP on the installation in housing and non-housing buildings, including identifying and properly disposing of LBP (USAG Presidio 2020a). LBP has been identified at the Presidio, OMC, and Sharpe, and methods are in place for its management, although the amount of LBP present does not warrant any major remedial action (USAG Presidio 2019, 2020b).

PCBs. PCBs are generally found in the remains of electric components such as coolant fluids or fluorescent light fixtures. USAG Presidio follows the Toxic Substances Control Act of 1976 (15 U.S.C. § 2601 *et seq.*), which places restrictions on certain substances to limit the amount of PCBs present in an area (USAG Presidio 2020a). None of the sites have a high amount of PCBs because the largest sources of PCBs have been removed (USAG Presidio 2019, 2020a, 2020b).

MEC and UXO. The presence of MEC is always considered a possibility on any military installation. Due to the history of the sites, Presidio, OMC, and Sharpe most likely do not have any MEC on site. Presidio is an educational institution, so there are no active range or weapons training areas on the installation (USAG Presidio 2020a). OMC was last surveyed for UXO in 1993, and none were found, although there is potential for occurrence throughout the site because MEC was used throughout the former Fort Ord (USAG Presidio 2019). A 2020 review of Sharpe revealed no UXO or any other MEC on the property (USAG Presidio 2020b).

3.5.3 Evaluation Criteria

Impacts on or from hazardous materials and wastes would be considered significant if a proposed action would result in noncompliance with applicable federal or state regulations or increase the amounts of hazardous materials or waste procured or generated beyond current management procedures, permits, and capacities. Impacts on contaminated sites would be considered significant if a proposed action would disturb or create contaminated sites, resulting in negative impacts on human health or the environment, or if a proposed action would make it substantially more difficult or costly to remediate existing contaminated sites.

3.5.4 Environmental Consequences

3.5.4.1 PROPOSED ACTION

Long-term, moderate, beneficial impacts would result from the Proposed Action. The updated SPCC Plans include an inventory of buried oil storage, ASTs, and POLs. An updated inventory allows for better identification of potential sources of contaminants if a leak or spill occurs. Through the SPCC Plans, the installations would have to also report inventory to the USEPA in compliance with the Emergency Planning and Community Right-to-Know Act as part of federal regulation. Emergency spills would be reported to the California Governor's Office of Emergency Services and the National Response Center as per California law.

After obtaining a proper inventory and publishing emergency procedures with relevant staff, secondary containment and proper maintenance of buried oil storage, ASTs, and POLs would be followed. Secondary containment involves containing hazardous liquids that are already stored safely, thereby adding a failsafe to further prevent spills and secondary impacts. Storage tanks and drums of POLs would be checked and modified as appropriate to make sure POLs are not improperly stored and are not at risk of leaking. If a spill were to happen, the SPCC Plans would be followed to properly identify the source of leakage and appropriately manage and remediate the spill.

No impacts on or from contaminated sites, ACMs, radon, LBPs, PCBs, MEC, or UXO or other hazardous and toxic materials and wastes would be expected from implementation of the Proposed Action. Presidio's contaminated site would not be disturbed due to the Proposed Action. OMC's MMRP area is offsite away from major facilities. Sharpe no longer has any underground storage tanks as of 2014, and the Proposed Action would not disturb any of the contaminated sites.

No adverse impacts on hazardous and toxic materials and wastes would be expected due to implementation of the Proposed Action.

3.5.4.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the USAG Presidio would not implement the proposed SPCC Plans for Presidio, OMC, or Sharpe, including the BMPs and procedures described therein. If the SPCC Plans were not updated and implemented, hazardous and toxic materials and waste at Presidio, OMC, and Sharpe would be at an increased risk for spill due to having less accurate data and procedures in place. While Presidio and Sharpe have existing plans from 2013 and 2016 respectively, these are intended to be updated every five years, and do not properly reflect the current state of assets at any of the installation sites. Long-term, minor to moderate, adverse impacts on the hazardous and toxic materials and wastes at the three sites could occur due to increased risk of a spill and use of outdated clean-up procedures in the event of a potential spill.

An outdated SPCC Plan does not allow for the installations to accurately report inventory to the USEPA as part of the Emergency Planning and Community Right-to-Know Act, nor to the Office of Emergency Service and National Response Center, because it requires submitting basic facility identification information, emergency and non-emergency employee contact information, and extensive details on chemicals stored/used at the installations (Environmental Works 2018). The installations would not be compliant with these requirements under the No Action Alternative.

Proper maintenance for new storage tanks would not be outlined in the updated SPCC Plans, and should a spill occur, response and remediation plans would not account for the locations of the new storage tanks, the contents, nor how to properly remediate the spill.

Less than significant impacts on hazardous and toxic materials and wastes would be expected under the No Action Alternative.

3.5.4.3 CUMULATIVE IMPACTS

The Proposed Action would be expected to have long-term, moderate, beneficial impacts on hazardous and toxic materials and waste for Presidio, OMC, and Sharpe. The SPCC Plans would detail processes and procedures that would decrease risk of a spill, and if one were to happen, decrease the risk of severe damage. When combined with BMPs outlined in the proposed updated INRMP and maintenance and small construction projects that would occur to maintain and improve general conditions on the sites, the cumulative beneficial impacts would be slightly greater.

3.6 Human Health and Safety

3.6.1 Definition of the Resource

A safe environment is one in which there is no or an optimally reduced potential for death, serious bodily injury or illness, or property damage. Health and safety address the well-being, safety, and health of contractors, military personnel, and members of the public during the various aspects of a proposed action.

The Occupational Safety and Health Administration (OSHA) and USEPA have the statutory responsibility to ensure the safety and health of the public and workforce within the U.S. (OSHA and USEPA 1991). OSHA regulations address the health and safety of people at work and cover potential exposure to a wide range of chemical, physical, and biological hazards and ergonomic stressors. The regulations are designed to control these hazards by eliminating exposure to the hazards via administrative or engineering controls, use of personal protective equipment, worker training, assigning permissible exposure limits for workplace stressors, and availability of Safety Data Sheets. USEPA responsibilities include the protection of public health and the environment by assuring compliance with federal environmental statutes and regulations.

The health and safety of on-installation military and civilian personnel are safeguarded by numerous DoD and military branch-specific requirements designed to comply with standards issued by OSHA, USEPA, and state occupational safety and health agencies. AR 385–10, *Army Safety Program,* directs U.S. Army policies and procedures to protect and preserve U.S. Army personnel and property against accidental loss providing for operational safety, safe and healthy workplaces, and ensuring compliance with applicable safety laws and regulations.

3.6.2 Affected Environment

To ensure a safe environment, the USAG Presidio commander is charged with ensuring the health and safety of the people living and working on Presidio. Accordingly, the USAG Presidio commander has established The Garrison Safety Program through Command Policy #5, *Safety and Occupation Health*, in compliance with DoD Instruction 6055.1, *DoD Safety and Occupation*

Health Program; DoD Instruction 6055.07, *DoD Accident Investigation*, *Reporting and Record Keeping;* and AR 385-10, *The Army Safety Program*. The Garrison Safety Program directs specific policies, procedures, and responsibilities and applies to all soldiers, civilian professionals, contractors, and volunteers who are on the installation.

USAG Presidio and DLIFLC both prescribe policies, procedures, and responsibilities for safety on the installation within their Safety Standing Operating Procedure (SOP). The SOP applies to the main installation at Presidio, OMC, and Sharpe, as well as the other geographically separated sites. Annual safety plans are published to provide personnel with required safety training requirements and an emergency plan is required to be posted at all facility exits. Safety requirements outlined in the SOP include the following:

- Explosives Safety Management Program
- Radiation Safety
- Respiratory Protection Program
- Contracting Safety
- Industrial Operation Safety
- Occupational Safety and Health Program
- Public, Family, Off-Duty, Recreational, and Seasonal Safety.

Installation managers and supervisors are required to perform risk assessments at Presidio, OMC, and Sharpe prior to operations or activities, as risk management results in safer working environments and reduces occupational hazards (DA 2019, 2020).

3.6.3 Evaluation Criteria

Impacts would be considered significant if a proposed action were to create substantial additional risk to human health or safety. Impacts are assessed to determine if a proposed action would provide any of the following results:

- Substantially increase risks associated with the safety of contractors and construction personnel, military personnel, or the public;
- Substantially hinder the ability to respond to an emergency;
- Introduce a new health or safety risk for which the project proponent or impacted community is not prepared or does not have adequate management and response plans in place.

3.6.4 Environmental Consequences

3.6.4.1 PROPOSED ACTION

Long-term, minor, beneficial impacts on human health and safety would be expected from implementation of the SPCC Plans at Presidio, OMC and Sharpe. Implementation of the SPCC Plans, would result in the proper personnel, training, equipment, and resources to prevent, control, and provide adequate countermeasures to a discharge of oil. By conducting proper oil handling operations and spill prevention practices, and implementing discharge or drainage controls, the risk of personnel and public exposure to oil discharges would be reduced, resulting in a safer working and public health environment. Additionally, the proposed SPCC Plans

include emergency procedures and contact information for key facility personnel, state and local emergency responders, and cleanup contractors, which would provide installation personnel with readily available information on how to respond in the event of a discharge. Therefore, the Proposed Action would decrease risks associated with the safety of contractors and construction personnel, military personnel, and the public, and assist with the ability to respond to an emergency. No adverse impacts on human health and safety would be expected due to implementation of the Proposed Action.

3.6.4.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the USAG Presidio would not implement the SPCC Plans at Presidio, OMC, or Sharpe, including the BMPs and procedures described therein. Presidio and Sharpe would continue to be covered by outdated SPCC Plans and OMC would continue to lack an SPCC Plan. The sites would not be in compliance with USEPA and U.S. Army regulations. Without proper oil handling operations, spill prevention practices, discharge or drainage controls, and the personnel, equipment, and resources to prevent discharges of oil, the No Action Alternative could have long-term, minor, adverse impacts on human health and safety. The No Action Alternative would introduce a safety risk to installation personnel and the public as the installation would not have updated spill prevention measures or response plans in place should a discharge occur, potentially increasing the potential for exposure of personnel and the public to the discharge.

Less than significant impacts on human health and safety would be expected under the No Action Alternative.

3.6.4.3 CUMULATIVE IMPACTS

The reasonably foreseeable actions on USAG Presidio that include construction and renovation have the potential for adverse impacts on construction worker and personnel safety during construction due to the inherent risk of accidents. However, the Proposed Action would not include construction and would not increase the risk of accidents nor have any adverse impacts on human health and safety. Therefore, no adverse cumulative impacts from the reasonably foreseeable projects combined with the Proposed Action would be expected.

3.7 Other NEPA Considerations

3.7.1 Unavoidable Adverse Impacts

Implementation of the Proposed Action would not add to or change the physical or social environment at Presidio, OMC, or Sharpe, and, therefore, would not be expected to result in unavoidable adverse impacts.

3.7.2 Relationship between Short-term Uses and Long-term Productivity

Short-term uses of the human environment include those impacts occurring over a period of less than 5 years, while long-term uses include those impacts occurring over a period of more than 5 years, including permanent resource loss. Implementation of the Proposed Action would not result in short-term uses of the biophysical components of the human environment, or subsequent long-term uses. Therefore, it is not anticipated that the Proposed Action would result in any environmental impacts that would permanently narrow the range of beneficial uses of the environment or pose long-term risks to health, safety, or general welfare of the public.

3.7.3 Irreversible and Irretrievable Commitment of Resources

Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the impacts that the use of these resources would have on future generations. Irreversible impacts primarily result from use or destruction of a specific resource that cannot be replaced within a reasonable timeframe (e.g., energy, minerals). Irreversible and irretrievable commitments of resources usually result from implementation of actions that involve the consumption of material resources used for construction, energy resources, and human labor resources. The use of these resources is considered to be permanent.

Under the Proposed Action, no resource commitments would be expected and, therefore, none would be irreversible or irretrievable.

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A

Public Involvement

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Appendix A: Public Involvement

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Seaside Branch Library, Reference Desk
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Lathrop Library, Reference Desk
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Draft EA General Stakeholder Notification

DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, US ARMY GARRISON, PRESIDIO OF MONTEREY
1759 LEWIS ROAD, SUITE 210
MONTEREY, CA 93944-3223

Office of the Garrison Commander

Dear Interested Parties:

The United States Army Garrison Presidio of Monterey (USAG Presidio) invites all interested parties to review and comment on the Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FNSI) Addressing the Implementation of the Spill Prevention, Control, and Countermeasure (SPCC) Plans for Presidio of Monterey (Presidio), Ord Military Community (OMC), and Sharpe Army Depot (Sharpe) in California.

The USAG Presidio is updating and/or developing SPCC Plans for these three installation sites to assist with prevention, control, and cleanup of potential oil spills. The SPCC Plans are consistent with the United States Environmental Protection Agency's (USEPA's) Tier I Qualified Facilities' requirements, set forth by Section 311(j)(1)(C) of the Clean Water Act as amended by the Oil Pollution Act of 1990. The Draft EA evaluates potential environmental effects from implementing the SPCC Plans at Presidio, OMC, and Sharpe, including the management and reporting procedures outlined in the plans, which are consistent with the USEPA Tier I facility requirements.

The Draft EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, Public Law 91-190, 42 U.S. Code et seq. 4321 et seq.; the July 2020 version of the Council on Environmental Quality regulations for implementing NEPA, 40 Code of Federal Regulations Parts 1500-1508; the May 2022 amendments of the 2020 Council on Environmental Quality NEPA regulations; and Environmental Analysis of Army Actions, 32 Code of Federal Regulations Part 651. The Draft EA evaluates potential environmental impacts of the Proposed Action and Alternatives. No significant adverse impacts would result from the proposed action.

The Draft EA/Draft FNSI will be available for a 30-day review beginning on January 25, 2024. An electronic copy of the Draft EA/Draft FNSI is available on the USAG Presidio website at: https://home.army.mil/monterey/my-fort/all-services/environmental/public-notice-environmental-assessment-and-impact. Hard copies of the Draft EA/Draft FNSI are available at the following locations:

Monterey Public Library 625 Pacific St. Monterey, CA 93940	Seaside Branch Library 550 Harcourt Ave Seaside, CA 93955	Lathrop Branch Library 450 Spartan Way Lathrop, CA 95330

Additional hard copies of the Draft EA/ Draft FNSI are available upon request at POMSPCCPlansEA@hdrinc.com.

Please provide your comments on the Draft EA/Draft FNSI prior to February 26, 2024.

- 2 -

Please forward written comments to:

Presidio of Monterey, Directorate of Public Works
ATTN: AMIM-PMP-E
P.O. Box 5004
Monterey, CA 93944-5004

Via electronic mail to laura.a.prishmontquimby.civ@army.mil

Sincerely,

KLINE.SAMUEL.WILLIAM.1035814716 Digitally signed by KLINE.SAMUEL.WILLIAM.1035814716 Date: 2023.12.14 13:29:08 -08'00'

Samuel W. Kline
Colonel, US Army
Garrison Commander

Draft EA Newspaper Notice of Availability

NOTICE OF AVAILABILITY
Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FNSI) Addressing Implementation of the Spill Prevention, Control, and Countermeasure Plans for Presidio of Monterey, Ord Military Community, and Sharpe Army Depot in California.

The United States Army Garrison Presidio of Monterey (USAG Presidio) invites all interested parties to review and comment on the Draft EA and Draft FNSI addressing the implementation of Spill Prevention, Control, and Countermeasure (SPCC) Plans for Presidio of Monterey (Presidio), Ord Military Community (OMC), and Sharpe Army Depot (Sharpe) in California. The USAG Presidio is updating and/or developing SPCC Plans for these three installation sites to assist the with prevention, control, and cleanup of potential oil spills. The SPCC Plans are consistent with the United States Environmental Protection Agency's (USEPA's) Tier I Qualified Facilities' requirements, set forth by Section 311(j)(1)(C) of the Clean Water Act as amended by the Oil Pollution Act of 1990. The Draft EA evaluates the potential environmental effects from implementation of the SPCC Plans, including management and reporting procedures outlined in the plans, which are consistent with the USEPA Tier I facility requirements.

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Please forward written comments to:

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THE DEADLINE FOR PROVIDING COMMENTS IS FEBRUARY 26, 2024.