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**FINAL**

**ENVIRONMENTAL ASSESSMENT  
FOR BRAC 05 RECOMMENDATIONS FOR  
CLOSURE, DISPOSAL, AND REUSE OF THE SGT. JEROME SEARS  
UNITED STATES ARMY RESERVE CENTER,  
PORTLAND, OREGON  
FAC ID OR010**



**Prepared for:  
88<sup>th</sup> Regional Support Command**

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**February 2011**



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**DRAFT FINDING OF NO SIGNIFICANT IMPACT**

**ENVIRONMENTAL ASSESSMENT FOR**

**CLOSURE, DISPOSAL, AND REUSE OF THE**

**SGT. JEROME F. SEARS US ARMY RESERVE CENTER,**

**PORTLAND, OREGON FACID OR010**

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission recommended that the Department of Defense (DoD) close the Sgt. Jerome F. Sears U.S. Army Reserve Center (USARC) in Portland, OR; and relocate units to a new Armed Forces Reserve Center on Camp Withycombe, OR.

Pursuant to the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and 32 CFR 651 (Environmental Analysis of Army Actions). The U.S. Army Corps of Engineers, Mobile District has prepared an Environmental Assessment (EA) of the potential environmental and socioeconomic effects associated with the closure, disposal, and reuse of the Sgt. Jerome F. Sears USARC, Portland, Oregon.

**PROPOSED ACTION**

The proposed action is the closure, disposal, and reuse of the Sgt. Jerome F. Sears USARC. Reuse of the surplus property made available by the closure of the Sgt. Jerome F. Sears USARC would occur as a secondary action resulting from disposal. The Sgt. Jerome F. Sears USARC, located at 2731 SW Multnomah Boulevard in Portland, Oregon was constructed in 1959. This site consists of approximately 4 acres of developed land with four permanent structures, a 24,104-square-foot administrative building (Sears Hall), a 4,669-square-foot Organizational Maintenance Shop (OMS), a 5,084-squarefoot storage building, and a three-sided cinderblock hazardous materials structure. The Sears USARC property is owned by the US Army Reserve (USAR) 88<sup>th</sup> Regional Support Command.

**ALTERNATIVES CONSIDERED**

**Alternative 1, No Action Alternative**

The No Action Alternative is included as required by the Council on Environmental Quality (CEQ) regulations. The No Action Alternative would be to continue the missions at BRAC-affected installations as they were in April 2010. Because the law mandates closure and realignment of installations, this alternative would not be feasible. Nevertheless, it serves as a baseline alternative against which to compare the other alternatives.

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## **Impacts of Army Closure, Disposal, and Reuse**

The EA also reviews the potential impacts of two implementation alternatives. These alternatives include:

Alternative 2, Caretaker Status; and

Alternative 3, Demolition of Buildings and Construction of Housing Units  
(Preferred Alternative).

### **Alternative 2, Caretaker Status**

Under Alternative 2, the USAR would secure the property after the military mission has ended to ensure public safety and the security of remaining government property and the consideration of any required environmental remediation actions. From the time of operational closure until conveyance of the property, the USAR would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. If the property were not transferred within an agreed-to period of time, under this alternative, the Army would reduce maintenance levels to the minimum level for surplus government property.

### **Alternative, 3, Demolition of Buildings and Construction of Housing Units (Preferred Alternative)**

Under Alternative 3, the Army would transfer the Sears US Army Reserve Center (Sears USARC) to the City of Portland for mixed use affordable housing through the negotiated sale of the property. It is anticipated that the residential reuse will follow the U.S. Department of Housing and Urban Development (HUD) "Housing First Model," which requires that one-fourth of the units be dedicated to the homeless with direct services. The conceptual reuse plan for the site includes demolition of the existing Sears USARC buildings and construction of mixed multifamily units, single family townhomes, a support center, and open space. The anticipated cost of land acquisition from the Army and construction costs of new housing units is estimated to be approximately \$12 to \$14 million for a private developer.

## **FACTORS CONSIDERED IN DETERMINING THAT NO ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED**

The EA which is incorporated by reference into this Finding of No Significant Impact (FNSI) examined potential effects of implementing the proposed action on 12 resource areas for each alternative: land use, aesthetics and visual resources, air quality, noise, geology and soil, water resources, biological resources, cultural resources, socioeconomics, transportation, utilities, and hazardous and toxic substances. The analyses in the EA concluded that there will be no significant adverse or significant beneficial environmental impacts resulting from implementing the proposed action or alternatives because adverse effects to cultural resources will be resolved through implementation of an appropriate mitigation measure specified in the Memorandum of Agreement (MOA). The MOA contains stipulations for a proposed offsite, or substitute,

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mitigation that will preserve and protect the historic character of another USARC in Oregon of similar age, design, and construction as the Sears USARC and that will remain on the USAR inventory through the development of a Historic Building Management Plan. The MOA is required as a mitigation measure to reduce an adverse *effect*, as defined under Section 106 of the National Historic Preservation Action (NHPA) to a non-significant *impact* level, under the National Environmental Policy Act (NEPA).

As a result, only one mitigation measure is required as part of this EA.

## **CONCLUSION**

Based upon the EA, it has been determined that implementation of any of the alternatives will not result in a significant impact on the quality of the human or natural environment. The Army is committed to implementing the Best Management Practices described in the EA. Therefore, issuance of a FNSI is warranted, and preparation of an Environmental Impact Statement is not required and will not be prepared.

It has also been determined that the No Action Alternative will not support Congressional requirements under BRAC law (Public Laws 101-510 and 107-107); consequently, it has not been selected for implementation. Alternative 3 is the preferred alternative of the Army and the Local Redevelopment Authority. This alternative will allow future development in support of the need of affordable housing in the City of Portland and the Southwest Community Plan.

## **PUBLIC AVAILABILITY**

The EA and Draft FNSI have undergone an appropriate 30-day public comment period in accordance with requirements specified in 32 CFR Part 651.

The 30-day, public review period was initiated by placing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in the *Portland Tribune* and *The Oregonian*. The EA and draft FNSI were available at the Multnomah County Library - Hillsdale, 1525 SW Sunset Boulevard, Portland, Oregon 97239; Multnomah County Library – Capital Hill, 10723 SW Capital Highway, Portland, Oregon 97219; and on the BRAC website at [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm).

Date

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Thomas C.G. Helgeson  
Deputy Director, Public Works

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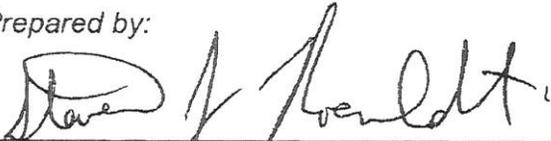
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CLOSURE, DISPOSAL, AND REUSE OF THE  
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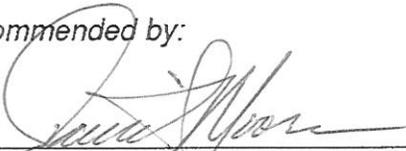
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# EXECUTIVE SUMMARY

## ES 1 INTRODUCTION

This environmental assessment (EA) analyzes the potential environmental impacts associated with the United States (US) Army's (Army) Proposed Action on the disposal and reuse of the Sergeant Jerome F. Sears (FAC ID OR010) US Army Reserve Center (Sears USARC) in Portland, Oregon. This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) (42 United States Code [USC] § 4321 et seq.); implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

## ES 2 PROPOSED ACTION

The Proposed Action is the BRAC Commission's Recommendation to:

**“Close Sears Hall United States Army Reserve Center in Portland, OR, close Sharff Hall United States Army Reserve Center in Portland, OR, and relocate units to a new Armed Forces Reserve Center on Camp Withycombe, OR. The new Armed Forces Reserve Center shall have the capability to accommodate Oregon National Guard units currently on Camp Withycombe and from the following Oregon Army Reserve National Guard Armories: Lake Oswego Armory, Maison Armory, and Jackson Band Armory, OR, if the state decides to relocate those National Guard units.”**

This Environmental Assessment (EA) addresses the potential environmental, cultural, and socioeconomic effects of the Sears USARC closure, disposal, and reuse. The potential effects of the relocation of the units stationed at the Sears USARC have been addressed in a separate National Environmental Policy Act (NEPA) analysis (CH2M Hill 2008).

The Sears USARC is located at 2731 SW Multnomah Boulevard in Portland, Oregon. This location has been owned by the US Government since February 20, 1959. This site consists of approximately 4 acres of developed land with four permanent structures:

- 24,104-square-foot administrative building (Sears Hall)
- 4,669-square-foot Organizational Maintenance Shop (OMS)
- 5,084-square-foot storage building
- Three-sided cinderblock hazardous materials (HAZMAT) structure

The administrative building and OMS buildings were constructed in 1960 and are concrete block and brick construction on a concrete slab. The storage building was constructed after 1994 and the HAZMAT storage structure was constructed in 1975. Sears Hall contains offices classrooms, storage rooms, a boiler room, and a drill hall. The building received renovations in 2002 with drill hall renovations in 2004. The OMS building is a single story with three vehicle service bays. The OMS historically

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contained offices, a photo-developing room, a battery room, and a paint room. The single story storage building is constructed of corrugated metal with a sloped corrugated metal roof. A three-sided cinder block constructed HAZMAT storage structure is located east of the OMS building. A smaller metal HAZMAT storage shed is located adjacent to the three-sided structure. A military equipment parking area is located east of the OMS building and a privately-owned vehicle parking area is located east of the administration building. The remaining land is covered by grass, shrubs, and trees. The site is surrounded by a chain link security fence. The site is currently occupied by the 364<sup>th</sup> Civil Affairs Brigade and the 320<sup>th</sup> Psyop Company. The Sears USARC property is owned by the 88<sup>th</sup> Regional Support Command.

## **ES 3 ALTERNATIVES**

### **ES 3.1 Alternative 1, No Action Alternative**

The No Action Alternative will be included as required by the Council on Environmental Quality (CEQ) regulations. The No Action Alternative would be to continue the missions at BRAC-affected installations as they were in April 2010. Because the law mandates closure and realignment of installations, this alternative would not be feasible. Nevertheless, it serves as a baseline alternative against which to compare the other alternatives.

### **ES 3.2 Alternative 2, Caretaker Status**

Under Alternative 2, the USAR would secure the property after the military mission has ended, to ensure public safety and the security of remaining government property and the consideration of any required environmental remediation actions. From the time of operational closure until conveyance of the property, the USAR would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. If the property were not transferred within an agreed-to period of time, under this alternative, the Army would reduce maintenance levels to the minimum level for surplus government property.

### **ES 3.3 Alternative 3, Demolition of Buildings and Construction of Housing Units (Preferred Alternative)**

Under Alternative 3, the Army would transfer the Sears USARC to the City of Portland for residential reuse through the negotiated sale of the property to the City of Portland. It is anticipated that the residential reuse will follow the US Department of Housing and Urban Development (HUD) "Housing First Model," which requires that one-fourth of the units be dedicated to the homeless with direct services. The conceptual reuse plan for the site includes demolition of the existing Sears USARC buildings and construction of mixed multifamily units, single family townhomes, a support center, and open space. The anticipated cost of land acquisition and construction is estimated to be approximately \$12 to \$14 million.

## **ES 4 ENVIRONMENTAL CONSEQUENCES**

The EA analyzed 12 resource areas for each alternative: land use, aesthetics and visual resources, air quality, noise, geology and soil, water resources, biological

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resources, cultural resources, socioeconomics, transportation, utilities, and hazardous and toxic substances. The analyses in the EA concluded that there would be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or alternatives because adverse effects to cultural resources will be resolved through implementation of an appropriate mitigation measure specified in the Memorandum of Agreement (MOA). Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted, and preparation of an Environmental Impact Statement (EIS) is not required.

## **ES 5 MITIGATION SUMMARY**

No significant adverse or significant beneficial impacts were identified or are anticipated as a result of implementing any of the Proposed Action alternatives or the No Action Alternative. An adverse *effect* to cultural resources was identified as a result of implementing Alternative 3 but because the adverse effect will be resolved through mitigation it will not result in a significant adverse *impact*, as discussed in Section 4.9.2. The MOA contains stipulations for a proposed offsite, or substitute, mitigation that will preserve and protect the historic character of another USARC in Oregon of similar age, design, and construction as the Sears USARC and that will remain on the USAR inventory through the development of a Historic Building Management Plan.

As a result, only one mitigation measure is required as part of this EA to reduce an adverse effect to a non-significant impact level.

## **ES 6 CONCLUSIONS**

As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the each of the Implementation Alternatives and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a FNSI is warranted, and preparation of an EIS is not required. Table ES.1 provides a summary of the impacts identified in this analysis.

Therefore, any of the alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC Act (Public Laws 101-510 and 107-107); consequently, it has not been selected for implementation.

Alternative 3 is the preferred alternative of the Army and the Local Redevelopment Authority. This alternative will allow future development in support of the need of affordable housing in the City of Portland and the Southwest Community Plan.

Table ES.1 Impact Summary <sup>1</sup>							
RESOURCE AREA	NO ACTION	Alternative 2			Alternative 3		
		Direct	Indirect	Cumulative	Direct	Indirect	Cumulative
Land Use					□		
Aesthetic and Visual Resources		●		●	○, □		○, □
Air Quality		□			○		○
Noise					●, □		●
Geology and Soil					●, ■	□	●
Water Resources					○, ■	○, ●, □	●
Biological Resources		□			○, □	○, ■	○
Cultural Resources					●		
Socioeconomics		○	●		□, ■	□, ■	□
Transportation		○, □			●, ●		○
Utilities		□					
Hazardous and Toxic Substances		□			■, ○		

□ Beneficial Effect (Negligible)      ○ Adverse Effect (Negligible)  
 ■ Beneficial Effect (Minor)          ● Adverse Effect (Minor)  
 ■ Beneficial Effect (Moderate)      ● Adverse Effect (Moderate)  
 ◆ Beneficial Effect (Significant)    ◇ Adverse Effect (Significant)

<sup>1</sup>A blank cell indicates no impact.

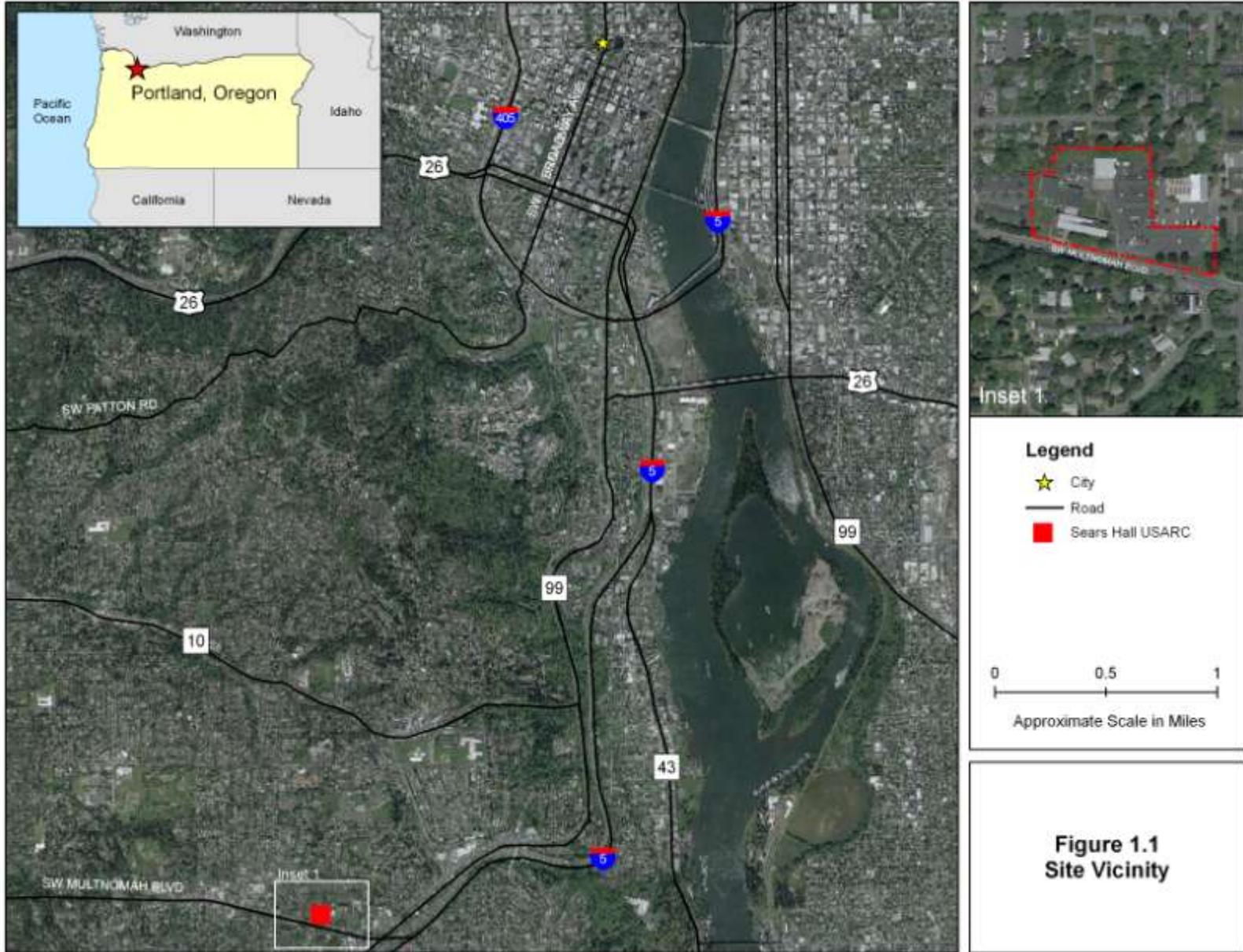
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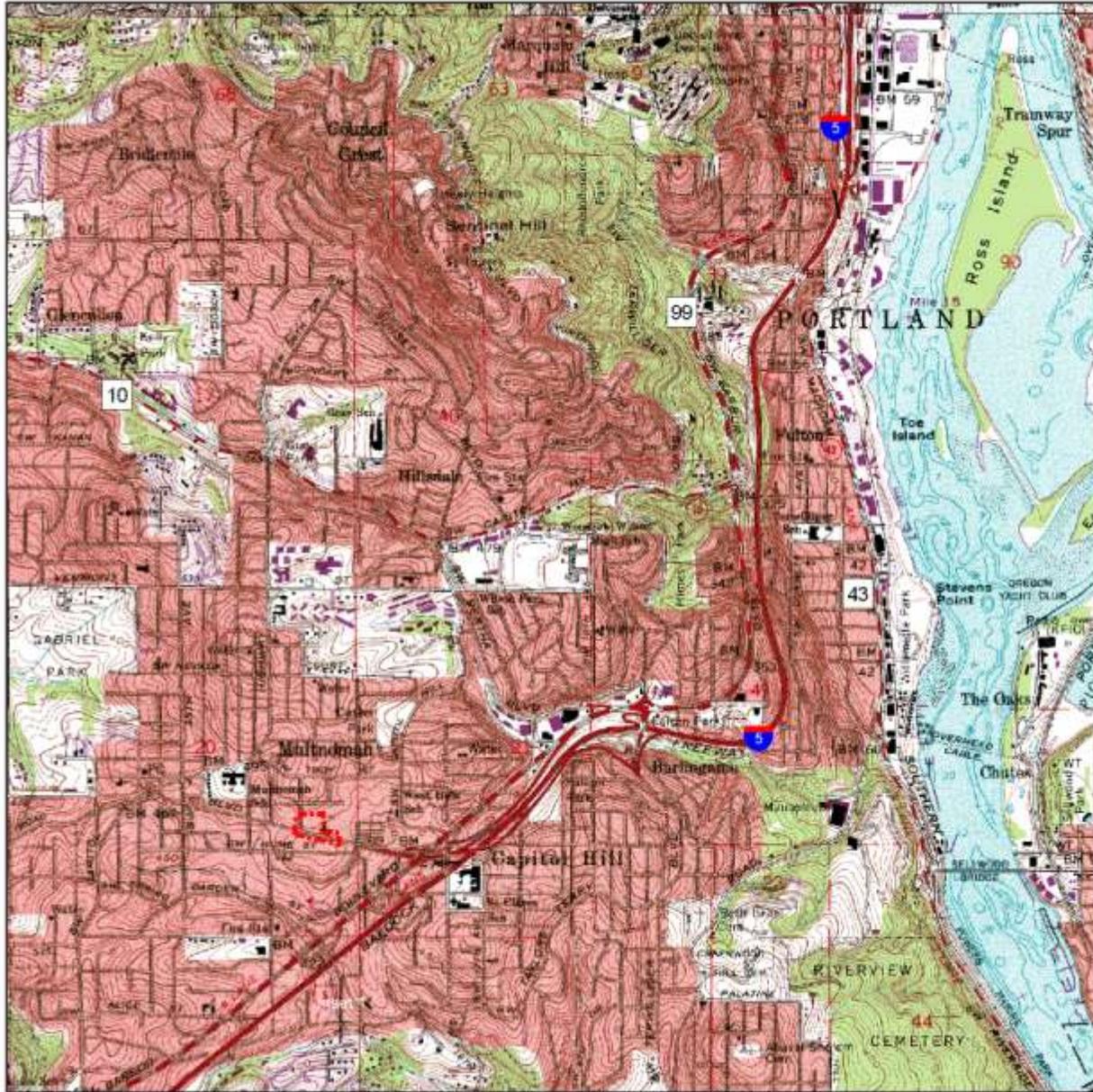
## SECTION 1.0 INTRODUCTION

This environmental assessment (EA) analyzes the potential environmental impacts associated with the United States (US) Army's (Army) Proposed Action on the disposal and reuse of the Sergeant Jerome F. Sears (FAC ID OR010) US Army Reserve Center (Sears USARC) in Portland, Oregon. Figures 1.1 and 1.2 show the location of the Sears USARC in Portland, Oregon and Figure 1.3 shows the site layout on an aerial photograph. This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) (42 United States Code [USC] § 4321 et seq.); implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

### 1.1 PURPOSE AND NEED

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the Sears USARC and realignment of essential missions to other installations. The deactivated USARC property is excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. Pursuant to NEPA and its implementing regulations, the Army has prepared this environmental assessment to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.





**Legend**

 Installation Boundary

0 1,350 2,700  
 Approximate Scale in Feet

Topo Graphic Map:  
 1:24,000 - Lake Oswego Quadrangle  
 USGS Scan of 1961 paper map.  
 \*Revisions shown in purple are  
 USGS edits completed in 1984.

**Figure 1.2**  
**Sears USARC**  
**Topographic Map**



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## 1.2 PUBLIC INVOLVEMENT

The Army is committed to open decision-making. The collaborative involvement of other agencies, organizations, and individuals in the NEPA process enhances issue identification and problem solving. In preparing this EA, the Army consulted with the State Historic Preservation Officer, US Fish and Wildlife Service (USFWS), Native American Tribes, federal, state, and local regulatory agencies, state and local governments, and others as appropriate.

The Army will begin a 30-day, public-review period by placing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in a local newspaper, the *Portland Tribune*, and a regional newspaper, *The Oregonian*. The EA and draft FNSI will be available at the Multnomah County Library - Hillsdale, 1525 SW Sunset Boulevard, Portland, Oregon 97239, Multnomah County Library – Capital Hill, 10723 SW Capital Highway, Portland, Oregon 97219, and on the BRAC website at [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm). The Army will invite the public and all interested and affected parties to review and comment on this EA and the draft FNSI. Comments and requests for information should be submitted to the Environmental Coordinator of the 88<sup>th</sup> Regional Support Command (RSC): Ms. Meline Skeldon (BRAC Environmental Coordinator) at 4570 Texas Way West, ATTN: Skeldon/Harvey Hall, Seattle, WA, 98199 or [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

At the end of the 30-day public review period, the Army will review all comments received, compare environmental impacts associated with reasonable alternatives, revise the FNSI (if necessary), and make a decision. If the impacts of the proposed action are not significant, the Army will execute the FNSI and the action can proceed immediately. If potential impacts are found to be significant, the Army will either commit to mitigation to reduce the anticipated impact to a less significant level, or will publish a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) in the Federal Register.

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## SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is the BRAC Commission's Recommendation to

***“BRAC Recommendation. Close Sears Hall United States Army Reserve Center in Portland, OR, close Sharff Hall United States Army Reserve Center in Portland, OR, and relocate units to a new Armed Forces Reserve Center on Camp Withycombe, OR. The new Armed Forces Reserve Center shall have the capability to accommodate Oregon National Guard units currently on Camp Withycombe and from the following Oregon Army Reserve National Guard Armories: Lake Oswego Armory, Maison Armory, and Jackson Band Armory, OR, if the state decides to relocate those National Guard units.”***

The Sears USARC is located at 2731 SW Multnomah Boulevard in Portland, Oregon. This location has been owned by the US Government since February 20, 1959. This site consists of approximately 4 acres of developed land with four permanent structures:

- 24,104-square-foot administrative building (Sears Hall)
- 4,669-square-foot Organizational Maintenance Shop (OMS)
- 5,084-squarefoot storage building
- Three-sided cinderblock hazardous materials structure

Figure 1.3 shows the Sears USARC site layout. The administrative building and OMS buildings were constructed in 1960 and are concrete block and brick construction on a concrete slab. The storage building was constructed after 1994 and the hazardous material (HAZMAT) storage structure was constructed in 1975. Sears Hall contains offices classrooms, storage rooms, a boiler room, and a drill hall. The building received renovations in 2002 with drill hall renovations in 2004. The southern portion of the building is two-stories and contains the offices. The northern portion of the building is one story and consists of the drill hall (US Army Corps of Engineers [USACE] 2007).

The OMS building is a single story with three vehicle service bays. The OMS historically contained offices, a photo-developing room, a battery room, and a paint room. The single story storage building is constructed of corrugated metal with a sloped corrugated metal roof. A three-sided cinder block constructed HAZMAT storage structure is located east of the OMS building. A smaller metal HAZMAT storage shed is located adjacent to the three-sided structure. A military equipment parking area is located east of the OMS building and a privately owned vehicle parking area is located east of the administration building. The remaining land is covered by grass, shrubs, and trees. The site is surrounded by a chain link security fence. The site is currently occupied by the 364<sup>th</sup> Civil Affairs Brigade and the 320<sup>th</sup> Psyop Company (USACE 2007). The Sears USARC property is owned by the 88<sup>th</sup> RSC.

BRAC legislation and process allow the Army to dispose of property no longer required to support Army missions. The Army proposes to dispose of the Sears USARC as a single parcel for public benefit conveyance. The local community has formed a Local

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Redevelopment Authority (LRA) and developed a plan for reuse of the property. The LRA process for evaluating reuse of the Sears USARC is discussed in the following sections. The LRA's recommended reuse is discussed in Section 3.3.

## **2.1 ARMY CLOSURE**

Under the BRAC Act, the Army must initiate all closure and realignments not later than September 15, 2007 and complete all closure and realignments not later than September 15, 2011. USAR began the processes involved with implementing closure by evaluating site environmental conditions and evaluating a proposed action scheduled to be implemented by the closure date required under the BRAC Act.

After the Sears USARC is closed in 2011, the Army will dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose

## **2.2 ARMY DISPOSAL AND LOCAL REUSE**

The USAR proposes to dispose of the Sears USARC as a single parcel for mixed-use affordable housing. In September 2006, the City of Portland designated the Portland Development Commission and the Bureau of Housing and Community Development as the Local Redevelopment Authority (LRA).

From September 2007 to April 2007, the LRA conducted public outreach and other planning tasks associated with the development of a reuse plan. The Sgt. Jerome Sears Reuse Master Plan was approved by the Portland City Council on June 12, 2008. The LRA selected Matrix Design Group, Inc. to assist in the preparation of the reuse master plan. This reuse master plan established a vision for redevelopment, designated a land use preference, and described the potential land use transfer mechanisms available. Following a review of the property reuse options available to them, the LRA along with the Portland City Council, voted to recommend the mixed-use affordable housing reuse (residential reuse) as the reuse plan for the Sears USARC (PDC 2008).

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## **SECTION 3.0 ALTERNATIVES**

A basic principle of NEPA is that an agency should consider reasonable alternatives to a proposed action. Considering alternatives helps to avoid unnecessary impacts and allows analysis of reasonable ways to achieve the stated purpose. To warrant detailed evaluation, an alternative must be reasonable. To be considered reasonable, an alternative must be ready for decision making (any necessary preceding events having taken place), affordable, capable of implementation, and satisfactory with respect to meeting the purpose of and need for the action. For the programmed closure of the Sears USARC, the following alternatives described in the 2006 Army BRAC NEPA Guidelines are analyzed in this EA.

### **3.1 NO ACTION ALTERNATIVE**

Inclusion of the No Action Alternative is prescribed by CEQ regulations and serves as a benchmark against which federal actions can be evaluated. The No Action Alternative would continue the mission at the Sears USARC as it was being performed in April 2010. The No Action Alternative is not feasible because the law mandates closure and realignment of the installation. There is no legal “no action” alternative; therefore, the No Action Alternative will be used as a baseline for the Proposed Action of this EA.

### **3.2 CARETAKER STATUS ALTERNATIVE**

The USAR would secure the property after the military mission has ended, to ensure public safety and the security of remaining government property and the consideration of any required environmental remediation actions. Under the BRAC Act, the USAR must initiate closure of installations within two years after the President submits the BRAC report to Congress. Because of environmental investigation and other requirements, there may be a period between the military presence and the transfer of the property. This condition should not be a permanent one because USAR policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the USAR would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. If the property were not transferred within an agreed-to period of time, under this alternative, the USAR would reduce maintenance levels to the minimum level for surplus government property required by 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation (AR) 420-70 (Buildings and Structures).

### **3.3 DEMOLITION OF BUILDINGS AND CONSTRUCTION OF HOUSING UNITS (PREFERRED ALTERNATIVE)**

The Army has established a unique process for performing NEPA analysis and documentation of potential impacts associated with Army property disposal and reuse. The process is designed to comply with NEPA and related laws, protect, and enhance the affected environments, and respond to local communities’ needs and wishes in keeping with Army objectives for assisting in rapid economic revitalization. The Army’s approach is to identify the primary and secondary actions associated with BRAC. The

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primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred.

The reuse plan presented by the LRA, and as adopted by the Portland City Council and the Bureau of Housing and Community Development, consists of mixed-use affordable housing. This reuse would occur through the negotiated sale of the property to the City of Portland. It is anticipated that residential reuse will follow the US Department of Housing and Urban Development (HUD) "Housing First Model," which requires that one-fourth of the units be dedicated to the homeless with direct services. The conceptual reuse plan for the site includes demolition of the existing Sears USARC buildings and the construction of mixed multifamily units, single-family townhomes, a support center, and open space. Figure 3.1 illustrates the proposed conceptual reuse of the Sears site. The anticipated cost of land acquisition and construction is estimated to be approximately \$12 to \$14 million.

### **3.4 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER ANALYSIS**

The LRA screened this Federal Government surplus property by soliciting NOIs from state and local governments, representatives of the homeless, and other interested parties, as required by the Federal Property Administrative Services Act of 1949, the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, and Redevelopment and Homeless Assistance Act of 1994.

As documented in the Reuse Master Plan, the LRA received NOIs for Public Benefit Conveyance (PBC) consideration from various organizations regarding the Sears USARC property. These reuses were considered by the LRA and ultimately not selected for implementation by the LRA. These include the following:

- Office Industrial Reuse. An NOI was received from the Portland Office of Transportation, Portland Water Bureau, and the Portland Office of Emergency Management to use the property as a maintenance and emergency response facility for the city. Factors leading to the LRA not selecting the Office Industrial Reuse alternative included the uncertainty of qualifying for a PBC, adverse influence on local property values, incompatible zoning, and potential traffic concerns.
- Community/Educational Reuse. NOIs received from the Portland Community College and Westside Christian High School support this option. This type of reuse could range from community-based programs and uses for early childhood and elementary education, after-school programs, religious education, cultural activities, and adult/continuing education programs. Factors leading to the LRA not selecting the Community/Educational Reuse alternative included traffic concerns, and zoning incompatibility.

Since these alternatives were not selected by the LRA as their official reuse plan, they were not carried forward for further analysis in this EA.



Site Plan Prepared by:



Carleton Hart Architecture

Figure 3.1

Sears USARC  
Conceptual Reuse Plan

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## SECTION 4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

### 4.1 INTRODUCTION

This section describes the existing environment and analyzes the significance of direct, indirect, and cumulative effects of the proposed action and alternatives on the environment.

#### 4.1.1 Definition of Key Terms

##### 4.1.1.1 Environmental Baseline

The existing environmental baseline conditions have been established based on conditions at the Sears USARC as of April 2010.

##### 4.1.1.2 Impact

An environmental consequence or impact (referred to in this document as an impact) is defined as a noticeable change in a resource from the existing environmental baseline conditions caused by or resulting from the proposed action. The terms “impact” and “effect” are synonymous as used in this EA. Impacts may be determined to be beneficial or adverse and may apply to the full range of natural, aesthetic, cultural, and economic resources of the installation and its surrounding environment.

##### 4.1.1.3 Direct Versus Indirect Impacts

Where applicable, analysis of impacts associated with each course of action has been further divided into direct and indirect impacts. Definitions and examples of direct and indirect impacts as used in this document are as follows:

- **Direct Impacts.** Direct impacts are caused by the action and occur at the same time and place. Both short-term and long-term direct impacts can be applicable.
- **Indirect Impacts.** Indirect impacts are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.
- **Application of Direct Versus Indirect Impacts.** For direct impacts to occur, a resource must be present in a particular area. For example, if highly erodible soil were disturbed due to construction, there would be a direct impact to soil from erosion at the development site. Sediment-laden runoff might indirectly affect surface water quality in adjacent areas downstream from the development site.

##### 4.1.1.4 Impact Characterization

Impacts include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Impacts may also include those resulting from actions which may have both beneficial and

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detrimental effects, even if on balance the agency believes that the effect will be beneficial. The relative magnitude of an impact is characterized. Impacts that are significant are the highest level of impacts. Conversely, negligible adverse or beneficial impacts are the lowest level of impacts.

#### **4.1.1.5 Significance**

The term “significant,” as defined in Section 1508.27 of the Regulations for Implementing NEPA (40 CFR 1500), <http://ceq.hss.doe.gov/nepa/regs/ceq/1508.htm#1508.27>, requires consideration of both the context and intensity of the impact evaluated.

**Context.** Significance can vary in relation to the context of the action. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short-term and long-term effects may be relevant.

**Intensity.** In accordance with the CEQ implementing guidance, impacts are also evaluated in terms of their intensity or severity. Factors contributing to the evaluation of the intensity of an impact are listed in Section 1508.27 of the Regulations for Implementing NEPA.

As noted in the following analysis, none of the potential impacts identified in this EA are significant at this time.

## **4.2 LAND USE**

### **4.2.1 Affected Environment**

#### **4.2.1.1 Regional Geographic Setting and Location**

The Sears USARC is located in the west-northwest portion of Multnomah County, Oregon, within the city limits of Portland (Figure 1.1). The site is located in a primarily residential area with some commercial businesses situated southeast of SW Multnomah Boulevard. This site has been owned by the US Government since February 20, 1959.

#### **4.2.1.2 Installation Land/Airspace Use**

The Sears USARC site is zoned R1 – Residential by the City of Portland. It consists of approximately 4 acres of developed land with four permanent structures:

- 24,104-square-foot Sears Hall
- 4,669-square-foot OMS
- 5,084-SF storage building
- Three-sided cinderblock hazardous materials (HAZMAT) structure

The USARC is used for administrative services, classroom training, and light vehicle maintenance. The facility is composed of three major land cover types (Table 4.1).

<b>Land Cover and Ecological Communities</b>	<b>Calculated Area (Acres)</b>	<b>Percent of Facility</b>
Buildings	0.61	15
Maintained Grass	1.33	32
Paved Road/Parking	2.21	53
<b>Total</b>	<b>4.15</b>	<b>100</b>

Source: BHE Environmental, Inc., 2009

#### **4.2.1.3 Surrounding Land/Airspace Use**

The general nature of the area surrounding the Sears USARC is residential with some small commercial businesses situated to the southeast beyond SW Multnomah Boulevard. Residential properties adjoin the Sears USARC to the north and west. A commercial building currently occupied by Qwest Telecommunications, adjoins the site to the east. SW Multnomah Boulevard adjoins the site to the south, followed by residential homes. Small commercial buildings farther southeast of the site along SW Multnomah Boulevard are currently occupied by a woodworking business and small law and medical practices that occupy buildings that appear to be converted residences. Table 4.2 provides a list of adjacent properties with their directional location with regard to the USARC.

<b>Direction From Site</b>	<b>Name/Type of Property</b>	<b>Address</b>	<b>Zoning</b>
North	Residential	Various addresses	R7 – Residential
South	Residential, custom woodworking shop, attorney and medical related offices	Various addresses	R7 – Residential CG – Commercial/ Residential
East	Qwest Telecommunication	8033 25th Avenue	R1 – Residential
West	Woodmont duplex	Various addresses	R1 – Residential

Source: USACE 2007

#### **4.2.1.4 State Coastal Management Program**

According to information reviewed online at the Oregon Coastal Management Program’s website (OCMP 2010), the Sears USARC does not lie within a coastal zone management area.

#### **4.2.1.5 Current and Future Development in the Region of Influence**

The area of the City of Portland *Southwest Community Plan* (SWCP) encompasses approximately 19.5 square miles, generally bordered on the north by the Sunset

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Highway/I-405, on the east by the Willamette River, on the south by the Multnomah/Clackamas County line, and on the west by the Multnomah/Washington County line (City of Portland 2000).

The SWCP policies were adopted by the Portland City Council in July 2000. They went into effect on December 21, 2001, along with accompanying objectives and the Southwest Community Plan Comprehensive Plan/Zoning Map. The Comprehensive Plan/Zoning Map must be consistent with these policies and other relevant city, Metro and state policies and regulations.

The Land Use and Urban Form policy is the first policy in the SWCP document. This is an umbrella policy under which all others fit. The policy states the following (City of Portland 2000):

“Enhance Southwest Portland’s sense of place as a community and a collection of distinct neighborhoods. Accommodate Southwest Portland’s share of regional growth while protecting the environment in all areas. Encourage the realization of compact, transit and pedestrian-friendly, mixed use centers while responding to the need for a range of housing types and prices. Outside of the mixed-use areas, allow infill housing opportunities which increase neighborhood diversity, stability, and home ownership while limiting redevelopment.”

The Housing Policy of the SWCP (City of Portland 2000) states the following:

“Provide a variety of affordable housing choices adequate to meet the needs of current and future Southwest residents. Regard the existing housing stock as one resource to meet this need. Encourage development of housing types that will increase home ownership opportunities for Southwest residents.”

## **4.2.2 Consequences**

### **4.2.2.1 Alternative 1 – No Action Alternative**

**Direct Impacts.** No changes to the existing baseline conditions of land use are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no direct impacts to land use are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions of land use are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no indirect impacts to land use are anticipated.

### **4.2.2.2 Alternative 2 – Caretaker Status Alternative**

**Direct Impacts.** No direct impacts on land use are anticipated as maintenance activities are expected to continue for the current facilities. There would be no changes to land use under this alternative.

**Indirect Impacts.** No indirect impacts on land use are anticipated as maintenance activities are expected to continue for the current facilities. There would be no changes to land use under this alternative.

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#### 4.2.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

**Direct Impacts.** The proposed reuse for the buildings and real estate under this scenario would be residential reuse. The proposed project area consists of lands previously disturbed or already containing development, including buildings and parking lots. The proposed developments would be similar to and would not conflict with adjacent land uses (residential and commercial/residential). A negligible long-term beneficial impact to land use is expected under this alternative because it would utilize the current residential zoning designation to provide multi-family attached rental apartments, owner-occupied condominiums, or mixed use affordable housing, which would comply with the SWCP (City of Portland 2000).

**Indirect Impacts.** No indirect impacts to land use are expected under this alternative because there would be no changes in the current residential zoning designation surrounding the multi-family attached rental apartments, owner-occupied condominiums, or mixed use affordable housing (City of Portland 2000).

### 4.3 AESTHETICS AND VISUAL RESOURCES

#### 4.3.1 Affected Environment

The Sears USARC site has four permanent buildings. All buildings are one story with the exception of the administrative building. The northern portion of the administrative building is one-story and the southern portion, with frontage on SW Multnomah Boulevard, is two-story. The Sears Hall administration building is an asymmetrical T. The main two-story block forms the top portion of the T and has a shallow pitched gable roof with parapet walls on the side (east and west) elevations; the main (south) elevation faces the street. The administration building and OMS buildings are cement block construction covered by brick veneer and were built on a concrete slab. The architecture of the main administration building and OMS are consistent with the design of other Army Reserve Centers constructed as part of a nationwide building campaign in the early Cold War and are influenced by the 1950s contemporary movement (Moore et al. 2008). For additional information on architectural resources at the Sears USARC, see Section 4.9.1.2. The storage building is constructed of corrugated metal with a sloped corrugated metal roof. A three-sided cinder block constructed HAZMAT storage structure is located to the east of the OMS building. Approximately 90 percent of the property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is maintained grass (predominantly along the northern and western perimeters of the property and around the front of the administration building). A chain link fence follows the perimeter of the property, except for the street frontage.

The view from the Sears USARC is dominated by a residential and commercial landscape. The dominant view to the south is SW Multnomah Boulevard with a commercial uses fronting on the street and a thickly vegetated hill with residential areas beyond. Residential and commercial areas abut the Sears USARC site to the north, west, and east (Figure 1.3).

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## 4.3.2 Consequences

### 4.3.2.1 Alternative 1 – No Action Alternative

**Direct Impacts.** No changes to the existing baseline conditions of aesthetics and visual resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions of aesthetics and visual resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no indirect impacts to these resources are anticipated.

### 4.3.2.2 Alternative 2 – Caretaker Status Alternative

**Direct Impacts.** There would be minor adverse short-term direct impacts under this alternative. Although the caretaker would insure public safety and security of the remaining government property, caretaker status creates potential for a decrease in the frequency of mowing, weeding, and visual maintenance.

**Indirect Impacts.** There would be no indirect impacts under this alternative as the caretaker status of the USARC would not affect the aesthetics and visual resources of adjacent properties.

### 4.3.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

**Direct Impacts.** There would be direct, negligible, short-term adverse impacts to aesthetic and visual resources under Alternative 3. During demolition of the existing building and construction of the proposed facilities there would be adverse impacts from construction equipment and activities.

There would be long-term negligible beneficial impact to visual and aesthetic resources. The proposed use would be constructed within an area currently developed with an array of commercial and residential structures. The proposed reuse plan includes demolition of the buildings and construction of 110 mixed-use housing units, a community facility, parking spaces, sidewalks and driveways, and an outdoor recreational area. Green roofs would be incorporated into the housing units. Based on conceptual plans, the overall percentage of impervious surface could decrease by up to 15 percent.

**Indirect Impacts.** No indirect impacts to aesthetics and visual resources would be expected under Alternative 3 as this action would not cause a change in the visual or aesthetic resources in surrounding properties. Construction impacts would be short-term and confined to the Sears USARC; therefore, no indirect impacts are expected.

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## **4.4 AIR QUALITY**

### **4.4.1 Affected Environment**

#### **4.4.1.1 Ambient Air Quality Conditions**

The status of the air quality in a given area is determined by the concentrations of various pollutants in the atmosphere. The Federal Clean Air Act (CAA) (42 USC 7401-7671q) required the USEPA to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality throughout the United States.

Individual states can adopt the NAAQS or establish state ambient air quality standards, which may not be less stringent than the NAAQS. The Oregon Department of Environmental Quality (ODEQ) has adopted the NAAQS.

The primary NAAQS are intended to protect public health, while the secondary NAAQS are intended to protect the environment (e.g., crops, wildlife, buildings). Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in “attainment” for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a “non-attainment” area for that pollutant. Non-attainment areas are under strict regulatory restriction in an effort to lower pollutant concentrations to regulatory standards. Three of the criteria pollutants (ozone, carbon monoxide, and PM<sub>10</sub>), are classified according to severity.

The USEPA requires each state to prepare a State Implementation Plan (SIP) to ensure these goals are met. A SIP is a compilation of goals, strategies, source emission limitations and control requirements, schedules, and enforcement actions that would lead the state to compliance with all NAAQS. The SIP includes measures to maintain air quality standards in maintenance areas.

#### **4.4.1.2 Air Pollutant Emissions at Installation**

The 364<sup>th</sup> Civil Affairs Brigade and 320<sup>th</sup> Psyop Company are currently stationed at the Sears USARC. The USARC is located within an Air Quality Region that was designated as a moderate maintenance area in October 1997 for the 8-hour ozone standard for ambient air quality. Emission sources at the current site include stationary, mobile, and fugitive categorizations. Potential stationary sources include a boiler in the administrative building.

#### **4.4.1.3 Regional Air Pollutant Emissions Summary**

A General Conformity Analysis, in accordance with 40 CFR Part 93 Subpart B, is required prior to this project being initiated. A General Conformity Determination is not required due to the activity being exempt under 40 CFR 93.153 (c) (1) and (2) (x). Additionally, calculations from associated activities demonstrate air emission levels well below applicable threshold levels. Appendix B contains the Record of Non-Applicability (RONA) and discusses the conformity process.

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## 4.4.2 Consequences

### 4.4.2.1 Alternative 1 – No Action Alternative

**Direct Impacts.** No changes to the existing baseline conditions for air quality resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions for air quality resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

### 4.4.2.2 Alternative 2 – Caretaker Status Alternative

**Direct Impacts.** There would be negligible beneficial impacts under Alternative 2. Under this alternative, the Army would provide for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of property. Currently, the site has approximately 21 full time staff at the center on a daily basis with an additional 185 soldiers on drill weekends (once a month). Following closure, there would be a reduction of mobile emissions from government and privately owned vehicles. The only on-site vehicles would be those there for minimal maintenance activities. During the implementation of the caretaker status, there would be negligible emissions from the vehicles and equipment needed to perform maintenance activities on-site.

During the implementation of the caretaker status there would be a reduction in air emissions associated with the operation of the natural gas boiler. While undergoing the caretaker status the existing buildings would not require heating and cooling for human comfort; consequently emissions associated with these activities would be reduced.

**Indirect Impacts.** There are no anticipated indirect impacts under this alternative because following the closure and during implementation of the caretaker status there would be a net decrease in emissions since there would be no operations occurring at the site.

### 4.4.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

**Direct Impacts.** Negligible direct adverse impacts would be expected under Alternative 3. The proposed action is located in Multnomah County, Oregon, designated as a moderate maintenance area for ozone. As such, ozone precursor pollutants nitrogen oxides and VOCs, would apply for a General Conformity Analysis. Multnomah County is in attainment for all other NAAQS criteria pollutants. The primary emission sources for this project will be those associated with demolition and construction activities, with demolition being the predominant emission-generating activity. Cumulative air emissions were calculated for various types of diesel engine construction vehicles and related equipment. The construction activity associated with this modification will be a temporary negligible increase in air emissions as demonstrated in the calculations shown in Appendix B.

Currently, the USARC has 21 employee vehicles on site on a daily basis and additional vehicles for 185 soldiers on drill weekends one weekend a month. The proposed reuse of a mixed-use affordable housing would potentially add more regular vehicle emissions

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from patrons utilizing the site on evenings and weekends. The increased mobile emissions associated with this modification will be a negligible increase in air emissions as demonstrated in the calculations shown in Appendix B.

**Indirect Impacts.** No indirect impacts to air quality would be expected under Alternative 3 as on-site emissions are directly related to the addition of vehicle emissions and construction related activities. No additional impacts are expected beyond the direct impacts noted above.

## 4.5 NOISE

### 4.5.1 Affected Environment

To account for fluctuations in noise levels across installations, USEPA defined a long-term average noise descriptor, the “equivalent” noise level, or  $L_{eq}$ . Finding that the  $L_{eq}$  did not adequately account for individuals’ increased sensitivity to sound at night, USEPA defined the Day-Night Average Sound Level (DNL), which consists of the equivalent noise level ( $L_{eq}$ ) with a 10-dB penalty for nighttime noise. The DNL is the accepted noise descriptor for assessing community noise impacts.

The Army recognizes three noise impact zones for its installations, the definitions of which are based on A-weighted noise levels (dBA) for transportation and small-arms noise, and C-weighted noise levels (dBC) for blast noise. dBA is used interchangeably with the term A-weighted day-night level (ADNL) and dBC is used interchangeably with the term C-weighted day-night level (CDNL). These Noise Zones are as follows:

- Zone III (Unacceptable [for noise-sensitive activities]) is the area where the DNL is greater than 75 dBA for aircraft, vehicle, and small arms range noise, and greater than 70 dBC for noise from weapon systems larger than 20 millimeter. This zone is considered an area of severe noise exposure and is unacceptable for noise-sensitive activities.
- Zone II (Normally Unacceptable [for noise-sensitive activities]) is the area where the DNL is between 65 and 75 dBA or between 62 and 70 dBC. This area is considered to have a significant noise exposure and is, therefore, normally only acceptable for activities such as industrial, manufacturing, transportation, and resource production. However, if the community determines that these land areas must be used for residential purposes, then noise level reduction features should be incorporated into the design and construction of the buildings.
- Zone I (Acceptable [for noise-sensitive activities]) is the area where the DNL is less than 65 dBA or less than 62 dBC. This area, considered to have moderate to minimal noise exposure from aircraft operations, weapons firing and other noise sources, is acceptable for noise-sensitive land uses including housing, schools, and medical facilities.

Currently, the major sources of noise at the Sears USARC are automobiles and trucks. Noise levels attributed to the property comply with Zone I as listed above and do not have adverse impacts on adjacent residential and commercial areas. Surrounding noise is generated by residential and commercial activities. Vehicle noise can be attributed to SW Multnomah Boulevard, a heavily used four-lane roadway, located

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adjacent to the southern property boundary of the Sears USARC. The nearest sensitive noise receptors are private residences adjacent to the north, west, and south of the Sears USARC. A commercial building is located to the east of the property. Numerous residences and small commercial businesses are located in the vicinity of the Sears USARC.

## **4.5.2 Consequences**

### **4.5.2.1 Alternative 1 – No Action Alternative**

**Direct Impacts.** No changes to the existing baseline conditions of noise are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no direct impacts to noise are anticipated. Current noise levels from vehicle operations would continue at existing baseline levels.

**Indirect Impacts.** No changes to the existing baseline conditions of noise are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no indirect impacts to noise are anticipated. Current noise levels from vehicle operations would continue at existing baseline levels.

### **4.5.2.2 Alternative 2 – Caretaker Status Alternative**

**Direct Impacts.** No direct impacts to noise would occur under this alternative. If the Army finds it necessary to place the Sears USARC in caretaker status for an indefinite period, the Army would assume safeguards against fire, theft, and damage from the elements. It is likely these caretaker activities would result in noise levels below current baseline levels. These reduced noise levels would occur throughout the period of caretaker status. Any maintenance activities required under caretaker status would be similar to activities currently taking place at the Sears USARC. Changes in noise levels under this alternative would be negligible.

**Indirect Impacts.** No indirect impacts due to noise are anticipated as compared to baseline conditions as changes in noise levels would be limited to on-site caretaker activities which would not occur at a later time or farther removed in distance.

### **4.5.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)**

**Direct Impacts.** Both minor short-term adverse and negligible long-term beneficial direct impacts would occur at the Sears USARC due to the change in noise levels associated with the reuse of the property. Minor short-term adverse direct impacts would be expected due to demolition of the current Sears USARC buildings and construction of mixed multifamily units, single-family townhomes, a support center, and open space. Construction noise, including construction vehicle and equipment noise, typically does not contribute substantially to long-term average noise levels but consists of frequent, highly intrusive sounds of 87 to 96 dBA (Suter 2002). To reduce impacts associated with noise levels, construction will be limited to daylight hours

Negligible long-term beneficial direct impacts would occur based on the future use of the Sears USARC property for private residences. Future vehicle use would consist primarily of privately owned vehicles. The elimination of military equipment use would result in a negligible decrease in noise at the site.

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**Indirect Impacts.** No indirect impacts are anticipated as no changes to surrounding properties are necessary to accommodate a change in noise levels. No additional impacts are expected beyond the direct impacts associated with construction and future vehicle use at the property.

## **4.6 GEOLOGY AND SOIL**

### **4.6.1 Affected Environment**

#### **4.6.1.1 Geologic and Topographic Conditions**

The Portland, Oregon area lies within the Willamette Valley or basin physiographic province between the Western Cascades and Oregon Coastal Range which is characterized by rolling to level plains of glacial drift (USACE 2007). Surficial geology of the area consists of fine-grained unconsolidated sediments that mantle the bedrock ranging in thickness from 0 to 100 feet. Bedrock geology consists of basalts of Miocene age (DOGAMI 1989).

The Sears USARC property is gently rolling with an elevation range of 460 to 490 feet above sea level. The property slopes gently southeast toward SW Multnomah Boulevard. There are no known geologic hazards or unique geologic features at the Sears USARC property.

#### **4.6.1.2 Soil**

The Natural Resource Conservation Service (NRCS) Web Soil Survey was used to evaluate the type of soil at the site (USDA 2010). The soil at the Sears USARC property is mapped as the Cascade-Urban land complex on 0 to 8 (86% of site) and 8 to 15 percent slopes (14% of site). Cascade soil is described as silt loams formed from loess, somewhat poorly drained with a depth to the water table of 18 to 30 inches. The soil is not hydric. The soil consists of 40 percent Urban land and has been disturbed by construction activities in the past. The soil is somewhat limited to support dwellings without basements due to the depth to saturated zone.

#### **4.6.1.3 Prime Farmland**

The Farmland Protection Policy Act (FPPA) directs federal agencies to identify and quantify adverse impacts of federal programs on farmlands. The purpose of the FPPA is to minimize the number of federal programs that contribute to the unnecessary and irreversible conversion of agricultural land to non-agricultural uses.

The NRCS uses a land evaluation and site assessment system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. The Sears USARC Property is located in an area committed to urban use and would not be available for farming in the future. Therefore, requirements of the FPPA do not apply (Raney 2010). No further coordination with the NRCS is required.

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## 4.6.2 Consequences

### 4.6.2.1 Alternative 1 – No Action Alternative

**Direct Impacts.** No changes to the existing baseline conditions of geology and soil are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions of geology and soil are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no indirect impacts to these resources are anticipated.

### 4.6.2.2 Alternative 2 – Caretaker Status Alternative

**Direct Impacts.** No direct impacts to geology or soil are anticipated under Alternative 2 because no construction or demolition will occur. Under this alternative, the Army would maintain the property as needed for reuse in an economical manner that facilitates redevelopment.

**Indirect Impacts.** No indirect impacts to geology or soil are anticipated under Alternative 2 because no construction or demolition will occur. Under this alternative, the Army would maintain the property as needed for reuse in an economical manner that facilitates redevelopment.

### 4.6.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

**Direct Impacts.** Minor direct short-term adverse and long-term beneficial impacts to soil would be expected. Minor short-term adverse impacts to soil would occur because of soil disturbance associated with demolition of existing structures and construction of new facilities. To reduce impacts of soil disturbance and compaction during and after construction, appropriate local best management practices (BMP) concerning sediment control would be applied. Such controls may include silt fences, hay bales, and seeding of cleared areas that are to remain exposed for long periods of time. Minor long-term beneficial impacts to soil would be expected as there would be a reduction in erosion due to the increase in the amount of vegetated surface on the property. Vegetative cover tends to slow down the movement of surface runoff and allows excess surface water to infiltrate rather than runoff. Currently, approximately 90 percent of the Sears USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings, incorporation of green roofs, and creation of an outdoor recreational area, it is reasonable to anticipate that there would be up to a 15 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped.

Construction and demolition activities under the proposed action would have no impact on topography as significant land contouring would be not required. Implementation of Alternative 3 would not involve any intrusive construction activity that would affect subsurface geological formations.

No impacts to farmland are anticipated as the proposed action will not convert any areas currently used for farming into another use.

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**Indirect Impacts.** Implementation of Alternative 3 would have a negligible long-term beneficial effect on soil resources downslope from the Sears USARC property as there would be a reduction in erosion due to the increase in the amount of vegetated surface on the USARC property. Vegetative cover tends to slow down the movement of surface runoff and allows excess surface water to infiltrate rather than runoff. Currently, approximately 90 percent of the Sears USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings, incorporation of green roofs, and creation of an outdoor recreational area, it is reasonable to anticipate that there would be up to a 15 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped.

## **4.7 WATER RESOURCES**

### **4.7.1 Affected Environment**

#### **4.7.1.1 Surface Water**

No surface water features are located in the immediate vicinity of the Sears USARC. The Willamette River, located approximately 1.75 mile east of the property, is the closest major surface water feature. The Willamette River is 187 miles long, has an average discharge of 32,970 cu ft/s and a basin of 29,728 km<sup>2</sup> (USGS 2009). The Willamette River joins the Columbia River, which ultimately discharges to the Pacific Ocean (USACE 2007). The Portland Harbor section of the Willamette River between downtown Portland and its terminus at the Columbia River is heavily polluted from years of industrial development of the river and its banks. State studies in the 1990s identified a wide variety of pollutants in the river bottom, including heavy metals, polychlorinated biphenyls (PCBs), and pesticides. As a result of these studies, this section of the river was designated a Superfund site in 2000 (ODEQ 2010).

There is no stormwater permit, spill prevention control and countermeasures plan (SPCCP), or stormwater pollution prevention plan (SWPPP) associated with the Sears USARC (Skeldon 2010). The Sears USARC utilizes one oil/water separator on the property. Nine exterior drains on the property feed into the oil/water separator and eventually discharge into the city storm sewer (USACE 2007).

#### **4.7.1.2 Hydrology/Groundwater**

Water drainage on the property is collected through a series of catch basins, pipes, and manholes to the east side of the Sears USACE property along SW 25<sup>th</sup> Avenue. The drainage then flowed south and into the City of Portland system along SW Multnomah Boulevard (USACE 2007).

Depth to groundwater was encountered at approximate 8 feet during UST closure activities. Information regarding direction of groundwater flow and underlying aquifers is not available within 1 mile of the Sears USARC. A search of federal and state water well databases identified 14 wells located within a 1 mile radius of the Sears USARC property. None of the wells are directly adjacent to the property. No information regarding the purpose of the wells is available in the EDR report, however, several of the wells appear to be monitoring wells, and one well is listed as abandoned. None of the wells that appear to be monitoring wells are within ½ mile of the USARC property.

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No information regarding contamination of the wells is presented in the state and federal databases presented in the EDR report. No public water supply wells are located within 1 mile of the USARC property. The City of Portland uses the Columbia River as its potable water source and not groundwater (USACE 2007).

#### **4.7.1.3 Floodplains**

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 4101830045D, the Sears USARC is not included in either the 100-year or the 500-year flood plain (FEMA 2010).

#### **4.7.1.4 Coastal Zone**

According to information reviewed on-line at the Oregon Coastal Management Program's website ([http://egov.oregon.gov/LCD/OCMP/CstZone\\_Intro.shtml](http://egov.oregon.gov/LCD/OCMP/CstZone_Intro.shtml)), the Sears USARC does not lie within a coastal zone management area.

### **4.7.2 Consequences**

#### **4.7.2.1 Alternative 1 – No Action Alternative**

**Direct Impacts.** No changes are anticipated to the existing baseline conditions of water resources. Because the Sears USARC would not close and personnel would not be realigned no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes are anticipated to the existing baseline conditions of water resources. Because the Sears USARC would not close and personnel would not be realigned no indirect impacts to these resources are anticipated.

#### **4.7.2.2 Alternative 2 – Caretaker Status Alternative**

**Direct Impacts.** No direct impacts to water resources are anticipated under Alternative 2. Although the Sears USARC would close and personnel would be realigned, there would be no changes to site conditions. No demolition or construction activities would occur.

**Indirect Impacts.** No indirect impacts to water resources are anticipated under Alternative 2. Although the Sears USARC would close and personnel would be realigned, there would be no changes to site conditions. No demolition or construction activities would occur.

#### **4.7.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)**

**Direct Impacts.** No short-term direct impacts to surface water are anticipated under Alternative 3 during demolition of the USARC buildings and construction of the mixed use affordable housing units. There are no surface water bodies, floodplains, or coastal zones on the property.

There would be negligible long-term adverse direct impacts to on-site groundwater quality from potential leaking or spilling of oil, gas, or antifreeze while vehicles are parked at the housing units.

Approximately 90 percent of the Sears USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings.

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With the demolition of buildings, incorporation of green roofs, and creation of an outdoor recreational area, it is reasonable to anticipate that there would be up to a 15 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped, and there would be minor beneficial long-term direct impacts to ground water recharge rates.

**Indirect Impacts.** Negligible short-term and minor long-term adverse impacts are anticipated to water resources under Alternative 3. Negligible long-term beneficial impacts are anticipated to water resources under Alternative 3.

Demolition of the USARC buildings and construction of the mixed use affordable housing units may cause a minor short-term increase sediment runoff and loading into off-site water bodies from activities such as grading, vegetative clearing, and excavating.

Current Oregon regulations require the proponents of any construction activity that disturbs one or more acres of land to file a National Pollutant Discharge Elimination System (NPDES) 1200-C permit application for the resulting storm water runoff caused by the construction activity including clearing, grading, and excavation operations. This includes having an Erosion and Sediment Control Plan (ESCP). A SWPPP is not required under this permit. The Proposed Action would incorporate construction contractor compliance with established permit requirements. Even with implementation of controls, short-term soil erosion is anticipated.

There would be negligible long-term adverse direct impacts to off-site groundwater quality from potential leaking or spilling of oil, gas, or antifreeze while vehicles are parked at the housing units.

Currently, approximately 90 percent of the Sears USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings, incorporation of green roofs, and creation of an outdoor recreational area, it is reasonable to anticipate that there would be up to a 15 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped. This would be a negligible, long-term beneficial impact as there would be a reduction in surface water runoff into downstream water bodies

## **4.8 BIOLOGICAL RESOURCES**

### **4.8.1 Affected Environment**

#### **4.8.1.1 Vegetation**

The maintained lawn of the Sears USARC is dominated by Kentucky bluegrass in the herbaceous layer, Pacific rhododendron in the shrub layer, and Norway maple in the canopy layer. The following non-dominant invasive-exotic species were documented in this community: orange eye butterfly bush, bull thistle, English ivy, and common St. Johnswort (BHE Environmental, Inc. 2009).

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#### 4.8.1.2 Wildlife

The Sears USARC offers minimal habitat for wildlife species. Given the developed nature of the facility and the surrounding land use, only common wildlife species typically adapted to developed areas are likely to utilize the facility.

Wildlife observed during a 2009 site survey included northwest crow, western scrub jay, and rock pigeon (BHE Environmental, Inc. 2009).

#### 4.8.1.3 Sensitive Species

Results of on-site surveys indicate that habitat for state or federally listed species is not present on the highly developed Sears USARC property.

Under Section 7 of the Endangered Species Act, this project qualifies for informal consultation with the USFWS. An initial coordination letter was sent to the USFWS to request information related to federally listed threatened or endangered plant or animal species within the project area. The USFWS replied stating, "Based on available information regarding listed threatened or endangered species under the Service's jurisdiction that may occur in Multnomah County, and knowledge of the site, [the USFWS] has no information that indicates listed or proposed species or their habitats are present" (Appendix A.3, USFWS 2010a). This correspondence concludes informal consultation with the USFWS.

#### 4.8.1.4 Wetlands

During the site reconnaissance, no wetlands nor vegetation indicative of saturated areas were observed on the Sears USARC property. According to the USFWS National Wetlands Inventory (NWI) map of the USARC property, the USARC does not have any NWI wetlands located on or within ½ mile of the property (USFWS 2010b).

### 4.8.2 Consequences

#### 4.8.2.1 Alternative 1 – No Action Alternative

**Direct Impacts.** No changes to the existing baseline conditions of biological resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions of biological resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no indirect impacts to these resources are anticipated.

#### 4.8.2.2 Alternative 2 – Caretaker Status Alternative

**Direct Impacts.** There would be negligible short-term beneficial impacts to biological resources under Alternative 2. The Army would reduce maintenance levels to the minimum level for surplus government property. If reduced maintenance procedures were implemented, there may be less frequent grass mowing. As the grass would get longer and resemble more of an old field, there would be a negligible increase in habitat potential. Impacts would continue for the duration of the caretaker status which could continue indefinitely.

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**Indirect Impacts.** Because Alternative 2 is limited to the Sears USARC property, indirect impacts to biological resources are not anticipated.

#### **4.8.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)**

**Direct Impacts.** Negligible short-term adverse impacts and negligible long-term beneficial impacts are anticipated to biological resources under Alternative 3. Demolition of the USARC buildings and removal of associated ornamental vegetation including some trees and shrubs would result in negligible short-term impacts to vegetation and wildlife habitat. After demolition is complete, mixed use affordable housing units would be constructed and cleared areas would be landscaped and replanted with grasses, as well as native and non-native (ornamental) plant species.

Currently, approximately 90 percent of the Sears USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. Replacing the USARC facilities with housing units and an outdoor recreational area would provide a negligible long-term increase in habitat to some urban wildlife species, such as songbirds, amphibians and reptiles, rodents, and rabbits.

There are no known wetlands, or federal or state threatened or endangered species or species habitat currently at the Sears USARC; consequently, impacts to these resources are not anticipated.

**Indirect Impacts.** Indirect negligible short-term adverse and minor long-term beneficial impacts are anticipated to biological resources under Alternative 3.

Indirect negligible short-term adverse impacts are anticipated to biological resources under Alternative 3 from demolition of the existing USARC buildings and construction of mixed use affordable housing units. Demolition and construction activities may increase sediment runoff and loading into off-site aquatic habitat and wetlands downstream of USARC property. BMPs used prior to demolition and construction, including barriers, tree protection, and buffer/filter strips would minimize the effects. Recommendations during and following construction include silt fences, sediment traps, temporary cover crops, and other erosion control BMPs to reduce soil erosion at the site and the associated impacts to off-site wetlands. Even with implementation of controls, short-term soil erosion is anticipated.

Implementation of Alternative 3 would have a minor long-term beneficial impact on biological resources as there would be a decrease in runoff and erosion that could affect off-site aquatic habitat and wetlands downstream of the USARC property due to an increase in the amount of vegetated surface on the property. Vegetative cover tends to slow down the movement of surface runoff and allows excess surface water to infiltrate. Currently, approximately 90 percent of the Sears USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings, incorporation of green roofs, and creation of an outdoor recreational area, it is reasonable to anticipate that there would be up to a 15 percent reduction in the amount of impervious surface area throughout the facility once it is redeveloped.

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## 4.9 CULTURAL RESOURCES

Cultural resources are prehistoric and historic sites, structures, districts, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for traditional, religious, scientific, or any other reason. Cultural resources are discussed here in terms of archaeological sites, including both prehistoric and historical occupations, architectural resources, and locations or practices of concern to Native American groups, including Traditional Cultural Properties.

Procedures for the identification, evaluation, and treatment of cultural resources are contained in a series of federal and state laws and regulations and agency guidelines. Archaeological, architectural, and Native American resources are protected by a variety of laws and their implementing regulations: the National Historic Preservation Act (NHPA) of 1966, as amended in 2006; the Archeological and Historic Preservation Act of 1974; the Archaeological Resources Protection Act (ARPA) of 1979; the American Indian Religious Freedom Act (AIRFA) of 1978 ; the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990; and AR 200-1, Environmental Protection and Enhancement. The Advisory Council on Historic Preservation (ACHP) further guides treatment of archaeological and architectural resources through the regulations, Protection of Historic Properties (36 CFR 800). Historic properties, as defined by the NHPA, represent the subset of cultural resources listed on, or eligible for, inclusion in the National Register of Historic Places (NRHP).

The NHPA requires tribal consultation if the historic property (1) is located on tribal lands, or (2) has religious or cultural significance to a Native American Tribe. ARPA prohibits any activity that impacts an archaeological resource located on public or Indian lands without a permit. NAGPRA protects cultural items -- human remains, funerary objects, sacred objects, and objects of cultural patrimony -- of Native American Tribes from inadvertent discovery or intentional excavation. AIRFA requires agencies to consult with traditional religious leaders and consider Native American religious practices.

The Proposed Action is sponsored by the USAR and involves federal assistance and federal permitting, licensing, or approval (36 CFR 800.16(y)). As a result, the Proposed Action is under the purview of Section 106 of the NHPA. Section 106 of the NHPA governs federal actions that could affect NRHP-eligible resources (*i.e.*, historic properties). Section 106 requires federal agencies to take into account the effects of their undertakings, including licensing and approvals, on NRHP-eligible resources and to afford the ACHP and other interested parties a reasonable opportunity to comment.

Identification of NRHP-eligible resources, including archaeological sites, architectural resources, and Native American resources, was conducted according to requirements of 36 CFR 800 for Section 106 of the NHPA. The Section 106 process was initiated with the Oregon Parks and Recreation Department (OPRD), the Oregon State Historic Preservation Office (SHPO) and the appropriate Native American groups on July 27, 2010 (Appendix A.2). The Area of Potential Effect (APE) was established in coordination with that office and a determination of eligibility for resources identified in the APE and a determination of effect was submitted to the SHPO as part of Section 106 coordination. In consultation with the SHPO, the USAR identified one NRHP-

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eligible resource within the APE and determined that the Proposed Action would result in an adverse effect to this resource. The USAR notified the ACHP of the determination and requested their interest in participating in the resolution of the adverse effect. The ACHP declined to participate. The Army consulted with the SHPO to identify appropriate mitigation measures to resolve the adverse effect. A Draft Memorandum of Agreement (MOA) for the proposed mitigation was prepared and submitted to the SHPO for review on December 30, 2010. The MOA contains stipulations for a proposed offsite, or substitute, mitigation that will preserve and protect the historic character of another USARC in Oregon of similar age, design, and construction as the Sears USARC and that will remain on the USAR inventory through the development of a Historic Building Management Plan. With SHPO concurrence on and execution of the MOA, the USAR will have resolved adverse effects to NRHP-eligible resources and the Proposed Action will not result in significant impacts. The MOA and SHPO correspondence are located in the Appendix A.2.

#### **4.9.1 Affected Environment**

To identify cultural resources that could be potentially affected by the Proposed Action, the area within which archaeological, architectural, and Native American resources would have the potential to be affected must be determined. As defined by 36 CFR 800.16(d) of Section 106 of the NHPA, the APE represents the "...geographic area or areas within which an undertaking could cause changes in the character or use of historic properties, if any such exists." In delineating the APE, factors taken into account include the elements of the Proposed Action, the existence of buildings, vegetation and terrain with respect to potential visual or audible impacts, and construction activities necessary for the Proposed Action.

The APE for cultural resources for the Proposed Action at the Sears USARC is the USAR property, defined as the footprint of the existing USAR facility, including the four buildings, paved and landscaped areas on the property (Figure 1.3).

A literature review was conducted to identify previously recorded archaeological, architectural, and Native American resources and assess the probability of undiscovered archaeological sites in the APE. The literature review assessed documents provided by the 88<sup>th</sup> RSC BRAC Environmental Coordinator/ Environmental Protection Specialist, documents prepared for the U.S. Army Reserve, including previous management plans and historic context studies.

- the updated *US Army Reserve Integrated Cultural Resources Management Plan (ICRMP), 70th RRC, Oregon*, (Cultural Site Research and Management ([CSRM] 2008);
- *Region 10 USARC Survey*, an architectural survey report documenting buildings at selected USARCs in the Northwest region of the United States, including Oregon (CSRM with Paula S. Reed and Associates 2008);
- *US Army Reserve Integrated Cultural Resources Management Plan (ICRMP), 70th Regional Readiness Command, Oregon* (Crane, et al. 2004);
- *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Moore et al. 2008).

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- Oregon SHPO archaeological site files and NRHP-listed resources conducted in 2004 as part of the literature review for the 2004 ICRMP (Crane, *et al.* 2004);
  - Environmental Condition of Property Report (USACE 2007);
  - Historical aerial photographs (1955, 1963, 1970, 1984, 1994);
  - Sanborn maps (1915, 1930, 1970);
  - historical and current topographic maps (1954, 1961, 1970, 1975, 1983);
  - Chain of Title Report (USACE 2007); and
  - as-built plans and modifications (Reisner and Urbahn 1952; Edmundson, Kochendoerfer, and Kennedy 1959)

No cultural resources investigations have been previously conducted at the Sears USARC. The archaeological site files search indicated that no previously recorded archaeological sites are located on the grounds of the Sears USARC. In addition, no NRHP-listed resources are located on the Sears USARC. The architectural survey and historic context study provide contextual and comparative data that were used to evaluate the NRHP eligibility of the Sears USARC as it is more than 50 years old.

#### **4.9.1.1 Prehistoric and Historic Background (Cultural Contexts)**

Detailed cultural contexts for USAR facilities in Oregon, including the Sears USARC, were developed during preparation of the 2004 USAR ICRMP, Historic Properties Component, 70th RSC, Oregon (Crane, *et al.* 2004). In the architectural survey report of selected USARCs in the Northwest region, historic contexts for resources in what was then the 70<sup>th</sup> RSC, including USARC facilities in Oregon, were further refined specific to Armory and Reserve Center Design, Cold War Era Context, including the Mission of the Department of Defense in the Cold War, and Cold War era-associated property types (CSRM with Paula S. Reed and Associates 2008).

In 2008, Hardy Heck, Moore (HHM), Inc. prepared *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* for the Department of Defense Legacy Resource Management Program (Moore et al. 2008). The study identified and categorized the various property types associated with the historical development of U.S. Army Reserve Centers, concentrating on the post World War II and early Cold War eras, and provides a historic context that can be used to evaluate them for eligibility for listing in the NRHP. Property types associated with the Early Cold War period were further divided into three categories by plan type and named accordingly as the “Compact Plan,” the “Sprawling Plan,” and the “Vertical Plan.” The study further stipulates the character-defining features that must be present for an Army Reserve Center constructed according to standardized plans to retain its integrity and convey its significance as an exemplar of its property type. Examples of these required character defining features include the original building footprint, original number of stories, original fenestration pattern, and original exterior finish (Moore et al. 2008).

The document does not evaluate individual Army Reserve Centers but identifies known examples of each property type. Although the Sears USARC is not documented in this study, the application of guidelines for evaluating the NRHP eligibility of Army Reserve Centers developed in this study was recommended by the U.S. Army Corps of Engineers to evaluate the NRHP eligibility of the Sears USARC.

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#### 4.9.1.2 Status of Cultural Resources Inventories and Section 106 Consultations

A cultural resources assessment, including an architectural resources evaluation was conducted at the Sears USARC as part of the development of this EA. Section 106 consultation is being conducted with the Oregon SHPO as a result of the Proposed Action.

**Archaeological Resources.** No previous archaeological surveys have been conducted and no archaeological resources have been identified at the Sears USARC. In a letter dated August 9, 2010, the Oregon SHPO indicated that the project area occurs within an area generally perceived to have a high probability for archaeological sites and/or human remains (Griffin 2010; Appendix A.2). However, the potential for NRHP-eligible archaeological sites is considered low for the Sears USARC parcel based on previous disturbance. Previous disturbance on the parcel includes the original construction of the Sears USARC, including the main administration building, the OMS, and parking and landscaped areas by 1960, as well as the more recent additions of storage sheds and renovations to the main building. Original grading of the parcel resulted in both cut and fill areas with an average elevation change of 2 feet or less. This previous disturbance has diminished the potential for intact archaeological resources to be located on the parcel. At present, only narrow strips of grassy or landscaped areas, comprising approximately 1.6 acres, occur on the Sears USARC.

The Oregon SHPO recommended extreme caution during future ground disturbing activities and, in the event that cultural materials are discovered, requires that all work must cease until an archaeologist can assess the discovery.

**Architectural Resources.** No architectural resources determined eligible for the NRHP have been previously identified at the Sears USARC. The facility consists of an administration building (referred to as Sears Hall or the administration building), an OMS building, a storage building, and a three-sided HAZMAT storage structure. The administration and OMS buildings were constructed in 1960 and are concrete block and brick construction on concrete slab. The storage building was constructed sometime after 1994 and the HAZMAT storage structure was constructed in 1975 (USACE 2007).

The plan or footprint of the 24,104-square-foot Sears Hall is an asymmetrical T. The main two-story block forms the top portion of the T and has a shallow pitched gable roof with parapet walls on the side (east and west) elevations; the main (south) elevation faces the street. The main block is connected, via a one-story hyphen, to a double-height rear wing with clerestory lights on the side elevations. The main block is used for administrative and classroom space while the rear wing is a drill or assembly hall.

Alterations at Sears Hall include the construction of a new main entry wall on the main (south) elevation, completed in 1985, including installation of new doors and windows with ceramic tile surrounds. The modified entrance is pierced by one set of double doors, two plate glass windows on either side of the doors, and two one-over-one light awning windows above the doors. During this renovation, a kitchen was also added to the rear wing (drill hall) of the administration building; the kitchen addition spans the length of the wing, on the west elevation. The kitchen was further renovated in 2002 and 2004 for use as office and storage space. Additional renovations to Sears Hall

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included replacement of the heater, boiler, roof, and improvements to the electrical system. Windows may also have been replaced over time.

The OMS building is situated on the northern portion of the parcel and consists of a 4,669 square foot single-story brick structure. The front (main) elevation is pierced by three vehicle service bays with roll-up metal doors. The OMS appears as “maintenance shop” on a general layout that included the main administration building dating to the period of original construction (Edmundson, Kochendoerfer, and Kennedy 1959).

The two buildings in the APE constructed in 1960 (Sears Hall and the OMS) were evaluated for NRHP eligibility using guidelines from the 2008 *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Historic Context) for the Department of Defense Legacy Resource Management Program (Moore et al. 2008). The Sears USARC is based on standardized plans for US Army Reserve Centers categorized in the Historic Context Study as the “Sprawling Plan” within the Early Cold War property type (Reisner and Urbahn 1952; Moore et al. 2008). Standardized plans for this property type were initially developed by the architectural firm of Reisner and Urbahn in 1952, updated in 1953, and last revised by the successor firm of Urbahn, Brayton, and Burrows in 1956, in collaboration with the USACE. Known examples of this plan type were constructed from 1953 through 1964, possibly continuing later, by the Army at reserve facilities across the country (Moore et al. 2008).

Because buildings categorized in the Sprawling Plan sub-type are part of a nationwide building program and are common throughout the United States, a strict set of guidelines to examine their physical integrity through the presence of unaltered character-defining features, as identified in the Historic Context (Moore et al. 2008) was established to identify the most intact and representative examples of this property type. Examples of these required character-defining features include the original building footprint, original number of stories, original fenestration pattern, and original exterior finish.

The main administration building of the Sears USARC exhibits an alteration to one of the character-defining features of this property type identified in the Historic Context, the main entrance assembly. The original main entrance assembly consisted of metal framing and plate glass panels surrounding two sets of double doors leading into a vestibule with a projecting level roof on a concrete porch. Plans for this entrance are based on the original standardized plans for a two-unit expansible facility without a basement and revised for specific construction of the Sears facility in 1959. Applying the guidelines of the Historic Context, alterations to character-defining features at the Sears USARC have diminished its architectural integrity for NRHP eligibility at the national level; however, in letters dated August 26, 2010, and September 22, 2010, the Oregon SHPO concluded that the facility may retain sufficient integrity to be eligible under Criterion A at the local level, although a localized historic context has not been developed.

The Oregon SHPO and the Army by consensus determination have agreed that the main administration building of the Sears USARC (Sears Hall) is eligible for the NRHP under Criterion A at the local level.

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Because an OMS is a support structure for the main Army Reserve center and lacks sufficient historical associations and/or design qualities on its own to meet any of the NRHP Criteria for eligibility, an OMS is not likely to be eligible on its own for inclusion on the NRHP.

**Native American Resources.** Native American resources can include, but are not limited to, archaeological sites, burial sites, ceremonial areas, caves, mountains, water sources, trails, plant habitat or gathering areas, or any other natural area important to a culture for religious or heritage reasons or practices. NRHP-eligible Native American resources or traditional sites are subject to the same regulations, and afforded the same protection, as other types of historic properties.

As part of the preparation of the 2004-2009 ICRMP, the 70<sup>th</sup> RSC identified Native American groups with a potential interest in areas in Oregon where US Army Reserve facilities occur. No properties of traditional, religious, and cultural importance were identified within the state of Oregon on property then owned or leased by the 70th RSC in the 2008 ICRMP update.

Consultation with nine Native American groups (Burns Paiute Tribe, Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, Confederated Tribes of Grand Ronde Community of Oregon, Confederated Tribes of Siletz Reservation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribe of the Warm Springs Reservation, Coquille Indian Tribe, Cow Creek Band of Umpqua Tribe of Indians, and Klamath Tribes) and the Oregon Commission on Indian Services was initiated on July 27, 2010 for the current proposed project at the USARC. Only the Confederated Tribes of Siletz Reservation responded via electronic mail, dated August 6, 2010, that they have no concerns related to cultural resource as a result of the Proposed Action. This consultation is documented by correspondence included in Appendix A.2.

#### **4.9.2 Consequences**

An undertaking is considered to have an effect on a historic property when the undertaking may alter characteristics of the property that may qualify it for inclusion in the NRHP. An effect is considered adverse when it diminishes the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects on historic properties would include, but not be limited to:

- Physical destruction, damage, or alteration of all or part of the property;
- Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the NRHP;
- Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
- Neglect of a property resulting in its deterioration or destruction; and
- Transfer, lease, or sale of the property (36 CFR 800.9[b]).

For the purposes of this EA, a significant impact under NEPA is defined as an "unresolvable" adverse effect under Section 106 of the NHPA. "Unresolvable" adverse

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effects may occur when the terms of mitigation cannot be agreed upon, or if the NHPA Section 106 process is foreclosed due to an inability to reach agreement.

#### **4.9.2.1 Alternative 1 – No Action Alternative**

**Direct Impacts.** Under the No Action Alternative, the USAR would not implement the Proposed Action and would continue the mission at the Sears USARC as it was being performed in April 2010. No direct impacts to cultural resources differing from the baseline condition would be expected.

**Indirect Impacts.** Because the Proposed Action would not be implemented under the No Action Alternative, no indirect impacts to cultural resources differing from the baseline condition would be expected.

#### **4.9.2.2 Alternative 2 – Caretaker Status Alternative**

##### **Direct Impacts**

**Archaeological Resources.** Direct impacts to archaeological resources from implementing caretaker status under Alternative 2 are not anticipated because NRHP-eligible archaeological resources are not likely to occur at the facility and limited ground disturbance would occur as part of the caretaker activities.

**Architectural Resources.** Direct impacts to architectural resources from implementing caretaker status under Alternative 2 are not anticipated. No actions or undertakings other than routine maintenance and care of NRHP-eligible architectural resources will occur at the facility. Only in-kind materials and appropriate treatment methods such as those specified in the *Secretary of Interior's Standards for the Treatment of Historic Properties* will be used while the facility is in caretaker status (NPS 2010).

**Native American Resources.** Direct impacts to Native American resources under Alternative 2 are not anticipated because no Native American resources have been identified at the facility.

##### **Indirect Impacts**

Because Alternative 2 is limited in geographical extent and scope, future new construction or architectural modification in nearby areas for public facilities and utilities associated with this project is not anticipated. Therefore, no indirect impacts to cultural resources would occur.

#### **4.9.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)**

##### **Direct Impacts**

**Archaeological Resources.** Direct impacts to archaeological resources from ground disturbing activities such as building and pavement demolition and removal, surface grading, and use of staging areas for heavy equipment and supplies under the Preferred Alternative are not anticipated because archaeological resources are not likely to occur at the facility; however, because of the potential for unidentified archaeological resources, the Oregon SHPO recommends extreme caution for future ground disturbing activities (Griffin 2010). Should cultural material be unexpectedly identified during the ground disturbing activities, BMPs that ensure that reasonable

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efforts are made to avoid or minimize adverse effects to such resources will be applied. All work should cease until a qualified archaeologist can assess the finds. Further consultation with the Oregon SHPO may be required to resolve adverse effects to archaeological resources if they are identified and cannot be avoided through project redesign.

**Architectural Resources.** Under the Alternative 3, moderate, adverse, direct impacts to cultural resources would occur as a result of the transfer and eventual demolition of the main administration building of the Sears USARC, an NRHP-eligible resource. The adverse effect will be resolved through the execution of an MOA with the Oregon SHPO and the subsequent completion of stipulations specified in the MOA. Because adverse effects to cultural resources will be resolved, implementation of Alternative 3 will not result in significant impacts to cultural resources.

**Native American Resources.** Direct impacts to Native American resources under the Preferred Alternative are not anticipated. No Native American resources have been identified at the facility.

### **Indirect Impacts**

Because Alternative 3 is limited in geographical extent and scope, future new construction or architectural modification in nearby areas for public facilities and utilities associated with this project are not anticipated. Therefore, no indirect impacts to cultural resources would occur.

## **4.10 SOCIOECONOMICS**

### **4.10.1 Affected Environment**

The following six sections discuss the existing economic and social conditions of the Region of Influence (ROI):

- economic development,
- demographics,
- housing,
- quality of life,
- environmental justice in minority and low-income populations, and
- protection of children from environmental health risks and safety risks.

The Sears USARC is located in the City of Portland, Oregon in Multnomah County. It is approximately 6 miles south of downtown Portland. The Sears USARC is located within the Portland-Vancouver-Beaverton Washington-Oregon Metropolitan Statistical Area (MSA), which includes Clackamas County, Oregon; Columbia County, Oregon; Multnomah County, Oregon; Washington County, Oregon; Yamhill County, Oregon; Clark County, Washington; and Skamania County, Washington. The term MSA is defined by the Office of Management and Budget (OMB) and is used to refer to an area with at least one urbanized core of 50,000 or more population plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties (OMB 2009). The Portland-Vancouver-Beaverton Washington-Oregon MSA is the ROI for this socioeconomic analysis. Information for the City of Portland,

Multnomah County, the State of Oregon, and the United States were added when available.

#### 4.10.1.1 Economic Development

The civilian labor force for Multnomah County and the ROI increased from 2004-2009. The Portland-Vancouver-Beaverton Washington-Oregon MSA transportation infrastructure and geography offer connectivity and time saving for international and domestic markets and serves as a west coast hub for trade and commerce throughout North America, Asia, and Europe. The ROI has grown 119 percent, measured by total employment, since 1975 with growth concentrated in the high-tech, metals, machinery and transportation equipment manufacturing, apparel and sporting goods, distribution and logistics, and creative services (PDC 2007). Civilian labor force statistics are given in Table 4.3.

<b>Jurisdiction</b>	<b>% Increase, (Decrease) 2004-2009</b>	<b>2009 Labor Force</b>	<b>2009 Unemployment Rate (%)</b>
Multnomah County	6.5	390,026	10.4
Portland-Vancouver-Beaverton WA-OR Metropolitan Statistical Area	7.9	1,175,710	11.4
Oregon	6.6	1,973,000	11.1
United States	-	154,142,000	9.3
Source: US Department of Labor, Bureau of Labor Statistics, 2009 (BLS 2009)			

In 2008, the major industry was the services industry with employing approximately 28 percent of the population. Employment in the major industry sectors by “place of work” for 2008 is shown in Table 4.4.

<b>Table 4.4 Total Full Time and Part-Time Employment by Industry by Place of Work, Sears USARC Region of Influence, 2008 (North American Industrial Classification System)</b>		
<b>Industry</b>	<b>Total</b>	<b>Percent</b>
Farm Employment	21,412	1.5
Forestry, Fisheries	(D)	-
Mining	(D)	-
Construction	84,815	6.1
Manufacturing	130,622	9.4
Transportation, Warehousing, Utilities	(D)	-
Wholesale Trade	66,531	4.8
Retail Trade	134,965	9.7
Finance, Insurance, Real Estate	134,485	9.7
Services	381,863	27.5
Government	147,062	10.6
<b>TOTAL EMPLOYMENT<sup>1</sup></b>	<b>1,388,060</b>	<b>100.0</b>
<i>Source: US Department of Commerce, Bureau of Economic Analysis, Regional Economic Information System, 2008</i> (D) Not shown to avoid disclosure of confidential information. 1 Total of column does not equal 261,810 because of non-disclosure of employment information industry sectors.		

#### 4.10.1.2 Demographics

##### Regional Population

The ROI covers approximately 6,684 square miles in size with a density of 319 people per square mile. The smallest county within the ROI, Multnomah County, is 435 square miles in size with a the highest ROI density of 1,606 people per square mile while the largest county, Clackamas County, is 1,868 square miles in size with a density of 201 people per square mile. Skamania County has the lowest density with 6 people per square mile. The 2009 average age of residents for the ROI was 36 years similar to the state average of 36 years (City Data 2009). The average household size in 2008 was 2.6 people with a median household income of \$54,851 (USCB 2008). The oldest county, Skamania County, has a median age of 38.7 years and the median household income is 28 percent lower than the average for the ROI. The Sears USARC is located in Multnomah County. The county has a median age of 34.9 years and a lower median household income (\$50,091) compared to the ROI. Washington County has the highest median household income (\$64,202) and the youngest average median age of 33 years.

The ROI has increased by approximately 47 percent between 1990 and 2009. Three of the ROI counties ranked 1<sup>st</sup> (Washington County), 2<sup>nd</sup> (Multnomah County) and 3<sup>rd</sup> (Clackamas County) out of 36 Oregon counties for overall growth. All have a high

birth and migration rate compared to other counties. Between 2000 and 2009, the three counties birth rates accounted for nearly 30 percent of the growth while their migration rates accounted for 40 percent of the growth (USCB 2008). Regional and local population trends are shown in Table 4.5.

Jurisdiction	2020 Projected Population	2009 Population Estimates <sup>3</sup>	Percent Change 1990-2000	2000 Population	1990 Population
Portland	NA	557,706	21.0	529,121	437,319
Multnomah County	756,390 <sup>1</sup>	726,855	13.1	660,486	583,887
Portland-Vancouver-Beaverton WA-OR Metropolitan Statistical Area	2,574,996 <sup>1,2</sup>	2,241,841	26.5	1,927,881	1,523,741
Oregon	4,359,258 <sup>1</sup>	3,825,657	20.4	3,421,399	2,842,321

*Source: US Department of Commerce, US Census Bureau, 1990 and 2000 US Census.*

*1 Office of Economic Analysis, Department of Administrative Services, 2004.*

*2 Office of Financial Management, State of Washington, 2007*

*3 US Census Bureau, Population Estimates Program.*

*N/A – Information Not Available*

*Note: Parentheses denote decrease.*

### 4.10.1.3 Housing

In 2010, the ROI had a higher than average cost of living with a rating of 109.5 (the US average is 100). The median value of an owner occupied housing unit in the ROI is 34.4 percent higher than the US average of \$192,400. Approximately 59 percent of the housing in Multnomah County is single family housing. The next most common type of housing is buildings with 20 or more units with 14 percent classified as this unit type (USCB 2008). Housing characteristics for the area are shown in Table 4.6.

**Table 4.6 Housing Characteristics, Sears USARC Region, 2008**

Jurisdiction	Total Housing Units 2008	Percent Vacant 2008	Percent Owner Occupied 2008	Median Value Owner Occupied 2008	Median Rent Renter Occupied 2008	Median Household Income 2008
Portland	252,923	6.6	57.7	\$293,300	\$690	\$48,993
Multnomah County	310,519	6.6	58.90	\$283,600	\$692	\$50,091
Portland-Vancouver-Beaverton WA-OR Metropolitan Statistical Area	886,360	8.1	69.3	\$258,643	\$595	\$54,851
Oregon	1,609,297	9.0	64.4	\$255,300	\$665	\$49,863
United States	127,762,925	12.0	67.1	\$192,400	\$819	\$52,175

Source: US Department of Commerce, Bureau of the Census, American Community Survey 2006-08.

There are 15,016 residential homes listed for sale in the ROI. Table 4.7 shows the price breakdown for the listed homes.

**Table 4.7 Residential Homes Listed for Sale, Region of Influence.**

Listed Price Range	Number of Homes Listed – Oregon					Washington		
	Clackamas County	Columbia County	Multnomah County	Washington County	Yamhill County	Clark County	Skamania County	Total ROI
\$0-\$100k	65	16	128	1	34	24	8	276
\$100-200k	308	174	1,439	347	268	815	33	3,384
\$200-300k	905	158	1,691	849	281	1,006	33	4,923
\$300--400	610	53	922	728	110	438	23	2,884
\$400-500k	339	48	395	324	81	252	13	1,452
\$500-600k	250	21	281	156	49	134	10	901
\$600-\$1,000,000	351	18	403	210	72	133	9	1,196
<b>TOTAL</b>	<b>2,828</b>	<b>488</b>	<b>5,259</b>	<b>2,615</b>	<b>895</b>	<b>2,802</b>	<b>129</b>	<b>15,016</b>

Source: Regional Multiple Listing Service, May 2010.

#### 4.10.1.4 Quality of Life

##### Education

Each of the counties within the ROI has a county-wide public school district in addition to private schools. Public education in Multnomah County is administered by 8 public school districts (Schooltree 2009). The county public school system comprises 162 elementary schools; 31 middle schools; 44 high schools; and several alternative and special schools (Table 4.8). Residents of either county have access to a variety of community colleges, and 4-year universities and colleges for post-secondary education opportunities. In Multnomah County, approximately 89 percent of the population 25 years or older have a high school diploma, and approximately 36 percent have a bachelor's degree. In the Portland-Vancouver-Beaverton Washington-Oregon MSA, approximately 88 percent of the population 25 years or older have a high school diploma, and approximately 27 percent have a bachelor's degree (USCB 2008). For the State of Oregon, approximately 88 percent of the population 25 years or older have a high school diploma, and approximately 27 percent have a bachelor's degree (USCB 2008).

	<b>Clackamas</b>	<b>Columbia</b>	<b>Multnomah</b>	<b>Washington</b>	<b>Yamhill</b>	<b>Clark</b>	<b>Skamania</b>
Public School Districts	11	5	8	7	7	9	4
Elementary Schools	100	12	162	103	26	78	7
Middle Schools	20	4	31	21	8	22	2
High Schools	22	5	44	22	9	24	1
<b>TOTAL SCHOOLS</b>	<b>142</b>	<b>21</b>	<b>237</b>	<b>146</b>	<b>43</b>	<b>124</b>	<b>10</b>

Source: Schooltree, 2009

##### Health

The ROI has 28 hospitals. Of the five counties in the ROI, Multnomah ranks number 1 for number of hospitals with 15 facilities. Skamania County has no hospitals while the remaining counties have between one and four hospitals.

##### Law Enforcement

Law enforcement within the ROI is provided by county and municipal police departments.

##### Fire Protection

Fire protection and emergency medical services are provided by municipal and township fire departments throughout the ROI. .

##### Recreation

The ROI has an array of recreational facilities and opportunities for public use. Portland has a department that manages park and recreation opportunities for the area. They have developed a natural areas acquisition strategy to complete and connect a system

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of natural areas in Portland. The park and recreation department operates 13 community centers, 11 community schools, 13 swim pools, a community music center, and an arts center (City of Portland 2010a). Multnomah County manages a mix of parks, natural areas, historic sites, and museums. The Columbia River Highway runs 196 miles along the Columbia River and provides a scenic drive modeled after roads in Europe (Multnomah County 2010).

#### **4.10.1.5 Environmental Justice**

##### **Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations.**

On February 11, 1994, President Clinton issued EO 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations. The purpose of this EO is to avoid the disproportionate placement of adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as individuals or groups of individuals subject to an actual or potential health, economic, or environmental threat arising from existing or proposed federal actions and policies. Low-income, *i.e.*, at or below the poverty threshold, is defined as the aggregate annual mean income for a family of four in 2006 was \$20,444 and \$22,025 in 2008.

The seven-county ROI has a slightly lower percentage of minorities than the state. Approximately two percent of the ROI is African American, and three percent is Asian. Approximately nine percent of the population in the ROI is of Hispanic ethnicity. Washington County and Multnomah County have the highest percentage of minorities, with both being approximately 20 percent of the population. According to US Census Bureau estimates, the highest concentration of individuals below the poverty level is in Multnomah County at 15 percent, which is higher than both the state and ROI value of approximately 13 percent. Table 4.9 summarizes this information.

<b>Jurisdiction</b>	<b>Total Population (2008)</b>	<b>Percent Minority Race Population (2008)</b>	<b>Percent Black or African American Population (2008)</b>	<b>Percent Hispanic Population (2008)</b>	<b>Percent American Indian and Alaska Native Population (2008)</b>	<b>Percent Asian Population (2008)</b>	<b>Median Household Income in Dollars (2008)</b>	<b>Percent of individuals Below Poverty (2008)</b>
City of Portland	551,226	21.4	6.4	8.8	1.4	6.5	\$48,993	15.2
Multnomah County	699,482	20.4	5.6	10.4	1.8	5.9	\$50,091	15.0
Portland-Vancouver-Beaverton WA-OR Metropolitan Statistical Area (ROI)	2,166,015	13.0	2.7	8.6	1.4	5.2	\$54,851	11.2
Oregon	3,735,524	13.8	1.7	10.6	1.8	3.5	\$49,863	13.4
United States	301,237,703	25.7	12.3	15.1	0.8	4.4	\$52,175	9.6

*Source: US Department of Commerce, US Census Bureau, American Community Survey 2006-2008.*

#### **4.10.1.6 Protection of Children**

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

On April 21, 1997, President Clinton issued EO 13045, Protection of Children from Environmental Health Risks and Safety Risks. This EO recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks.

It is Army policy to fully comply with EO 13045 by incorporating these concerns in decision-making processes supporting Army policies, programs, projects, and activities. In this regard, the Army ensures that it would identify, disclose, and respond to potential adverse social and environmental impacts on children within the area affected by a proposed Army action.

Within 1 mile of the Sears USARC, there are seven day care facilities and five early childhood and elementary schools. The areas surrounding the Sears USARC are primarily mixed residential and commercial uses.

#### **4.10.2 Consequences**

##### **4.10.2.1 Alternative 1 – No Action Alternative**

**Direct Impacts.** No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

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**Indirect Impacts.** No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Sears USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

#### **4.10.2.2 Alternative 2 – Caretaker Status Alternative**

**Direct Impacts.** Following the closure, operations would be relocated from the Sears USARC to Camp Withycombe, Oregon. The current and potential future locations of the installation are located within the same MSA; therefore, the direct impacts on the ROI and regional economy would not differ from baseline conditions.

There may be some negligible adverse economic impacts to businesses immediately surrounding the current facility. Restaurants, convenience stores, and gas stations within a short distance of the Sears USARC may have been utilized by the employees for small purchases. Any impacts from this loss of revenue would be negligible and localized.

Camp Withycombe is approximately 11 miles northwest of the Sears USARC. There would be no need for any of the personnel to relocate; thus, there would be no impacts to housing, education, fire protection, law enforcement, health care, and other public resources.

**Indirect Impacts.** Under this alternative, there would be benefits foregone from the delayed reuse of the property resulting in minor adverse indirect impacts. The City of Portland would lose economic benefits from potential employment, sales, and payment of property taxes from the reuse of the site. Potential developers of the site would lose the redevelopment opportunity and potential economic benefits. Residents of the Portland community would lose any potential employment that may be created through the construction phase and reuse of the property.

#### **4.10.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)**

**Direct Impacts.** Under Alternative 3, direct short-term negligible beneficial economic impacts would be realized by the regional and local economy during the construction phase of the proposed reuse. Employment generated by construction activities would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies.

The Economic Impact Forecast System (EIFS) model, developed by the USACE, Construction Engineering Research Laboratory, was used to assess the impacts of this alternative on the economy. The EIFS model provides a systematic method for evaluating the regional socioeconomic effects of government actions, particularly military actions. Using employment and income multipliers developed with a comprehensive regional/local database combined with economic export base techniques, the EIFS model estimates the regional economic impacts in terms of changes in employment generated, changes in population, and expenditures directly and indirectly resulting from project construction. The EIFS model evaluates economic impacts in terms of regional change in business volume, employment and personal income, and expenditures for local and regional services, materials, and supplies.

Although the EIFS model does not provide an exact measure of actual dollar amounts, it does offer an accurate relative comparison of alternatives.

The estimated total construction cost of the new Military Construction Projects under Alternative 3 is approximately \$14 million (2011 dollars). The estimated construction period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 4.92.

Table 4.10 provides the estimated direct, indirect, and total annual economic impacts of construction activities on business volume, income, and employment. These impacts would be realized annually over the length of the construction period. The increase in business volume, income, and employment includes capital expenditures, income, and labor directly associated with the construction activity. Table 4.10 also provides the indirect impacts on business volume, income, and employment because of the initial direct impacts of the construction activities. It should be noted that construction phase workers would not be expected to relocate. Appendix C contains the EIFS reports on impacts.

<b>Table 4.10 Estimated Annual Economic Impacts : Alternative 3, Property Reuse by Others Alternative</b>				
<b>Variable</b>	<b>Direct Impacts</b>	<b>Indirect Impacts</b>	<b>Total</b>	<b>RTV<sup>1</sup></b>
<b>Annual Construction Impacts<sup>2</sup></b>				
Sales (Business) Volume	\$10,072,270	\$39,483,310	\$49,555,580	0.04%
Income	\$5,208,909	\$5,931,564	\$11,140,470	0.02%
Employment	123	135	259	0.02%
<i>Source: Economic Impact Forecast System, US Army Corps of Engineers, Construction Engineering Research Laboratory.</i>				
1 Rational Threshold Value.				
2 2011 Dollars.				

The EIFS model also includes a Rational Threshold Value (RTV) profile to be used in conjunction with the forecast models to assess the degree of the impacts of an activity for a specific geographic area. For each variable (business volume, employment, income, and population), the current time-series data available from the US Bureau of Economic Analysis are calculated along with the annual change, deviation from the average annual change, and the percent deviation for each of these variables, which then defines a threshold for important annual regional economic impacts for a variable. Within the EIFS model the RTV is calculated for each of these variables when assessing the regional economic impacts of a specific project. If the RTV for a particular variable associated with the impacts of a specific project exceeds the maximum annual historic deviation for that variable, then the economic impacts are considered significant. If the RTV for a variable is less than the maximum annual historic deviation for that variable, then the regional economic impacts are not considered significant.

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Table 4.10 provides the RTV associated with each of the economic impacts resulting from the construction activity. The regional positive RTVs for each economic variable are as follows: sales volume (8.68%); income (8.16%); employment (2.89%); and population (1.41%). Thus, the RTV for each of the variables was found to be considerably less than the respective regional RTV. For this reason, construction associated with this alternative would be on a regional basis, and result in negligible beneficial annual regional economic impacts.

Camp Withycombe is approximately 11 miles northwest of the Sears USARC. There would be no need for any of the personnel to relocate; thus, there would be no impacts to housing, education, fire protection, law enforcement, health care, and other public resources.

There are minor long-term beneficial socioeconomic impacts of the Proposed Action related to environmental justice. The proposed reuse is for mixed-use affordable housing and this would increase the quality of life for low-income families. Some economic benefits could accrue to minority and low-income populations through employment during the construction phase of the Proposed Action.

There are no anticipated impacts to children from the Proposed Action; therefore, no measures are necessary to protect children.

**Indirect Impacts.** Indirect negligible short-term beneficial economic impacts would be realized by the regional and local economy during the construction phase of this alternative. Employment generated by construction activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4.10.

Under this alternative, the reuse would be mixed use affordable housing. There would be minor indirect beneficial long-term impacts to the Portland community. This reuse would occur through the sale of the property to the City of Portland via special deed. The transferred property would be developed by a non-profit entity for homeless use. The anticipated funding would be through a variety of sources, which may include Hope VI Grants, bonds, or low-income cost credits. Once construction is complete and the new housing units are utilized by the community, there would be a minor beneficial impact. Currently, the ROI has approximately 15 percent of the population considered below the poverty line. The reuse would provide subsidized housing for individuals and families and fulfilling a need in the community.

## 4.11 TRANSPORTATION

### 4.11.1 Affected Environment

#### 4.11.1.1 Roadways and Traffic

The Sears USARC can be reached via Interstate Highway 5, and SW Multnomah Boulevard. The main roadway accessing the Sears USARC property is SW Multnomah Boulevard. The City of Portland Transportation Department classifies SW Multnomah Boulevard as a district collector roadway. In 2009, traffic counts on SW Multnomah near the Sears USARC indicate a volume of approximately 19,000 vehicles per day (including both eastbound and westbound lanes (City of Portland 2010b).

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#### 4.11.1.2 Installation Transportation

The Sears USARC property has no roadways, only driveways and two parking lots, one for military equipment and one for POVs.

#### 4.11.1.3 Public Transportation

The Portland, Oregon area is served primarily by Portland International Airport, which is located 10 miles from the Sears USARC property. Amtrak train services are available from Vancouver, British Columbia, Los Angeles, California, and St. Paul, Minnesota. TriMet provides bus, light rail, and commuter rail services in the Portland metropolitan area. Boat marinas are also available in Portland.

SW Multnomah Boulevard has painted bicycle lanes on both the eastbound and westbound lanes. These lanes provide a connection to over 100 miles of bicycle lanes in the City of Portland. SW Multnomah Boulevard does not have pedestrian sidewalks (City of Portland 2010c).

### 4.11.2 Consequences

#### 4.11.2.1 Alternative 1 – No Action Alternative

**Direct Impacts.** No changes to the existing baseline conditions of transportation are anticipated. Because the Sears USARC would not close and personnel would not be realigned no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions of transportation are anticipated. Because the Sears USARC would not close and personnel would not be realigned no indirect impacts to these resources are anticipated.

#### 4.11.2.2 Alternative 2 – Caretaker Status Alternative

**Direct Impacts.** Negligible short-term adverse impacts to transportation are anticipated under Alternative 2. A slight increase in traffic may occur on SW Multnomah Boulevard during the closure of the Sears USARC as equipment, furnishings, and personnel are moved out of the facility.

Long-term negligible beneficial impacts are anticipated to roadways and traffic under Alternative 2. The number of military personnel and equipment driving to and from the property would be reduced, especially on drill weekends. There would no longer be 21 personnel driving to and from the Sears USARC on a daily basis. There would no longer be drill weekends once per month, in which 185 people drive to and from the USARC. A small number of vehicles would visit the facility occasionally as the Army provides for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of property.

**Indirect Impacts.** No indirect impacts are anticipated under Alternative 2. No additional impacts are expected beyond the direct impacts associated with the decrease of military related traffic and future vehicle use at the property.

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#### 4.11.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

**Direct Impacts.** Short-term minor adverse impacts are anticipated to roadways and traffic under Alternative 3. Construction vehicles normally have slower acceleration rates and wider turning radii. During demolition of the Sears USARC buildings and construction of the mixed use affordable housing units there would be increased congestion on SW Multnomah Boulevard.

Long-term moderate adverse impacts are anticipated to roadways and traffic under Alternative 3. The traffic pattern would change and there would be an increase in daily traffic volume. The mixed use affordable housing units would have two entrance roads instead of one. There would be increased regular daily traffic as residents come and go from the housing complex. Both weekday and weekend traffic is expected to be more regular than traffic that normally occurs at the Sears USARC. As part of the Reuse Master Planning process the LRA analyzed traffic in the project area. The study results indicated that traffic increases associated with multi-family residential housing would be acceptable at the SW 31<sup>st</sup> Ave and 35<sup>th</sup> Ave. intersections with SW Multnomah Boulevard. The study indicated that delays would be expected associated with the increased traffic at the un-signalized SW 28<sup>th</sup> Ave and SW Multnomah Boulevard intersection.

**Indirect Impacts.** No indirect impacts are anticipated under Alternative 3 as no additional impacts are expected beyond the direct impacts associated with the future vehicle use at the property.

### 4.12 UTILITIES

#### 4.12.1 Affected Environment

##### 4.12.1.1 Potable Water Supply

The City of Portland provides potable water service to the Sears USARC property. The City of Portland provides water to nearly one-quarter of the population of Oregon. The city's service area covers Portland residents and the residents of 19 suburban cities and water districts (City of Portland 2010d). Based on a review of available historical site and agency records and interviews with site personnel, a water supply well is not located at the site (USACE 2007).

##### 4.12.1.2 Wastewater System

The City of Portland provides sanitary sewer service to the Sears USARC property. The primary source of wastewater directed to the city sewer system includes non-processed wastewater (bathrooms, sinks, etc.) and storm water (USACE 2007). The Sears USARC property is serviced by the Columbia Boulevard Wastewater Treatment Plant. This plant serves more than 614,000 Portland residential and commercial customers and treats an average of 70 million gallons of sewage daily (City of Portland 2010e).

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#### 4.12.1.3 Storm Water System

The existing Sears USARC property drainage is collected through a series of catch basins, pipes and manholes to the east side of the property along SW 25<sup>th</sup> Avenue. The drainage then flows south and into the City of Portland system along SW Multnomah Boulevard (USACE 2007).

#### 4.12.1.4 Energy Sources

Northwest Natural Gas and Pacific General Electric provides gas and electric service to the USARC property (USACE 2007). Northwest Natural Gas serves about 660,000 residential and business customers in Oregon and Southwest Washington. It is the largest independent natural gas utility in the Pacific Northwest (Northwest Natural Gas 2010). Portland General Electric serves over 800,000 customers within a 4,000-square mile including 52 Oregon cities. The average annual cost for a residential customer is \$1,111 (Portland General Electric 2010).

#### 4.12.1.5 Communications

Comcast, Verizon, and Qwest provide telecommunications services to the Portland area. All three are large telecommunications providers with extensive regional coverage.

#### 4.12.1.6 Solid Waste

Private solid waste haulers are responsible for solid waste and recycling collection (Metro Regional Government 2010).

### 4.12.2 Consequences

#### 4.12.2.1 Alternative 1 – No Action Alternative

**Direct Impacts.** No changes to the existing baseline conditions of utilities are anticipated. Because the Sears USARC would not close and personnel would not be realigned no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions of utilities are anticipated. Because the Sears USARC would not close and personnel would not be realigned no indirect impacts to these resources are anticipated.

#### 4.12.2.2 Alternative 2 – Caretaker Status Alternative

**Direct Impacts.** Short-term direct negligible beneficial impacts are anticipated to utilities due to decreased consumption during the Army's caretaking period. No missions or training would take place at the USARC.

**Indirect Impacts.** No indirect impacts are anticipated to utilities under Alternative 2 due to decreased consumption during Army caretaker status.

#### 4.12.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

**Direct Impacts.** No direct impacts to utilities are anticipated under Alternative 3. Potential development of mixed use affordable housing units would be consistent with other similar development in the area, thereby not substantially changing the utilities demand. All property reuse utility needs would be within the capacity of current utility

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providers. A negligible increase in electrical demand would result under the proposed reuse. The anticipated annual electrical cost for Fiscal Year 2010 will be approximately \$16,000. This is \$106,000 less than the approximate \$122,210 for all 110 future housing units.

**Indirect Impacts.** No indirect impacts to utilities are anticipated under Alternative 3. The long-term capacities of regional utility systems are expected to be sufficient to accommodate increasing demand of the region over time.

## **4.13 HAZARDOUS AND TOXIC SUBSTANCES**

### **4.13.1 Affected Environment**

Specific environmental statutes and regulations govern HAZMAT and hazardous waste management activities at the Sears USARC. For the purpose of this analysis, the terms hazardous waste, hazardous materials, and toxic substances include those substances defined as hazardous by CERCLA, the Resource Conservation and Recovery Act (RCRA), AR 200-1, and Toxic Substances Control Act. In general, they include substances that, because of their quantity, concentration, or physical, chemical, or toxic characteristics, may present moderate danger to public health or welfare or the environment upon release. An Environmental Condition of Property (ECOP) Report was completed for the Sears USARC in 2007. This facility was classified as a DoD Environmental ECOP Category 2 property indicating that an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred (USACE 2007). The 88<sup>th</sup> RSC will provide an ECOP update prior to the property disposal.

#### **4.13.1.1 Uses of Hazardous Materials**

Since 1960, the Sears USARC has primarily functioned to provide administrative, classroom, maintenance, and storage space to the assigned Army Reserve units and to Army reserve personnel (USACE 2007).

Maintenance activities in the OMS building were limited to general vehicle servicing such as oil changes and preventative maintenance. As a result, small quantities of Petroleum, Oil, and Lubricant (POL) products were used at the Sears USARC. A wash rack and associated oil-water separator (OWS) was located west of the OMS building. The wash rack was removed in 1998. The current OWS system was installed in 1993 and is located at the far eastern end of the property (USACE 2007).

Chemicals used at the Sears USARC were associated with janitorial services and vehicle and facility maintenance activities. Janitorial chemicals were stored in designated storage areas in the main administrative buildings. Vehicle maintenance materials were stored at various locations throughout the property (USACE 2007).

Radon surveys were performed on the property in 1991 and 2006. The results of both surveys indicated radon levels were below actionable levels set by the USEPA in the sampled locations (USACE 2007).

An Asbestos Survey was completed in 1994 for the property. ACM are known to exist in certain building materials. At the Sears USARC, both friable and non-friable ACM are present in the administration building (pipe insulation above the ceiling tiles is reported

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as friable). Non-friable ACM is present in the dark brown floor tiles and associated mastic in the administration building. Materials observed in the OMS are assumed to be ACM as well (USACE 2007). According to the 1994 Asbestos Survey, thermal pipe insulation at the Sears USARC was removed and replaced with fiberglass insulation (USACE 2007).

According to 88<sup>th</sup> RRC personnel, no known PCB containing equipment is located on the property. Light ballasts located in the facility may contain PCBs due to the age of the building. A pad-mounted transformer located on site reportedly does not contain PCBs. Due to the lack of documentation, three pole mounted transformers on the property are not labeled and may contain PCBs (USACE 2007).

The Sears USARC historically operated an indoor firing range. In 1994, range removal and abatement was performed. The 1994 closure report concluded that the property was free of any accessible lead contamination associated with the firing range. However, high levels of lead may be present in or beneath the paint due to dust associated with the firing range. The former firing range is now used as a training classroom (USACE 2007).

LBP has not been formally documented in either of the buildings. However, it is suspected that LBP is present in both buildings since the buildings were constructed before 1978. Painted surfaces remain in good condition absent of chipped or peeling paint. As mentioned above, significant levels of lead may be present in or beneath the paint as a result of the indoor firing range (USACE 2007).

#### **4.13.1.2 Storage and Handling Areas**

Historically, hazardous materials (e.g., POLs, solvents associated with vehicle maintenance) were stored in the former POL cage located on the northeastern portion of the property, in the three-sided HAZMAT storage structure, in the metal HAZMAT shed, and within designated areas within the OMS building. The ODEQ inspections noted deficiencies in storage practices and recordkeeping at the Sears USARC (USACE 2007). These deficiencies were subsequently corrected and storage practices are currently compliant with ODEQ requirements.

The 2007 ECOP Report does not indicate that any CERCLA hazardous substances were stored at the Sears USARC in excess reportable quantities and for 1 year or more.

Three heating oil USTs (one 10,000-gallon and two 675-gallon USTs) were historically located on the property. These three tanks were removed in 1993. No ASTs were historically located on the property. There are currently no USTs or ASTs on the property (USACE 2007).

#### **4.13.1.3 Hazardous Waste Disposal**

The Sears USARC has a Conditionally Exempt Small Quantity Generator hazardous waste status under RCRA. This facility generates POL waste associated with minor vehicle maintenance and some limited janitorial supplies. According to the 2007 ECOP, on-site disposal of HAZMAT or waste has not occurred at the Sears USARC. Disposal activities are in accordance with federal, state, local, and DoD requirements. No violations were reported for the abovementioned waste streams.

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#### 4.13.1.4 Site Contamination and Cleanup

Petroleum-contaminated soil (approximately 98 tons) was associated with the 675-gallon heating oil UST removed in 1993. After this UST closure action, soil contamination remained. A vapor barrier was placed at the bottom of the heating oil UST tank pits and backfilled with sand and clean fill. Additional contaminated soil was excavated in 1996. Analytical results indicate that no groundwater contamination exists at the site; however, soil contamination (low concentrations of diesel fuel constituents ranging from 110 to 440 parts per million which are above the 100 parts per million action level) still remained at the Sears USARC in 1996 (GSA, Inc. 1996). Detectable concentrations of residual contaminants in the groundwater were below regulatory action levels (USACE 2007). The 88<sup>th</sup> RSC completed cleanup activities in accordance with Oregon Administrative Rules 340-122-205 through-360 and ODEQ issued a “No Further Action” letter for this release on October 26, 2010. Correspondence regarding this leaking UST and the No Further Action letter are located in Appendix A.1.

#### 4.13.1.5 Special Hazards

No special hazards were identified at the Sears USARC in the 2007 ECOP Report (USACE 2007).

### 4.13.2 Consequences

#### 4.13.2.1 Alternative 1 – No Action Alternative

**Direct Impacts.** No changes to the existing baseline conditions of hazardous and toxic substance are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no direct impacts to this resource are anticipated. There would be no change in the generation and disposal of hazardous and toxic substances.

**Indirect Impacts.** No changes to the existing baseline conditions of hazardous and toxic substances are anticipated. Because the Sears USARC would not close and personnel would not be realigned; no indirect impacts to this resource are anticipated. There would be no change in the generation and disposal of hazardous and toxic substances.

#### 4.13.2.2 Alternative 2 – Caretaker Status Alternative

**Direct Impacts.** Negligible short-term beneficial direct impacts are expected to hazardous and toxic substances under this alternative. The Army would continue maintenance activities necessary to protect the property and buildings from deterioration. Any remaining small quantities of hazardous and toxic substances would be disposed of by the USAR in accordance with federal, state, local, and DoD requirements after closure of the Sears USARC. The removal of these hazardous and toxic substances would result in a negligible short-term beneficial impact.

**Indirect Impacts.** No indirect impacts are anticipated under this alternative. Continuing maintenance activities and disposal of small quantities of remaining hazardous and toxic substances would be limited to the Sears USARC property.

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#### 4.13.2.3 Alternative 3 – Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

**Direct Impacts.** Minor long-term beneficial and negligible short-term and long-term adverse direct impacts would occur through the reuse of the Sears USARC property. Under this alternative, the property would be transferred from the Army to the City of Portland “as is.” No remedial activities would be performed by the Army prior to the transfer of the property (e.g., removal of asbestos floor tiles, lead contained beneath or within paint in the former firing range). Demolition activities that would require the removal of ACM, LBP and PCB materials would be managed and disposed by the City of Portland or its designee. Disposal activities would be in accordance with federal, state, local, and DoD requirements. Long-term beneficial impacts are anticipated with the proper removal of these materials from the property. The elimination of the use of HAZMAT at the Sears USARC would also result in a minor long-term beneficial impact.

There would be negligible short-term adverse direct impacts due to the potential for releases and spills that might occur during demolition and construction. Continued operations on the property by the City of Portland would result in negligible long-term adverse direct impacts due to the potential of leakage or spill of hazardous materials from vehicles parked at the new housing development. This includes gasoline, diesel, hydraulic fluid, motor oil, transmission fluid, and antifreeze.

**Indirect Impacts.** No indirect impacts are anticipated under this alternative since impacts would be limited to the Sears USARC property.

### 4.14 CUMULATIVE EFFECTS

#### 4.14.1 Introduction

The cumulative impact analysis evaluates the incremental effects of implementing any of the alternatives when added to past, present, and reasonably foreseeable future USAR actions at the Sears USARC and the actions of other parties in the surrounding area, where applicable. The cumulative impact analysis has been prepared at a level of detail that is reasonable and appropriate to support an informed decision by the USAR in selecting a preferred alternative. The cumulative impact discussion is presented according to each of the implementation alternatives listed.

The key components of the cumulative impact analysis include the following:

**Cumulative Impact Analysis Area.** The cumulative impact analysis area includes the area that has the potential to be affected by implementation of the proposed action at the Sears USARC. This includes the installation and the area immediately proximate to the installation boundary and varies by resource category being considered.

**Past and Present Actions.** Past and present actions, other than the proposed action, are defined as action within the cumulative analysis area under consideration that occurred before or during April 2010 (the environmental baseline for this EA). These include past and present actions at the project site and past and present demographic, land use, and development trends in the surrounding area.

In most cases, the characteristics and results of these past and present actions are described in the Affected Environment sections under each of the resource categories

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covered in this EA. The Sears USARC and its surroundings are located in the west-northwest portion of Multnomah County, Oregon, within the city limits of Portland. The area is a primarily residential area with some commercial businesses situated southeast of SW Multnomah Boulevard.

The Sears USARC property has been owned by the US Government since February 20, 1959. Based on an analysis of historical topographic maps and aerial photographs, no structures were located on the five parcels originally purchased for the Sears USARC.

By 1958, residential and commercial development in the area was sufficient to require the streets to be renumbered, with north-south oriented streets changing from “Street” to “Avenue” and numbers increasing by one from east to west along Multnomah Boulevard (e.g., 26th Street was renamed 27th Avenue).

By 1970 the northern lots adjacent to USARC Sears contained multiple residential structures and the eastern adjacent lots contained another residential structure and a private garage (with a 40 truck capacity). Residential and commercial development in the area has continued to establish the present conditions of a developed urban mixed use neighborhood.

**Reasonably Foreseeable Future Actions.** Reasonably foreseeable future actions are mainly limited to those that have been approved and that can be identified and defined with respect to timeframe and location. Reasonably foreseeable future actions that have been identified and considered in the analysis of cumulative impacts, both on-USARC and off-USARC are listed below.

- Hope VI Application from the housing development authority of Portland to redevelop the Hillsdale Terrace 60 unit public housing community.
- Continued expansion of housing and commercial development in the area surrounding the Sears USARC.
- Continuation of present management activities within the surrounding community and the continuation of existing community development trends.
- Continued development along the Interstate system and major arterials in the Portland area.
- Transfer of the Alfred Sharff USARC located at 8801 N. Chataqua Boulevard in Portland, Oregon from USAR to the Oregon National Guard.

Units currently stationed at the Sears USARC would be relocating to a new facility as a result of the BRAC recommendation. The units would be relocated to Camp Withycombe approximately 11 miles northwest of the Sears USARC. Impacts due to the relocation of units at Camp Withycombe are being addressed in a separate NEPA document.

#### **4.14.2 Potential Cumulative Impacts**

##### **4.14.2.1 Alternative 1 – No Action Alternative**

Under Alternative 1 it is anticipated that past and present development trends on the installation and in the surrounding civilian community would continue. However, for the closure action directed by the BRAC Commission, it is noted that for the No Action

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Alternative, maintenance of current condition is not feasible, since the BRAC actions are Congressionally mandated actions.

#### 4.14.2.2 Alternative 2 – Caretaker Status Alternative

Cumulative impacts under Alternative 2 by resource category are as follows:

- **Land Use.** There are no anticipated cumulative impacts because there would be no changes to land use.
- **Aesthetic and Visual Resources.** There would be minor adverse impacts to aesthetics and visual resources under this alternative if there are other vacant properties in the vicinity of the Sears USARC. The cumulative impact may have a short-term adverse impact on property values in the vicinity of the Sears USARC until redevelopment of the property occurs.
- **Air Quality.** Following the closure and during implementation of caretaker status, there would be a net decrease in emissions since there would be no operations occurring on site. Therefore, there are no anticipated adverse cumulative impacts.
- **Noise.** There would be a decrease in noise following the closure and implementation of caretaker status. There are no anticipated adverse cumulative impacts.
- **Geology and Soil.** No cumulative impacts would occur under this alternative. After closure, no operations would occur on site except for routine maintenance; there would be no change from existing conditions; and thus, no impacts to geology or soil would be expected.
- **Water Resources.** No cumulative impacts are anticipated under the caretaker status alternative as stormwater runoff on the site and within the area will remain unchanged.
- **Biological Resources.** There are no anticipated cumulative impacts because no biological resources would be modified under caretaker status.
- **Cultural Resources.** During caretaker status, there are no anticipated cumulative impacts to cultural resources because no NRHP-eligible archaeological or Native American resources have been identified or are likely to occur at the facility and only routine maintenance and care of NRHP-eligible architectural resources will occur at the facility. The implementation of Alternative 2 along with other foreseeable actions in the area will not alter the historic fabric of the surrounding area or contribute to the deterioration of any other architectural resources eligible for the NRHP in the vicinity of the project area.
- **Socioeconomics.** Under this alternative, the Sears USARC would close and relocate the units to Camp Withycombe, Oregon. Both of installation sites are located within the Portland-Vancouver-Beaverton Washington-Oregon MSA; therefore, the impacts on the ROI and regional economy would not differ from baseline conditions. There are no anticipated cumulative impacts

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- **Transportation.** There would be a decrease in the number of vehicles following the closure and implementation of the caretaker status. There are no anticipated cumulative impacts.
  - **Utilities.** There are no anticipated cumulative impacts because there would be a decrease in use of utilities resulting from decreased consumption following the closure and implementation of the caretaker status.
  - **Hazardous and Toxic Substances.** Following the closure and during implementation of the caretaker status, there would be a net decrease in the amount of hazardous waste and toxic substances on site. Therefore, there are no anticipated cumulative impacts.

#### 4.14.2.3 Alternative 3 - Demolition of Buildings and Construction of Housing Units (Preferred Alternative)

Cumulative impacts under Alternative 3 by resource category are as follows:

- **Land Use.** Because the reuse and identified reasonably foreseeable future actions (e.g. Hillsdale Terrace Neighborhood) are residential developments that are compatible with the primarily residential surroundings and associated developed properties, there are no anticipated adverse cumulative impacts.
- **Aesthetic and Visual Resources.** There would be potential for long-term negligible adverse cumulative impacts to aesthetic and visual resources associated with the construction required for the reuse and future developments in the area surrounding the Sears USARC. There would also be potential for long-term negligible beneficial cumulative impacts from the Sears Hall reuse with a community park, green roof, and decreased impervious surface and the redevelopment of the Hillsdale Terrace Neighborhood.
- **Air Quality.** There would be a negligible short-term increase in emissions from the use of construction vehicles associated with the construction on the Sears site, Hillsdale site, and other construction in the area. It is anticipated that an increase in personal vehicles associated with the various reasonably foreseeable actions in the area would produce negligible adverse cumulative impacts from the slight increase in emissions associated with increased vehicles in the area.
- **Noise.** There would be a minor increase in noise from the use of construction vehicles for demolition and construction of mixed multifamily units at the Sears USARC, Hillsdale Terrace site, and other and adjacent construction activities in the area. Therefore, there would be a minor adverse cumulative impact from the increase in noise in the area.
- **Geology and Soil.** Under this alternative, there is potential for minor adverse cumulative impacts to soil due to erosion, removal, and compaction through implementation of construction and demolition projects under the Proposed Action combined with the reasonably foreseeable future development projects in the area. These impacts would be short-term and most of the development would take place on previously disturbed urban lots.

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- **Water Resources.** Stormwater runoff from soil disturbance from the Proposed Action combined with soil disturbance from reasonably foreseeable construction projects implemented in the surrounding area could have minor short-term adverse cumulative effects on downstream water resources. Compliance with local stormwater rules and regulations during construction will minimize impacts and result in minor short-term adverse cumulative impacts to water resources in the area.
  - **Biological Resources.** The project area and surroundings are urban and well-developed; consequently local biological resources are those associated with urban environments. Runoff from soil disturbance from the Proposed Action combined with soil disturbance from other identified construction projects implemented in the surrounding area could have negligible indirect adverse cumulative effects on downstream aquatic habitat and wetland resources.
  - **Cultural Resources.** Cumulative impacts to cultural resources are not anticipated to occur with the implementation of Alternative 3 because no NRHP-eligible archaeological or Native American resources have been identified or are likely to occur at the facility. The transfer out of federal ownership and eventual demolition of this USARC will not contribute to cumulative effects on this architectural resource type because the Sears USARC is only one of several hundred examples constructed nationwide according to standardized plans that will remain in the USAR inventory, some of which are likely to be eligible for the NRHP; the loss of one example will not contribute to a cumulative effect on this resource type. Within the Portland area, another similarly constructed USARC occurs, and two others occur in other areas of the state, and will remain in military ownership for the foreseeable future. Two of these three other USARCs in Oregon are eligible or potentially eligible for the NRHP.
  - **Socioeconomics.** Negligible beneficial short-term cumulative impacts would be in the form of increased business volume, income, and employment, associated with BRAC construction and activities and future development (e.g. Hillsdale Terrace) in the surrounding areas. The City of Portland also benefits from increased sales associated with the reuse and increased tax revenues from future residential and commercial developments in the area.
  - **Transportation.** Negligible short-term adverse cumulative impacts can be expected from traffic congestion due to construction equipment entering and leaving the installation construction sites if combined with other construction traffic in the adjacent area.
  - **Utilities.** There are no anticipated cumulative impacts because the mixed development reuse utility demand would be consistent with other similar development in the area.
  - **Hazardous and Toxic Substances.** Construction and redevelopment projects associated with the proposed action and other reasonably foreseeable future actions would be consistent with the current urban setting, consequently no

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changes to the affected environment are anticipated and no cumulative impacts would be expected to occur.

#### **4.15 MITIGATION SUMMARY**

As discussed in Sections 4.1 through 4.14 above, no significant adverse or significant beneficial impacts have been identified or are anticipated as a result of implementing any of the Proposed Action alternatives or the No Action Alternative. An adverse effect to cultural resources was identified as a result of implementing Alternative 3 but because the adverse effect will be resolved through mitigation, in consultation with the Oregon SHPO and formalized with the execution of an MOA, it will not result in a significant adverse impact, as discussed in Section 4.9.2.

As a result, only one mitigation measure is required as part of this EA to reduce an adverse effect to a non-significant impact level.

In accordance with definitions provided in 40 CFR 1508.20 (a–e) and 32 CFR Part 651.13, measures can be taken to diminish adverse impacts in the following ways:

- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
- Compensating for the impact by replacing or providing substitute resources or environments.

In consultation with the Oregon SHPO, the Army prepared a Draft MOA to resolve the adverse effect and submitted it for review on December 30, 2010. The MOA contains stipulations for a proposed offsite, or substitute, mitigation that will preserve and protect the historic character of another USARC in Oregon of similar age, design, and construction as the Sears USARC and that will remain on the USAR inventory through the development of a Historic Building Management Plan. A copy of the Draft MOA is included in Appendix A.2. Additionally, the Army contacted the ACHP to request their interest in participating in the resolution of adverse effects, but the ACHP declined. With a signed and executed MOA, there would be no significant impacts to cultural resources as defined under NEPA. In addition, execution of the MOA concludes the Section 106 process under the NHPA. The Army will be required to fulfill the stipulations in the MOA, within a timeframe specified in the MOA.

#### **Best Management Practices.**

Local, state, and federal regulations for noise, air, water, and soil resources will be adhered to during all phases of demolition and construction, as appropriate, to minimize impacts associated with implementing the proposed action.

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BMPs regarding the inadvertent discovery of cultural resources during ground disturbing activities will ensure that reasonable efforts are made to avoid or minimize adverse effects to NRHP-eligible resources. Should cultural material be encountered, all work should cease until a qualified archaeologist can assess the finds. Further consultation with the Oregon SHPO may be required to resolve any unavoidable adverse effects to cultural resources if they may be eligible for the NRHP.

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## **SECTION 5.0 FINDINGS AND CONCLUSIONS**

This EA was conducted in accordance with the requirements of NEPA, the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500), and 32 CFR 651 Environmental Analysis of Army Actions. As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the each of the Implementation Alternatives and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a FNSI is warranted, and preparation of an EIS is not required. Table 5.1 provides a summary of the impacts identified in this analysis.

Therefore, any of the alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC Act (Public Laws 101-510 and 107-107); consequently, it has not been selected for implementation.

Alternative 3 is the preferred alternative of the Army and the LRA. This alternative would allow future development in support of the need of affordable housing in the City of Portland and the SWCP.

Table 5.1 Impact Summary <sup>1</sup>							
RESOURCE AREA	NO ACTION	Alternative 2			Alternative 3		
		Direct	Indirect	Cumulative	Direct	Indirect	Cumulative
Land Use					□		
Aesthetic and Visual Resources		●		●	○, □		○, □
Air Quality		□			○		○
Noise					●, □		●
Geology and Soil					●, ■	□	●
Water Resources					○, ■	○, ●, □	●
Biological Resources		□			○, □	○, ■	○
Cultural Resources					●		
Socioeconomics		○	●		□, ■	□, ■	□
Transportation		○, □			●, ●		○
Utilities		□					
Hazardous and Toxic Substances		□			■, ○		

□ Beneficial Effect (Negligible)	○ Adverse Effect (Negligible)
■ Beneficial Effect (Minor)	● Adverse Effect (Minor)
■ Beneficial Effect (Moderate)	● Adverse Effect (Moderate)
◆ Beneficial Effect (Significant)	◇ Adverse Effect (Significant)

<sup>1</sup>A blank cell indicates no impact.

## SECTION 6.0 PREPARERS LIST

Personnel involved in the development of this EA include the following:

Name	Education and Experience	Primary Responsibilities
Douglas Bice	M.B.A., M.S. Environmental Health, M.S. Safety. 25 years experience in regulatory compliance and air quality issues.	Key participant in preparation of EA text and supporting sections, primarily air quality section and related air conformity calculations.
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Susan Bupp	B.A. Anthropology, M.A. Anthropology. 34 years of experience.	Cultural Resources Specialist; responsible for preparation of cultural resources affected environment and consequences.
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Richard Hall	B.S. Environmental Biology, M.S. Zoology. 24 years of experience in environmental assessment and impact studies, biological community investigations, and ecosystem restoration.	Project Manager/Senior Project Planner; data collection and key participant in description of proposed action, alternatives formulation, and related environmental analyses.
Sherrie Keenan	B.A. Journalism. 32 years experience in business writing/editing; including DHS and DoD environmental documents in compliance with NEPA-CEQ guidelines.	Editing and Quality Assurance.

Name	Education and Experience	Primary Responsibilities
Michael Kulik	B.S. Environmental Biology, M.S. Environmental Science, Masters of Public Affairs, LEED AP. 5 years experience in environmental compliance and hazardous materials assessment and remediation.	Environmental Scientist, data collection, analysis, and key participant in preparation of EA text and supporting sections.
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Darren Mitchell	B.S. Biology, M.S. Biology. 5 years experience in working on environmental compliance, wildlife management, wetland delineations, and NEPA planning.	Environmental Scientist, data collection, analysis, and key participant in preparation of EA text and supporting sections.
Amanda Molsberry	B.A. Geography, M.S. Environmental Science and Policy. 5 years experience in conservation design, environmental planning, and socioeconomic analysis.	Environmental Scientist, data collection, analysis, and key participant in preparation of EA text and supporting sections.
Randy Norris	B.S. Plant and Soil Science, Master of Urban Planning/Environmental Planning. 19 years experience in environmental impact assessment, environmental management and planning.	Principal Scientist; key participant in description of proposed action, alternatives formulation, and environmental impact analyses.
Rebecca Porath	B.S. Fisheries and Wildlife Management, M.S. Zoology. 12 years experience in environmental, biological, and natural resource planning projects.	Environmental Scientist, data collection, analysis, and key participant in preparation of EA text and supporting sections.

---

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## **SECTION 9.0 PERSONS CONSULTED**

All information was solicited and collected from USAR installation personnel and members of the LRA (PDC) in preparation of this document.

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## SECTION 10.0 ACRONYMS

<b>A</b>		dBA	Decibel A-Weighted Noise Levels
ACHP	Advisory Council on Historic Preservation	dBC	Decibel C-Weighted Noise Levels
ACM	Asbestos Containing Material	DNL	Day Night Average Sound Level
ADNL	A-Weighted Day Night Level	DoD	Department of Defense
APE	Area of Potential Effect	DOGAMI	Oregon Department of Geology and Mineral Industries
AR	Army Regulation	<b>E</b>	
Army	US Army	EA	Environmental Assessment
ARPA	Archaeological Resources Protection Act	ECOP	Environmental Condition of Property
AST	Aboveground Storage Tank	EF	Emission Factors
<b>B</b>		EIFS	Economic Impact Forecast System
BMP	Best Management Practice	EIS	Environmental Impact Statement
BRAC	Base Closure and Realignment	EO	Executive Order
<b>C</b>		<b>F</b>	
CAA	Clean Air Act	FEMA	Federal Emergency Management Agency
CDNL	C-Weighted Day Night Level	FNSI	Finding of No Significant Impact
CEQ	Council on Environmental Quality	FPPA	Farmland Protection Policy Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	<b>G</b>	
CFR	Code of Federal Regulations	<b>H</b>	
CSRM	Cultural Site Research and Management	HABS/HAER	Historic American Building Survey/Historic American Engineering Record
<b>D</b>		HAP	Hazardous Air Pollutant
dB	Decibel	HAZMAT	Hazardous Material

HUD	Housing and Urban Development	NZ	Noise Zones
<b>I</b>		<b>O</b>	
ICRMP	Integrated Cultural Resources Management Plan	ODEQ	Oregon Department of Environmental Quality
<b>J</b>		OMB	Office of Management and Budget
<b>K</b>		OMS	Organizational Maintenance Shop
<b>L</b>		OPRD	Oregon Parks and Recreation Department
LBP	Lead-Based Paint	OWS	Oil-Water Separator
LRA	Local Redevelopment Authority	<b>P</b>	
<b>M</b>		PCB	Polychlorinated biphenyls
MSA	Metropolitan Statistical Area	PDC	Portland Development Commission
<b>N</b>		POL	Petroleum, Oils, and Lubricants
NAAQS	National Ambient Air Quality Standards	PM <sub>2.5</sub>	particulate matter equal to or less than 2.5 microns in size
NEPA	National Environmental Policy Act	PM <sub>10</sub>	particulate matter equal to or less than 10 microns in size
NHPA	National Historic Preservation Act of 1966	<b>Q</b>	
NAGPRA	Native American Graves Protection and Repatriation Act	<b>R</b>	
NOI	Notice of Interest	RCRA	Resource Conservation and Recovery Act
NPDES	National Pollutant Discharge Elimination System	ROI	Region of Influence
NPS	National Park Service	RRC	Regional Readiness Command (
NRCS	Natural Resource Conservation Service	RSC	Regional Support Command
NRHP	National Register of Historic Places	RTV	Rational Threshold Values
NWI	National Wetlands Inventory	<b>S</b>	
		SWCP	Southwest Community Plan

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SHPO	State Historic Preservation Officer
Sears Hall	Administrative building at Sears USARC
SIP	State Implementation Plan

## T

## U

US	United States
USACE	United States Army Corps of Engineers
USAR	United States Army Reserve
USARC	United States Army Reserve Center
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tanks

## V

VOC	Volatile Organic Compounds
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## W

## X

## Y

## Z

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## APPENDIX A - AGENCY COORDINATION

A.1 Initial Agency Consultation Letters.....	A-3
A.2 SHPO/ACHP - Section 106 Consultation .....	A-17
A.3 USFWS Consultation .....	A-115
A.4 Agency and Public Notices.....	A-129

### Public and Agency Comments

As noted in Section 1.3, public involvement includes public comment on the Draft Environmental Assessment. All agencies and organizations having a potential interest in the Proposed Action are provided the opportunity to participate in the decision making process.

The Army invites public participation in the NEPA process. Consideration of the views and information provided by all interested persons promotes open communication and enables better decision making. Agencies, organizations, Native American groups, and members of the public having a potential interest in the Proposed Action, including minority, low-income, and disadvantaged persons, are urged to participate in the NEPA process.

Per requirements specified in 40 CFR 1500-1508, the EA was available for public and agency comment for a 30-calendar-day review period (starting with the publication of the NOA) to provide agencies, organizations, and individuals with the opportunity to comment on the EA and draft FNSI. Public notices were published in local newspapers to inform the public that the EA and draft FNSI were available for review. The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and draft FNSI for review, listed public libraries where paper copies of the EA and draft FNSI could be reviewed, and advised the public that an electronic version of the EA and draft FNSI were available for download at the following Web site:

[http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm).

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## A.1 Initial Agency Consultation Letters

Appendix A.1 contains the following correspondence associated with the preparation of the Environmental Assessment

Letter to NRCS (Initial Consultation)	June 4, 2010
Letter from NRCS (Response)	June 11, 2010
Letter to HUD (Initial Consultation)	June 4, 2010
Letter to ODEQ (Initial Consultation)	June 4, 2010
Letter from ODEQ (Response/Information Request)	June 30, 2010
Letter to ODEQ (Additional Information Submittal)	Sept 9, 2010
Letter from ODEQ (Response/No Further Action Letter)	Oct 26, 2010
Letter to Oregon Department of Fish and Wildlife (Initial Consultation)	June 4, 2010



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

4 June 2010

Directorate of Public Works

Mr. Steven Fedje  
District Conservationist  
NRCS Portland Service Center  
2701 NW Vaughn Street, Suite 450  
Portland, Oregon 97210

Dear Mr. Fedje,

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (Sears USARC) in Portland, Oregon, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sgt. Jerome F. Sears USARC in Portland, OR and relocation to a new Armed Forces Reserve Center on Camp Withycombe, OR. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act of 1969* (NEPA) focuses on the closure, disposal and reuse of the Sears USARC.

The impact of the new AFRC on Camp Withycombe was addressed in a separate NEPA document.

Sears USARC is 4 acres in size and contains four buildings. The remainder of the site is covered in pavement (parking) or landscaped areas. Three alternatives are being considered for the Proposed Action and all would occur at the current location of the Sears USARC, located at 2731 SW Multnomah Boulevard in Portland, Oregon:

Alternative 1 is a No Action Alternative that will represent baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Sears USARC be closed, this is not a feasible alternative.

Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military use has ended, to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

---

Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred. Under this alternative, the Army would sell the property to the City of Portland via a negotiated sale and the property would be developed as a mixed-use affordable housing development, including attached single-family for sale homes, multi-family rental units, and a community services building with public outdoor spaces. Existing buildings would be demolished and properly disposed of.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
- Available technical information regarding these issues
- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at 206.301.2177 or at [meline.skeldon@us.army.mil](mailto:meline.skeldon@us.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works, Environmental Division

Enclosure

---

-----Original Message-----

From: Fedje, Steve - Portland, OR [mailto:Steve.Fedje@or.usda.gov]  
Sent: Friday, June 11, 2010 11:18 AM  
To: Skeldon, Meline E Ms CTR 88TH RSC -NA-  
Subject: EA for Sears USARC

Meline,

I have reviewed the alternatives for the closure of the Sears USARC and have no issues as to our jurisdiction. The site is urban land and, therefore, not considered prime or unique farmland. Let me know if you need any more information.

Sincerely,

Steven D. Fedje  
District Conservationist  
USDA-NRCS  
2701 NW Vaughn St. Ste 450  
Portland, OR 97210  
503-326-3941 X102, Fax 503-326-3942

The squeaking of the pump sounds as necessary as the music of the spheres.  
Thoreau

Classification: UNCLASSIFIED  
Caveats: FOUO



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

4 June 2010

Directorate of Public Works

Mr. Roy Schull  
U.S Department of Housing and Urban Development,  
Portland Field Office  
400 SW 6th Avenue  
Suite 700  
Portland, OR 97204-1632

Dear Mr. Schull,

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (Sears USARC) in Portland, Oregon, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sgt. Jerome F. Sears USARC in Portland, OR and relocation to a new Armed Forces Reserve Center on Camp Withycombe, OR. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* of 1969 (NEPA) focuses on the closure, disposal and reuse of the Sears USARC. The impact of the new AFRC on Camp Withycombe was addressed in a separate NEPA document.

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Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

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Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred. Under this alternative, the Army would sell the property to the City of Portland via a negotiated sale and the property would be developed as a mixed-use affordable housing development, including attached single-family for sale homes, multi-family rental units, and a community services building with public outdoor spaces. Existing buildings would be demolished.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
- Available technical information regarding these issues
- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at 206.301.2177 or at [meline.skeldon@us.army.mil](mailto:meline.skeldon@us.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

4 June 2010

Directorate of Public Works

Mr. Dick Pederson  
Director  
Oregon Dept. of Environmental Quality  
811 W. Sixth Ave  
Portland, OR 97204

Dear Mr. Pederson,

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (Sears USARC) in Portland, Oregon, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sgt. Jerome F. Sears USARC in Portland, OR and relocation to a new Armed Forces Reserve Center on Camp Withycombe, OR. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* of 1969 (NEPA) focuses on the closure, disposal and reuse of the Sears USARC. The impact of the new AFRC on Camp Withycombe was addressed in a separate NEPA document.

Sears USARC is 4 acres in size and contains four buildings. The remainder of the site is covered in pavement (parking) or landscaped areas. Three alternatives are being considered for the Proposed Action and all would occur at the current location of the Sears USARC, located at 2731 SW Multnomah Boulevard in Portland, Oregon:

Alternative 1 is a No Action Alternative that will represent baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Sears USARC be closed, this is not a feasible alternative.

Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

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Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred. Under this alternative, the Army would sell the property to the City of Portland via a negotiated sale and the property would be developed as a mixed-use affordable housing development, including attached single-family for sale homes, multi-family rental units, and a community services building with public outdoor spaces. Existing buildings would be demolished.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
- Available technical information regarding these issues
- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at 206.301.2177 or at [meline.skeldon@us.army.mil](mailto:meline.skeldon@us.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures

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From: MILLER Sarah [<mailto:MILLER.Sarah@deq.state.or.us>]  
Sent: Wed 6/30/2010 2:40 PM  
To: Skeldon, Meline E Ms CTR 88TH RSC -NA-  
Cc: GILLES Bruce A  
Subject: Sears USARC Information Request

Hello-

Thank you for your letter regarding the Sears USARC at 2731 SW Multnomah Blvd, Portland OR closure plans. DEQ identified two environmental issues identified on the site.

1. A reported release from a leaking underground storage tank(LUST) Log Number 26-93-6051 was sent to DEQ in 1993- there has been no updates to DEQ as to whether this release has been assessed-DEQ records indicated that assessment/cleanup was necessary.
2. This facility is also listed as a Hazardous Waste Generator(EPA ID: OR6210400069) sampling may be necessary to confirm no hazardous releases have impacted the site.

For more specific information please visit the DEQ Facility Profiler:

Main Page: <http://deq12.deq.state.or.us/fp20/StartPage.aspx>

Click on address and type in the facility address.

If you have other questions, please let me know-

Thank you-

Sarah Miller

Oregon Department of Environmental Quality

Site Assessment/Clean-up Program

2020 SW 4th Avenue, Suite 400  
Portland, OR 97201-4987

Phone:503-229-5040

Fax: 503-229-6945

<http://www.deq.state.or.us/lq/cu/siteassessment/index.htm>



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54686

September 9, 2010

Directorate of Public Works

Ms. Edie McMorrine  
Heating Oil Tank Program  
Oregon Dept. of Environmental Quality  
1550 NW Eastman Pkwy, Suite 290  
Gresham, OR 97030

Dear Ms. McMorrine,

The United States Army Reserve, 88<sup>th</sup> Regional Support Command (RSC) is submitting the enclosed Report entitled "Final Field Report, Petroleum-Contaminated Soil Removal and Disposal Sears US Army Reserve Center (USARC)", prepared by Garry Struthers Associates, dated June 11, 1996 for your review in response to the open Leaking Underground Storage Tank file # 26-93-6051. The Sears USARC parcel was declared excess to mission requirements and directed that it should be closed per the Base Realignment and Closure legislation of 2005. The property will be transferred to the Local Redevelopment Authority, the draft Environmental Assessment document for this action as required by the *National Environmental Policy Act* of 1969 (NEPA) focuses on the closure, disposal and reuse of the Sears USARC.

The enclosed report is being submitted to you for your review in response to the June 30, 2010 email correspondence from your ODEQ Site Assessment/Clean-up Program office that, "A reported release from a leaking underground storage tank (LUST) Log Number 26-93-6051 was sent to DEQ in 1993- and that there has been no updates to DEQ as to whether this release has been assessed. DEQ records indicated that assessment/cleanup was necessary".

As was communicated by Ms. Meline Skeldon in a phone conversation with you on September 8, 2010 and as also documented in the Environmental Condition of Property for the site dated March 2007, Gary Struthers Associates, Inc (GSA) conducted the removal and disposal of petroleum-contaminated soil at the site in 1996. The report indicates that three heating oil USTs were historically located on the site, and all were removed in 1993. Contaminated soils were associated with the USTs, which were excavated in remedial efforts performed in May 1996. According to your records, the Oregon DEQ was never sent the 1996 remedial efforts by the Army Reserve; the 88<sup>th</sup> RSC also does not have record of these remedial efforts being sent to your office. According to the site records, a total of 98.21 tons of petroleum contaminated soil; 1,735 gallons of groundwater; and 30 gallons of mud were removed from the area north of the administration building. Upon conclusion of GSAs efforts to resolve the soil contamination, analytical results indicated that soil contamination remained at the site. The Total Petroleum Hydrocarbons-Diesel (TPH-D) soil sample results from the USARC are all above the clean-up standard of 100 parts per million for diesel (determined by ODEQ). Detectable concentrations of residual contaminants in groundwater were below regulatory designated cleanup standards. TCLP Lead, benzene, toluene, and ethylbenzene analysis results indicated non-detectable concentrations. Petroleum Contaminated Soil was left at the site, because the maximum

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amount of cubic yards of soil to be removed under the contract was reached at the site. A Vapor barrier was placed in the pit, which was then back-filled with clean sand. A 2 foot layer of soil was placed over the sand and the area was leveled and seeded. The soil samples collected at the Sears, also referred to as the Portland ARC (please disregard any reference to the Salem ARC within the GSA Report) that exceeded the cleanup criteria for diesel:

- POR-S-10-1 440PPM
- POR-S-10-1 380PPM (QA sample of POR-S-10-1)
- POR-S-10-2 160PPM (blind QC sample of POR-S-10-1)
- POR-W-10-1 110PPM

We have submitted the required \$200.00 review fee to your agency, and request that you please review the 1996 GSA Field Report and provide an opinion letter response at your earliest convenience. I would like to thank you in advance for your efforts. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at 206.301.2177 or at [meline.skeldon@us.army.mil](mailto:meline.skeldon@us.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosure



# Oregon

Thendare R. Kulungoski, Governor

## Department of Environmental Quality

Northwest Region - East Side Office  
1550 NW Eastman Parkway, Suite 290  
Gresham, OR 97030  
(503) 667-8414  
Fax: (503) 674-5148

October 26, 2010

MELINE SKELDON, BRAC ENVIRONMENTAL COORDINATOR  
US ARMY RESERVE 88<sup>TH</sup> RSC  
60 SOUTH O STREET  
FORT MCCOY WISCONSIN 54656

RE: US Army Reserve Center  
File # 26-93-6051

Dear Ms Skeldon:

The Department of Environmental Quality has completed its review of the information submitted to date regarding the underground heating oil tank (HOT) decommissioning and cleanup conducted at 2731 SW Multnomha Blvd in Portland, Oregon. The Department has determined that the site appears to be cleaned up in accordance with Oregon Administrative Rules (OAR) 340-122-205 through -360, and that no further action is required at this time.

This determination is a result of our evaluation and judgment based on the regulations and facts as we now understand them, including:

1. One 10,000 gallon and two 675 gallon HOTs were decommissioned by removal.
2. Approximately 98.21 tons of diesel contaminated soil was excavated and recycled at TPS Technologies landfill.
3. Approximately 1,735 gallons of groundwater and 30 gallons of mud were removed by Marine Vacuum Service Inc. Two groundwater samples were collected and analyzed for diesel, BTEX and Pahs. Diesel was discovered at a maximum of 0.4 ppm. No constituents of concern were detected above respective RBCs.
4. After soil excavation was complete, diesel contamination was detected, and the highest level of diesel contamination detected in soil was 440 parts per million (ppm) which is below the sites level II cleanup standard of 500 ppm.

The Department's determination will not be applicable if new or undisclosed facts show that the cleanup does not comply with the referenced rules. The Department's determination also does not apply to any conditions at the site other than the release of the petroleum product specifically addressed in your report.



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Page 2  
US Army Reserve Center  
26-93-6051

Please note that pursuant to OAR 340-122-360 (2), a copy of this report must be retained until ten (10) years after the first transfer of the property. We recommend that a copy of this information be maintained with the permanent property records.

Your efforts to comply with Oregon's environmental rules and regulations to ensure that your site has been adequately cleaned up are appreciated. If you have any questions, please feel free to contact me at (503) 667-8414 ext 55011.

Sincerely,



Tim Brown  
HOT Project Manager



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

4 June 2010

Directorate of Public Works

Ms. Misch Connine  
Habitat Biologist  
North Willamette Watershed Office  
Oregon Dept. of Fish and Wildlife  
18330 NW Sauvie Island Rd.  
Portland, OR 97231

Dear Ms Connine,

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (Sears USARC) in Portland, Oregon, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sgt. Jerome F. Sears USARC in Portland, OR and relocation to a new Armed Forces Reserve Center on Camp Withycombe, OR. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act of 1969* (NEPA) focuses on the closure, disposal and reuse of the Sears USARC.

The impact of the new AFRC on Camp Withycombe was addressed in a separate NEPA document.

Sears USARC is 4 acres in size and contains four buildings. The remainder of the site is covered in pavement (parking) or landscaped areas. Three alternatives are being considered for the Proposed Action and all would occur at the current location of the Sears USARC, located at 2731 SW Multnomah Boulevard in Portland, Oregon:

Alternative 1 is a No Action Alternative that will represent baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Sears USARC be closed, this is not a feasible alternative.

Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military use has ended, to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those

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## A.2 SHPO/ACHP - Section 106 Consultation

Appendix A.2 contains the following correspondence associated with the preparation of the Environmental Assessment and coordination with the SHPO and Indian Tribes

Letter to Oregon SHPO (Initial Consultation)	July 26, 2010
Letter from Oregon SHPO (Response)	August 9, 2010
Letter to Oregon SHPO (Determination of Eligibility/Effect)	August 12, 2010
Letter from Oregon SHPO (Response)	August 26, 2010
Letter (Email) to SHPO (Additional Information)	September 14, 2010
Letter from SHPO (Response)	September 22, 2010
Letter to the ACHP	December 10, 2010
Letter from ACHP (Response)	December 20, 2010
Letter to Oregon SHPO (Draft MOA)	December 30, 2010
Letter from SHPO (Response)	January 13, 2011
Email to Oregon SHPO (RE: Revised MOA)	January 25, 2011
Letter to Burns Paiute Tribe (Initial Consultation)	July 26, 2010
Letter to Burns Paiute Tribe (Determination of Eligibility/Effect)	January 31, 2011
Letter to Confederated Tribes of Grande Ronde Community of Oregon (Initial Consultation)	July 26, 2010
Letter to Confederated Tribes of Grande Ronde Community of Oregon (Determination of Eligibility/Effect)	January 31, 2011
Letter to Confederated Tribes of Siletz Reservation (Initial Consultation)	July 26, 2010
Letter (Email) from Siletz Tribe (Response)	August 6, 2010
Letter to Confederated Tribes of Siletz Reservation (Determination of Eligibility/Effect)	January 31, 2011
Letter to Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (Initial Consultation)	July 26, 2010
Letter to Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (Determination of Eligibility/Effect)	January 31, 2011
Letter to Confederated Tribes of the Umatilla Indian Reservation (Initial Consultation)	July 26, 2010
Letter to Confederated Tribes of the Umatilla Indian Reservation (Determination of Eligibility/Effect)	January 31, 2011

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Letter to Confederated Tribes of the Warm Springs Reservation (Initial Consultation)	July 26, 2010
Letter to Confederated Tribes of the Warm Springs Reservation (Determination of Eligibility/Effect)	January 31, 2011
Letter to Coquille Indian Tribe (Initial Consultation)	July 26, 2010
Letter to Coquille Indian Tribe (Determination of Eligibility/Effect)	January 31, 2011
Letter to Cow Creek Band of Umpqua Tribe of Indians (Initial Consultation)	July 26, 2010
Letter to Cow Creek Band of Umpqua Tribe of Indians (Determination of Eligibility/Effect)	January 31, 2011
Letter to Klamath Tribes (Initial Consultation)	July 26, 2010
Letter to Klamath Tribes (Determination of Eligibility/Effect)	January 31, 2011



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Mr. Tim Wood  
State Historic Preservation Officer  
Oregon Parks and Recreation Department  
725 Summer Street, NE Suite C  
Salem, OR 97301

Dear Mr. Wood:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon.

In following with BRAC Army policy, effects to cultural resources as a result of the proposed BRAC recommendation will be considered in strict accordance with National Environmental Policy Act (NEPA), as amended, Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended in 2006, and its implementing regulations, 36 CFR 800; Archeological and Historic Preservation Act of 1974; Native American Graves Protection and Repatriation Act of 1990; Executive Order 11593; Council on Environmental Quality Regulations (40 CFR 1500-1508); and Environmental Analysis of Army Actions (32 CFR Part 651). The Environmental Assessment (EA) document for this action, as required by NEPA, focuses on the closure, disposal and reuse of the Sears USARC.

The Sergeant Jerome F. Sears USARC is located at 2731 SW Multnomah Boulevard in Portland, Oregon (Section 20, Township 1 South, Range 1 East; 45° 27' 57.6" N; 122° 42' 18.4" W; Figures 1 and 2). The project area is 4 acres in size and contains four buildings: an administration building (Sears Hall), an organizational maintenance shop (OMS) building (labeled AMSA [Area Maintenance Support Activity] on Figure 5), a storage building, and a three-sided hazardous material storage structure (Figures 3 and 5). The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

Three alternatives are being considered for the EA and all would occur at the current location of the Sergeant Jerome F. Sears USARC. Alternative 1 is a No Action Alternative that will

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represent baseline conditions at the property; no change from the current activities would occur under this alternative. Alternative 2 is a Caretaker Status Alternative where the 88th RSC would secure the property, ensure public safety, implement maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. Under this alternative, the Army, via a negotiated sale, would sell the property to be developed as a mixed-use affordable housing development (Figure 4). Current buildings at the facility would likely be demolished.

The Area of Potential Effects (APE) for this project consists of the current boundaries of the Sears USAR facility, including the four buildings, paved and landscaped areas on the property (Figures 2, 3, and 5).

The 88<sup>th</sup> RSC is conducting appropriate data collection activities to determine the presence of resources eligible for listing in the National Register of Historic Places and, pursuant to 36 CFR 800, the 88<sup>th</sup> RSC will consult with your office throughout this process. As part of the early coordination and NEPA scoping process, we are identifying key issues that will need to be addressed as part of this study. Please provide your comments relative to the following three topics:

- Specific issues or geographic areas of concern, based on your expertise or regulatory jurisdiction.
- Available technical information regarding these issues.
- Mitigation or permitting requirements that may be necessary for project implementation.

The 88th RSC is aware that Native American and other cultural groups may have concerns related to cultural resources, and consultation will be conducted with federally recognized tribes. We anticipate submitting a Determination of Eligibility to your office for review and concurrence by mid August 2010.

We look forward to working with you or your designated representative. If you have questions or concerns pertaining to this correspondence, please contact Ms. Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures



**Oregon**

Theodore R. Kalongoski, Governor

**Parks and Recreation Department**

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

[www.oregonheritage.org](http://www.oregonheritage.org)

August 09, 2010

Chief David Moore  
USAR 88th Regional Support Command  
60 S 9 St  
Ft. McCoy, WI 54656



RE: SHPO Case No. 10-1814  
Sears US Army Reserve Cntr Proj  
FOE/closure, disposal and reuse  
Dept of the Army  
1S 1E 20 (2371 SW Multnomah Blvd), Portland, Multnomah County

Dear Chief Moore:

Our office recently received a request to review the proposal for the project referenced above. In checking our statewide cultural resource database, I find that there have been no previous cultural resource surveys completed near the proposed project area. However, the project area lies within an area generally perceived to have a high probability for possessing archaeological sites and/or buried human remains.

While not having sufficient knowledge to predict the likelihood of cultural resources being within your project area, extreme caution is recommended during future ground disturbing activities. ORS 358.905 and ORS 97.740 protect archaeological sites and objects and human remains on state public and private lands in Oregon. If any cultural material is discovered during construction activities, all work should cease immediately until a professional archaeologist can assess the discovery. If your project has a federal nexus (i.e., federal funding, permitting, or oversight) please coordinate with your federal agency representative to ensure that you are in compliance with Section 106 of the NHPA.

If you have any questions about my comments or would like additional information, please feel free to contact our office at your convenience. In order to help us track your project accurately, please be sure to reference the SHPO case number above in all correspondence.

Dennis Griffin, Ph.D., RPA  
State Archaeologist  
(503) 986-0674  
[dennis.griffin@state.or.us](mailto:dennis.griffin@state.or.us)



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

August 12, 2010

Directorate of Public Works

Mr. Tim Wood  
State Historic Preservation Officer  
Oregon Parks and Recreation Department  
725 Summer Street, NE Suite C  
Salem, OR 97301

Dear Mr. Wood:

This letter is in reference to SHPO Case No. 10-1814. As stated in a letter to your agency dated July 26, 2010, the Defense Base Realignment and Closure (BRAC) Commission has recommended the closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (USARC). To implement this recommendation, the US Army proposes the transfer and sale of this property from Government ownership for local reuse and development as a mixed-use affordable housing development after closure. The Oregon SHPO Clearance Form for this project is provided as Enclosure 1 of this correspondence.

The Sergeant Jerome F. Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sergeant Jerome F. Sears USARC, including the four buildings, and paved and landscaped areas on the parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA) the US Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). After applying the NRHP criteria for evaluating properties, the 88<sup>th</sup> RSC has determined that there are no NRHP-eligible resources within the APE and no historic properties will be affected by the proposed undertaking.

Additional information on the proposed undertaking, the APE, identification efforts and determination of effects are provided in the enclosed Oregon SHPO Clearance Form (Enclosure 1) and Section 106 Review Summary (Enclosure 2).

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At this time, the 88<sup>th</sup> RSC requests that you review the enclosed information pursuant to Section 106 of the NHPA. We would appreciate your comments and are requesting concurrence with our determination of no effect within 30 calendar days of receipt of this letter. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division

Enclosure

## OREGON SHPO CLEARANCE FORM

*Do not use this form for ODOT or Federal Highway projects or to record archaeological sites*

This form is for: <b>federal</b> cultural resource reviews (Section 106); <b>state</b> cultural resource reviews (ORS 358.653)						
<b>SECTION 1: PROPERTY INFORMATION</b>			<b>SHPO Case Number: 10-1814</b>			
Street Address: 2731 SW Multnomah Boulevard						
City: Portland			County: Multnomah			
Agency Project #			Project Name Closure of Sgt. Jerome F. Sears US Army Reserve Center			
<i>If there is not a street address, include the Township, Range, and Section, cross streets, or other address description</i>						
Owner:		<input type="checkbox"/> Private	<input type="checkbox"/> Local Gov	<input type="checkbox"/> State Gov	<input checked="" type="checkbox"/> Federal Gov	<input type="checkbox"/> Other
Are there one or more buildings or structures?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If no, skip to Section 2 and append photo(s)				
Is the property listed in the National Register of Historic Places?		<input type="checkbox"/> YES – Individually <input type="checkbox"/> YES – In a district <input checked="" type="checkbox"/> NO				
Construction date: 1960		<input type="checkbox"/> Check box if date is estimated				
Siding Type(s) and Material(s): Concrete Block/Brick			Window Type(s) and Material(s): Awning, Metal			
Has the property been physically altered?		<input type="checkbox"/> No Alterations <input checked="" type="checkbox"/> Few Alterations <input type="checkbox"/> Major / Many Alterations				
<b>SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY</b> - Check the appropriate box						
<i>The purpose of this review is to avoid impacts to properties that are "eligible" (historic) or already listed in the National Register of Historic Places. Fully establishing historic significance can be very costly and time consuming. Therefore initial evaluations are based on age (50 years or greater) and integrity (historic appearance), which are the minimum qualifications for listing in the National Register. Additional documentation may be needed further in the process, but typically initial evaluations allow the review process to proceed expeditiously.</i>						
<input type="checkbox"/> The property is considered <b>Eligible</b> at this time because it is already listed in the National Register <b>or</b>						
<ul style="list-style-type: none"> <li>• is at least 50 years old <b>and</b> retains its historic integrity (minimal alterations to key features)</li> <li>• has potential significance (architectural or historical)</li> </ul>						
<input checked="" type="checkbox"/> The property is considered <b>Not Eligible</b> at this time because it:						
<ul style="list-style-type: none"> <li>• is less than 50 years old <b>or</b> is 50 years or older but there have been major alterations to key features</li> <li>• is known to have no significance, based on National Register-level documentation and evaluation</li> </ul>						
<b>SECTION 3: APPLICANT DETERMINATION OF EFFECT</b> - Check the appropriate box						
<input checked="" type="checkbox"/> The project has <b>NO EFFECT</b> on a property that is eligible or already listed in the National Register, either because there is no eligible property involved or the eligible property will not be impacted physically or visually.						
<input type="checkbox"/> The project will have a minor impact on a property that is eligible or already listed in the National Register, and therefore there is <b>NO ADVERSE EFFECT</b> . Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.						
<input type="checkbox"/> The project will have a major impact on a property that is eligible or already listed in the National Register, therefore there is an <b>ADVERSE EFFECT</b> . Major impacts include full or partial demolition, complete residing, full window replacement, etc.						
<b>STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only</b>						
<b>Eligibility:</b>		<input type="checkbox"/> Concur with the eligibility determination above.				
		<input type="checkbox"/> Do not concur with the eligibility determination above.				
<b>Effect:</b>		<input type="checkbox"/> Concur with the effect determination above.				
		<input type="checkbox"/> Do not concur with the effect determination above.				
Signed: _____			Date: _____			
<b>RECEIVED STAMP</b>						
<b>CONTACT INFORMATION STAMP</b>						
Comments:						

## OREGON SHPO CLEARANCE FORM

*Do not use this form for ODOT or Federal Highway projects or to record archaeological sites*

<b>SECTION 4: PREVIOUS ALTERATIONS TO THE BUILDING OR STRUCTURE</b>	
<i>Only complete this section for buildings that are 50 years old or older. Describe any alterations that have already occurred to the building, such as material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Provide estimated dates for the work. Attach additional pages as necessary.</i>	
Alterations at Sears Hall include the addition of a kitchen to the rear wing (drill hall) of the administration building, appearing in engineering drawings by 1991; the addition spans the length of the wing, on the west elevation. The kitchen was further renovated in 2002 and 2004 for use as office and storage space. Additional renovations to Sears Hall included replacement of the heater, boiler, roof, and improvements to the electrical system. Windows may also have been replaced over time.	
The Sears USARC exhibits a major alteration to one of the character-defining features of this property type identified in the Historic Context study. The original metal and glass main entrance assembly specified in the standardized plans has been infilled or replaced with an inset solid masonry wall finished with mosaic tile on the exterior. The modified entrance is pierced by one set of double doors, two plate glass windows on either side of the doors, and two one-over-one light awning windows above the doors.	
<b>SECTION 5: PROJECT DESCRIPTION</b>	
<i>Describe what work is proposed, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.</i>	
The Defense Base Realignment and Closure (BRAC) Commission has recommended the closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (USARC). To implement this recommendation, the Army proposes the transfer and sale of this property from Government ownership for local reuse and development as a mixed-use affordable housing development after closure.	
<b>SECTION 6: AGENCY CONTACT INFORMATION</b>	
Name of State <b>AND/OR</b> Federal Agency Funding the Project: U.S. Army Reserves	
Name of Organization Submitting the Project: 88 <sup>th</sup> Regional Support Command	
Project Contact Name and Title: Meline Skeldon, Environmental Protection Specialist/JMWA, 88 <sup>th</sup> Regional Support Command, Directorate of Public Works	
Street Address, City, Zip: 60 South O Street, Fort McCoy, Wisconsin 54656	
Phone: 206 301-2177	Email: meline.skeldon@usar.army.mil
<b>SECTION 7: ATTACHMENTS</b>	
<b>REQUIRED</b>	<input checked="" type="checkbox"/> 3 – 4, color, 4 x 5 photographs of the subject property, digital or print. One photo is sufficient for vacant property
<b>AS NEEDED</b> <i>Contact SHPO staff with questions</i>	<input type="checkbox"/> Project area map, for projects including more than one tax lot
	<input type="checkbox"/> Additional drawings, reports, or other relevant materials
	<input type="checkbox"/> Continuation sheet for sections 4 or 5, or additional context to determine National Register Eligibility.
<b>SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem, OR 97301</b> <b>Documents meeting all aspects of the digital submission policy may submit by email to</b> <b>ORSHPO.Clearance@state.or.us</b>	

# OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

Do not use this form for ODOT, Federal Highway projects or to record archeological sites

## CONTINUATION SHEET

- Include additional documentation for Section 4 or 5 as necessary. Attach maps, drawings, and reports as needed to illustrate current conditions and the planned project. If submitting this form by email, photos and maps may be inserted into continuation sheets.
- If completing a complete Determination of Eligibility (DOE) or Finding of Effect (FOE), use continuation sheets as necessary or include appendices.

### Photos



Figure 1: Main (south) and east elevations of the Sergeant Jerome F. Sears USARC, facing northwest.



Figure 2. Main (south) elevation of the Sears USARC, facing east, showing brick veneer exterior and metal awning-style windows.

**OREGON SHPO CLEARANCE FORM  
CONTINUATION SHEET**

*Do not use this form for ODOT, Federal Highway projects or to record archaeological sites*



Figure 3. Main (south) elevation of the Sears USARC, facing north, showing main entrance, modified from the standardized plans for this building type.



Figure 4. Main (south) elevation of the Sears USARC, facing west, showing building exterior west of main entrance.

**OREGON SHPO CLEARANCE FORM  
CONTINUATION SHEET**

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Figure 5. West elevation of the Sears USARC showing (from right to left), rear wing for drill/assembly space, one-story hyphen and rear of main block, facing east.



Figure 6. West elevation showing the addition to the rear wing, clerestory lights on the original rear wing visible above.

## OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

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Figure 7. East elevation of the rear wing, hyphen and rear (north) elevation of the main block of the Sears USARC, facing west.



Figure 8: East and north elevations of the main block of the Sears USARC.

**OREGON SHPO CLEARANCE FORM  
CONTINUATION SHEET**

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Figure 9. Main elevation of the Organizational Maintenance Shop (OMS) in the Sears USARC complex.



Figure 10. Modern three-sided storage shed for hazardous materials at the Sears USARC complex.

**OREGON SHPO CLEARANCE FORM  
CONTINUATION SHEET**

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Figure 11. Modern storage shed on the west side of the Sears USARC complex.

# OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

Do not use this form for ODOT, Federal Highway projects or to record archaeological sites

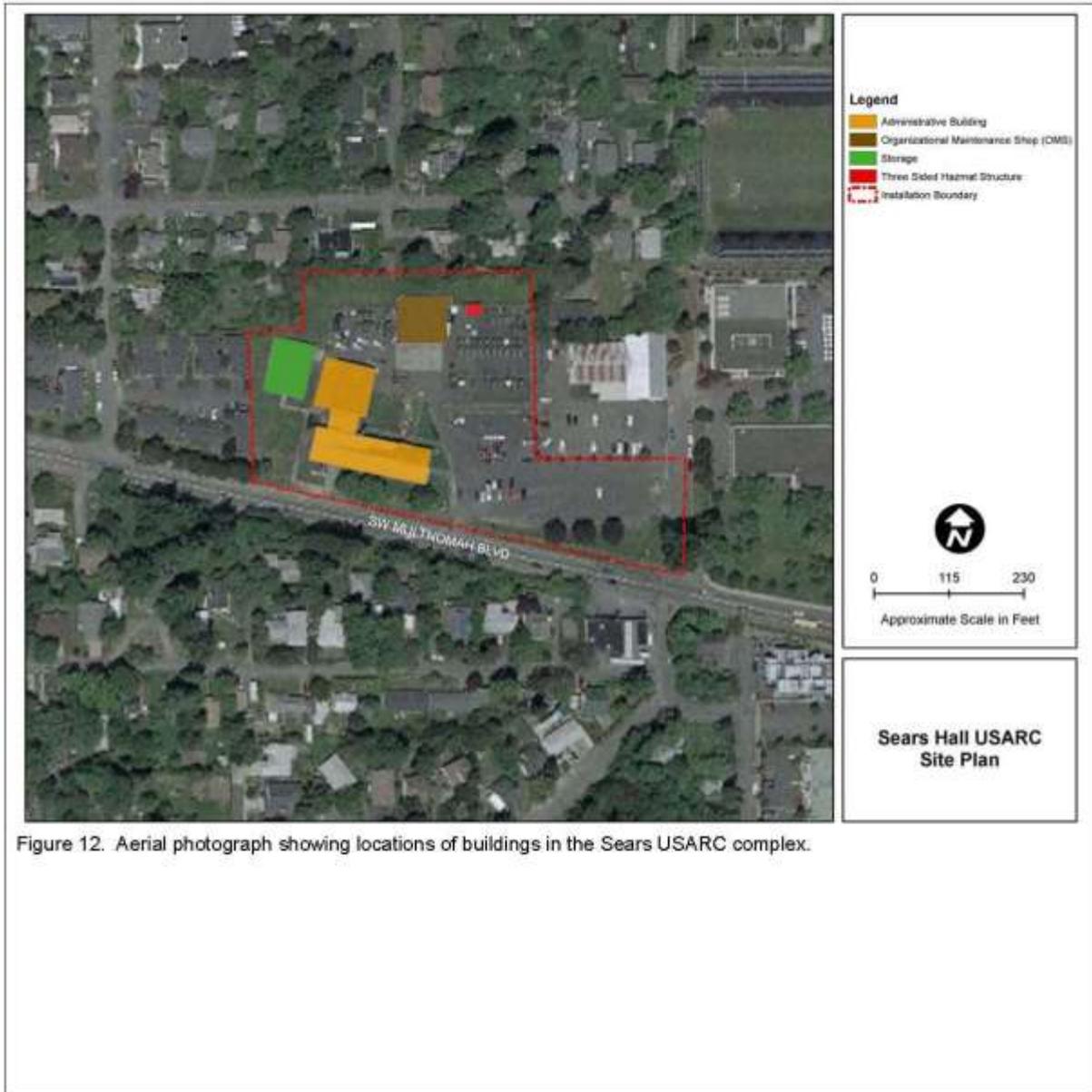


Figure 12. Aerial photograph showing locations of buildings in the Sears USARC complex.

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# OREGON SHPO CLEARANCE FORM INSTRUCTIONS

*Do not use this form for ODOT, Federal Highway projects or to record archaeological sites*

## SECTION 1: PROPERTY INFORMATION:

- Include complete address and agency project number and name, if applicable.
- Check YES if there are any buildings on the site. Check NO if it is a vacant parcel (in which case it will be evaluated for archaeology and the potential impact on surrounding buildings only.)
- Check YES if your research (look on our website at <http://heritagedata.prd.state.or.us/historic/> and/or call your local planning office) shows the property is listed. Check NO if you find that it is not listed.
- Fill in the construction date. Check box if date is estimated.
- Describe the siding and window types and materials. Examples: double hung wood windows; vertical wood siding.
- Check to what degree the property has been altered. Ask yourself, would the original owner recognize the building, or have there been many changes that obscure the historic features?

## SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY:

- Check the ELIGIBLE box if the building is listed (National Register OR Local landmarks register), has previously been evaluated as eligible, or is 50 years of age AND the majority of the exterior historic features are retained.
- Check the NOT ELIGIBLE box if the building is not yet 50 years old, or if in your opinion there have been many and/or major changes (e.g. additions, siding and/or window replacement, porch enclosures).
- Applicants who acknowledge that the property meets the minimum qualifications for listing in the National Register but choose to contest this determination must complete a Determination of Eligibility (DOE). The DOE must demonstrate that the property is not eligible for the National Register using the Criteria listed in National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation." The DOE may be submitted on continuation sheets or as a separate document.

## SECTION 3: APPLICANT DETERMINATION OF EFFECT:

- Check the NO EFFECT box if the property is NOT ELIGIBLE for listing in the National Register or if the work will not replace or alter the appearance of any of the building's exterior features.
- Check the NO ADVERSE EFFECT box if the property is ELIGIBLE for listing or is already listed in the National Register and the work is visible (e.g. re-roofing with same materials, window or siding repair, adding a vent) but will not remove or obscure historic features.
- Check ADVERSE EFFECT if the property is ELIGIBLE or listed in the National Register and the work includes major changes, such as replacing the siding or windows.

## SECTION 4: PREVIOUS ALTERATIONS

- List the changes that already occurred to the building, including siding, windows, doors, porches, additions including dormers, or if the property was moved. Include the approximate date of each alteration. The information can be provided in list format.

## SECTION 5: PROJECT DESCRIPTION:

- Clearly describe what is being repaired or replaced, and how that work will be done. What materials and installation process are proposed? Include sufficient information (e.g. close-up photos, product specification sheets) so we can compare what exists with what is proposed. The information can be provided in list format.

## SECTION 6: AGENCY CONTACT INFORMATION:

- If applicable, list the federal **AND/OR** state agency funding the project, whichever is applicable.
- If different than the funding agency, list the name of the organization submitting the Clearance Form

## ATTACHMENTS:

- Photos: Include photos of the entire building, especially the elevations that can be seen from the street. Include close-ups of features that will be impacted by the project.
- Additional Information: When applicable, include window specifications, plans or diagrams that illustrate pertinent existing conditions and/or proposed work
- Continuation sheets for additional Section 4 or 5 narrative or to append a formal Determination of Eligibility (DOE) or Finding of Effect (FOE). These materials may also be submitted as a separate document.

## Enclosure 2: Section 106 Review Summary

### Description of Proposed Undertaking

On September 8, 2005, the Defense Base Realignment and Closure (BRAC) Commission recommended closure of the Sergeant Jerome F. Sears United States (US) Army Reserve Center (USARC) in Portland, Oregon. This recommendation was approved by the President on September 23, 2005, and forwarded to Congress. Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law.

As documented in an Environmental Assessment (EA), the US Army is considering two courses of action, in addition to a No Action alternative, to implement the BRAC requirement: 1) reducing maintenance levels on the complex to caretaker status until it can be transferred out of federal ownership; and 2) transferring the USARC out of federal ownership through the negotiated sale of the property to the City of Portland for demolition of the existing Sears USARC buildings and the construction of mixed multifamily units, single-family townhomes, a support center, and open space.

### Area of Potential Effects

The Sergeant Jerome F. Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon, covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sergeant Jerome F. Sears USARC, including the four buildings, and paved and landscaped areas on the parcel.

### Previous Efforts to Identify Historic Properties

No cultural resources investigations have been previously conducted at the Sears USARC. The archaeological site files search indicated that no previously recorded archaeological sites are located on the grounds of the Sears USARC. In addition, no NRHP-listed resources are located on the Sears USARC.

### Recent Efforts to Identify Historic Properties

**Archaeological Resources.** No previous archaeological surveys have been conducted and no archaeological resources have been identified at the Sears USARC. The potential for NRHP-eligible archaeological sites is considered low for the Sears USARC parcel based on possible site types and previous disturbance. Based on an analysis of historical topographic maps, the Sears USARC parcel is located near the heads of two small drainages. Small prehistoric sites such as hunting stands or limited use activity areas may be associated with this type of upland location. Based on an analysis of historical topographic maps and aerial photographs, no historical



structures were located on the five parcels originally purchased for the Sears USARC. The 1915 and 1930 Sanborn maps show the western portion of the Sears USARC parcel undeveloped. Sanborn maps of the eastern portion of the parcel, on the east side of the former 26th Street, were not available. Three pre-1970 residential structures are located immediately north of the Sears USARC; it is possible that minimal historical activity, such as refuse disposal or refuse burning occurred near the lot boundaries of each of these residences. These types of small archaeological sites, prehistoric limited activity areas and historical refuse scatters have very limited data potential and are not likely to be considered eligible for the NRHP.

Previous disturbance on the parcel includes the original construction of the Sears USARC, including the main administration building, the OMS, and parking and landscaped areas by 1960, as well as the more recent additions of storage sheds and renovations to the main building. Original grading of the parcel resulted in both cut and fill areas with an average elevation change of 2 feet or less. This previous disturbance has diminished the potential for intact archaeological resources to be located on the parcel. At present, only narrow strips of grassy or landscaped areas, comprising approximately 1.6 acres, occur on the Sears USARC.

**Architectural Resources.** The two buildings in the APE were constructed in 1960 and have not been previously evaluated for NRHP eligibility. In 2008, Hardy Heck, Moore (HHM), Inc. prepared *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* for the Department of Defense Legacy Resource Management Program. A copy of this study is provided on the attached compact disk (CD) for your files (Attachment 1). The study identified and categorized the various property types associated with the historical development of U.S. Army Reserve Centers, concentrating on the post World War II and early Cold War eras, and provides a historic context that can be used to evaluate them for eligibility for listing in the NRHP. Property types associated with the Early Cold War period were further divided into three categories by plan type and named accordingly as the "Compact Plan," the "Sprawling Plan," and the "Vertical Plan." The study further stipulated the character-defining features that must be present for an Army Reserve Center constructed according to standardized plans to retain its integrity and convey its significance as an exemplar of its property type. Examples of these required character-defining features include the original building footprint, original number of stories, original fenestration pattern, and original exterior finish. The document does not evaluate individual Army Reserve Centers; however, the guidelines for evaluation have been followed to evaluate the NRHP eligibility of the Sears USARC.

The buildings at the Sears USARC are concrete block and brick construction on concrete slab. The plan or footprint of the 24,104-square-foot Sears Hall is an asymmetrical T. The main two-story block forms the top portion of the T and has a shallow pitched gable roof with parapet walls on the side (east and west) elevations; the main (south) elevation faces the street. The main block is connected, via a one-story hyphen, to a double-height rear wing with clerestory lights on the side elevations. The main block is used for administrative and classroom space while the rear wing is a drill or assembly hall. Alterations at Sears Hall include the addition of a kitchen to the rear wing (drill hall) of the administration building, appearing in engineering drawings by 1991; the addition spans the length of the wing, on the west elevation. The kitchen was further renovated in 2002 and 2004 for use as office and storage space. Additional



renovations to Sears Hall included replacement of the heater, boiler, roof, and improvements to the electrical system. Windows may also have been replaced over time.

The OMS building is situated on the northern portion of the parcel and consists of a 4,669 square foot single-story brick structure. The front (main) elevation is pierced by three vehicle service bays with roll-up metal doors. The OMS appears as “maintenance shop” on a general layout that included the main administration building dating to the period of original construction.

The Sears USARC is based on standardized plans for US Army Reserve Centers categorized in the Historic Context Study as the “Sprawling Plan” within the Early Cold War property type. Standardized plans for this property type were initially developed by the architectural firm of Reisner and Urbahn in 1952, updated in 1953, and last revised by the successor firm of Urbahn, Brayton, and Burrows in 1956, in collaboration with the USACE. Known examples of this plan type were constructed from 1953 through 1964, possibly continuing later, by the Army at reserve facilities across the country (Moore et al. 2008).

Because buildings categorized in the Sprawling Plan sub-type are part of a nationwide building program and are common throughout the United States, a strict set of guidelines to examine their physical integrity through the presence of unaltered character-defining features, as identified in the Historic Context study (Moore et al. 2008) was established to identify the most intact and representative examples of this property type.

The Sears USARC exhibits a major alteration to one of the character-defining features of this property type identified in the Historic Context study. The original metal and glass main entrance assembly specified in the standardized plans has been infilled or replaced with an inset solid masonry wall finished with mosaic tile on the exterior. The modified entrance is pierced by one set of double doors, two plate glass windows on either side of the doors, and two one-over-one light awning windows above the doors. Although other features at this facility remain unaltered or have been replaced with architecturally compatible materials, the guidelines stipulate that all character-defining features must be retained for the building to be considered eligible for the NRHP. Applying these guidelines for evaluation from the Historic Context study of U.S. Army Reserve Centers, the Sears USARC is not considered eligible for listing in the NRHP.

Because an OMS is a support structure for the main Army Reserve center and lacks sufficient historical associations and/or design qualities on its own to meet any of the NRHP Criteria for eligibility, an OMS is not likely to be eligible on its own for inclusion on the NRHP. Furthermore, the historic context study indicates that “if the associated Army Reserve Center lacks significance or integrity to be eligible for the NRHP, the [OMS] likewise is not eligible”. Because the Sears USARC main building is not considered eligible for the NRHP, neither is the associated OMS considered eligible for the NRHP.

#### Native American Concerns

Consultation with nine Native American groups (Burns Paiute Tribe, Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, Confederated Tribes of Grand Ronde Community of Oregon, Confederated Tribes of Siletz Reservation, Confederated Tribes of the Umatilla Indian



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Enclosure 2: Section 106 Review Summary

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Reservation, Confederated Tribe of the Warm Springs Reservation, Coquille Indian Tribe, Cow Creek Band of Umpqua Tribe of Indians, and Klamath Tribes) and the Oregon Commission on Indian Services was initiated on July 27, 2010 for the current proposed project at the USARC. Native American resources or concerns have not been identified in the project area although consultation is ongoing.

Effects to Historic Properties

No NRHP-eligible archaeological or architectural resources have been identified within the APE. No historic properties will be affected by the proposed undertaking.

Attachments:

1. Electronic copy on CD of *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Moore et al. 2008)

Prepared by:

Rachael Mangum, Parsons, Cultural Resources Specialist  
B.A. Anthropology, M.A., Anthropology

Susan Bupp, Parsons, Cultural Resources Specialist  
B.A. Anthropology, M.A. Anthropology





Oregon

Theodore R. Kulongoski, Governor

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

[www.oregonheritage.org](http://www.oregonheritage.org)

August 26, 2010

Ms. Melanie Skeldon  
USAR 88th Regional Support Command  
60 South O St  
Fort McCoy, WI 54656



RE: SHPO Case No. 10-1814  
Sears US Army Reserve Center Project  
1S 1E 20 (2371 SW Multnomah Blvd), Portland, Multnomah

Dear Ms. Skeldon:

Thank you for your submission of documentation on the project referenced above. We appreciate receiving the *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers*. This is an excellent document that provides valuable information.

This context allowed us to understand the architectural merits of Sears Hall, and compare it to another Reserve Center in Portland located at 8801 N. Chautauqua Blvd (see attached photo). Both buildings are constructed in the "Sprawling Plan" and incorporate the major components shown in the architectural drawings on page 177 of the context. However, both have different entry ways from those shown in the plans. Therefore, it raises the possibility that the mosaic tile design and single entry-way is original to the subject building. Also, in looking at the aerial view, the addition to the west side of the rear ell of Sears Hall is relatively small in scale and does not significantly impact the integrity of the design. From the photographs submitted in the follow up information, it appears that the primary elevations retain the original windows, and the replacement windows are in less visible locations. Additionally, the National context provides a better understanding of the history, purpose, and uses of this building type. Based on this information, we consider Sears Hall and the Reserve Center on Chautauqua to be eligible for listing in the National Register at least at a local level.

Therefore, unless there is additional information (such as building permits, construction documents, historic photographs, and/or specific physical evidence) to indicate the entryway has been substantially changed, and a case can be made that it is not eligible due to loss of integrity, we will consider the effect to be adverse.

While our recommendation is to retain the historic building, Section 106 regulations only require mitigation when there is an adverse effect. Therefore, we would need to negotiate a Memorandum of Agreement which outlines the mitigation for the loss of this building. For your consideration, we would consider preparing a nomination for the building on Chautauqua Boulevard and having it listed in the National Register of Historic Places as meaningful mitigation.



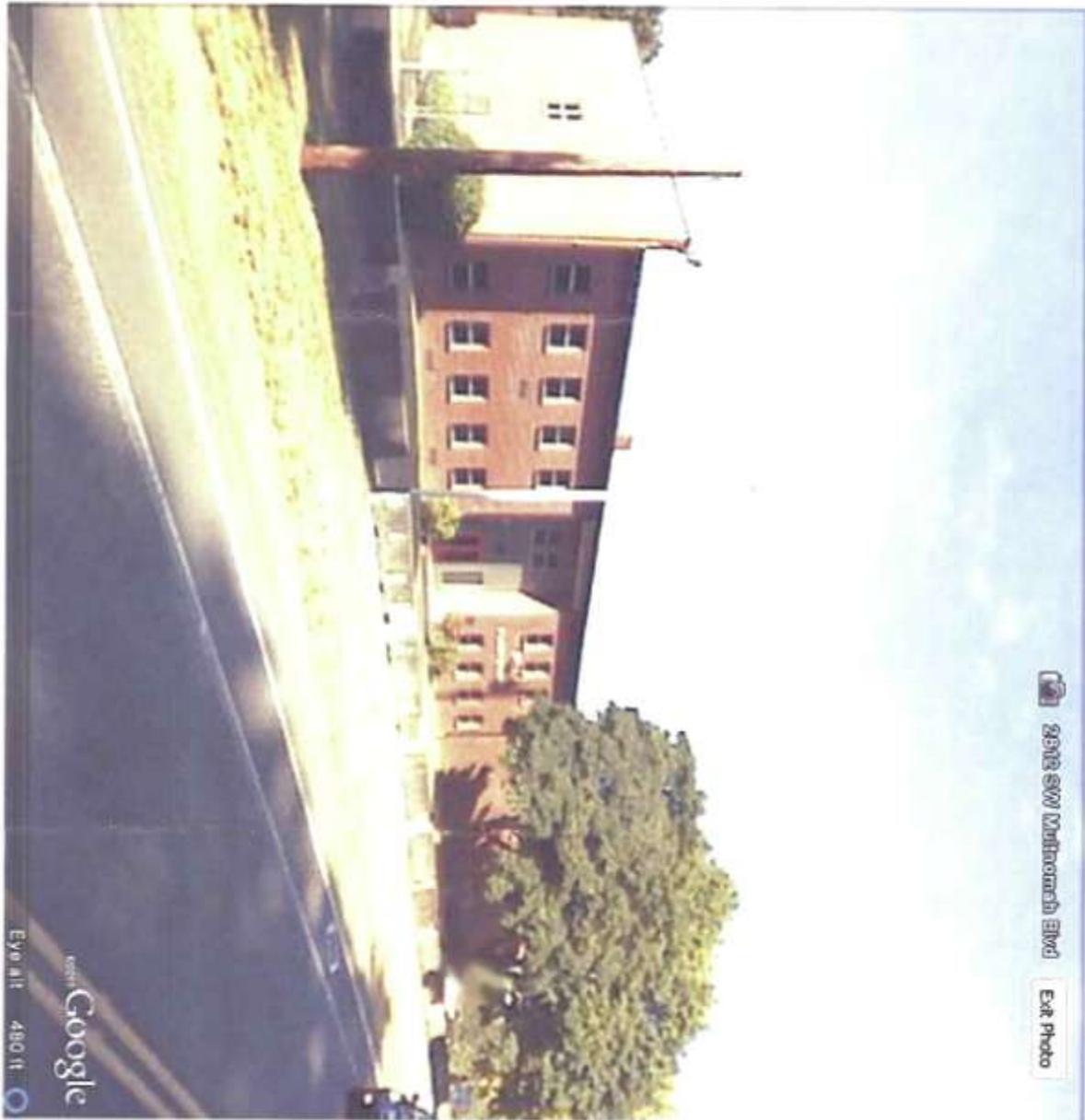
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Please feel free to contact me if you have further questions, comments or need additional assistance. In order to help us track your project accurately, please be sure to reference the SHPO case number above in all correspondence.

Sincerely,



Julie Osborne  
Preservation Specialist  
(503) 986-0661 or Julie.Osborne@state.or.us









---

**From:** Skeldon, Meline E Ms CTR 88TH RSC -NA- [meline.skeldon@usar.army.mil]  
**Sent:** Tuesday, September 14, 2010 3:35 PM  
**To:** Julie.Osborne@state.or.us  
**Cc:** Hall, Richard E; Nancy.A.Parrish@usace.army.mil; Mangum, Rachael  
**Subject:** SHPO Case No. 10-1814, Sears US Army Reserve Center Project - Response to Letter dated August 26, 2010 (UNCLASSIFIED)  
**Attachments:** 1983\_03\_005\_front\_entrance\_detail.pdf; 1952\_02\_002.pdf; 1952\_02\_003.pdf; 1952\_02\_014.pdf; 1983\_03\_003.pdf

Classification: UNCLASSIFIED  
Caveats: NONE

Dear Ms. Osborne,

Thank you for your time on the telephone call last week with Ms. Nancy Parrish, the US Army Corps of Engineers Cultural Resources technical reviewer for the BRAC Commission-recommended closure and disposal of the Jerome F. Sears US Army Reserve Center (USARC) in Portland, Oregon. In response to your letter dated August 26, 2010, and as discussed with Ms. Parrish, the 88th Regional Support Command of the US Army Reserves has uncovered additional information which confirms that the entryway of the Sears USARC (Sears Hall) has been substantially altered from the original metal and plate glass main entrance assembly. The original metal and glass entrance assembly is described as one of the "character-defining features" that a US Army Reserve Center of the Sprawling Plan-type must retain to be eligible for listing in the NRHP, on pages 173-174 of the Nationwide Historic Context, provided with our original Section 106 review materials.

Please find attached the as-built drawings for the Sears USARC (also called "Portland (South)" in these drawings) showing the original entrance configuration. The entryway was comprised of metal framing and plate glass panels surrounding two sets of double doors leading into a vestibule with a projecting level roof on a concrete porch. These plans are based on the 1952 Reisner and Urbahn standardized plans for a two-unit expansible facility without a basement, consistent with the information and drawings in the Nationwide Historic Context, and revised for the Sears facility in 1959.

Also attached are drawings for "Additions and Alterations to the 200 Member USAR Center w/ OMS" in Portland, Oregon, approved in 1983 and stamped as-built in 1985. The drawings show the addition of a kitchen to the rear wing and other changes that occurred at that time, including details of the South Elevation - New Entry Wall, showing construction of a new entry wall, installation of new doors and windows with ceramic tile surrounds at the front entrance on the South (main) elevation. These details match the current configuration of the front entrance to the Sears USARC.

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According to the Historic Context, a facility must retain all character-defining features defined on pages 173-174 to be eligible for inclusion on the NRHP. Because the front entrance of the Sears USARC has been modified, the facility is not considered eligible due to loss of integrity.

Please review these attached materials and let me know if you have any additional questions or if you require any additional information that would facilitate your review of the project.

Thank you for your assistance with this project.

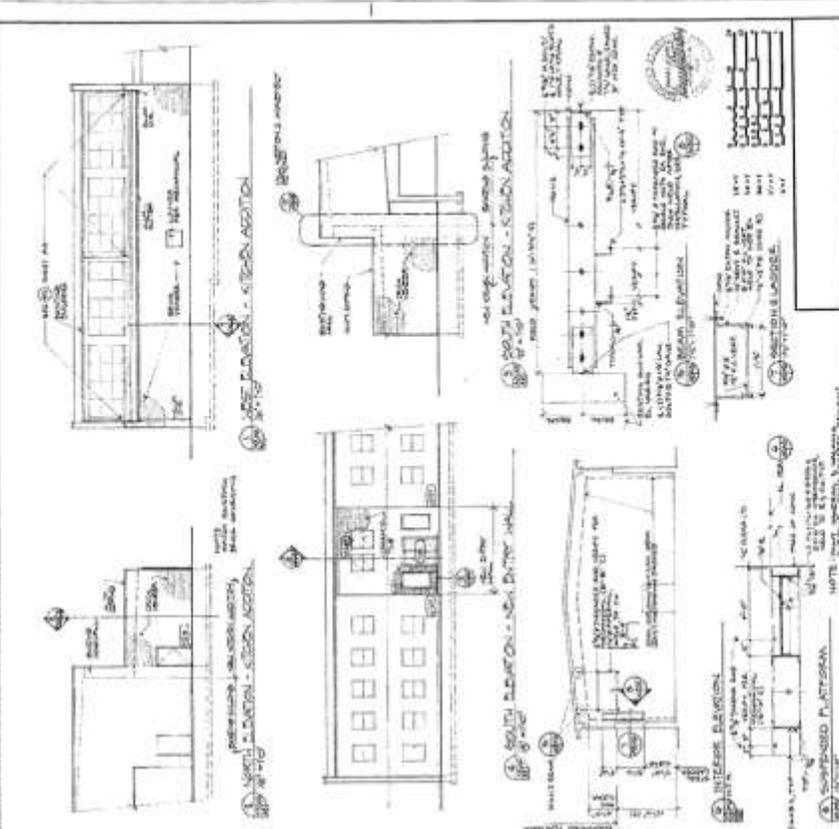
Sincerely,

Meline Skeldon  
BRAC Environmental Coordinator  
Environmental Protection Specialist  
88th Regional Support Command  
JM Waller Consultant  
COMM: 206.301.2177  
Classification: UNCLASSIFIED  
Caveats: NONE

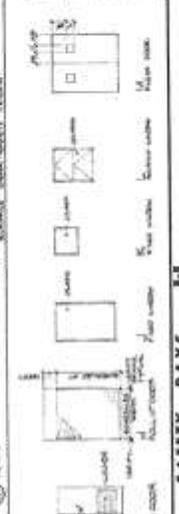
FUNCTIONAL ANALYSIS - VE PAYS

DOOR WINDOW SCHEDULE

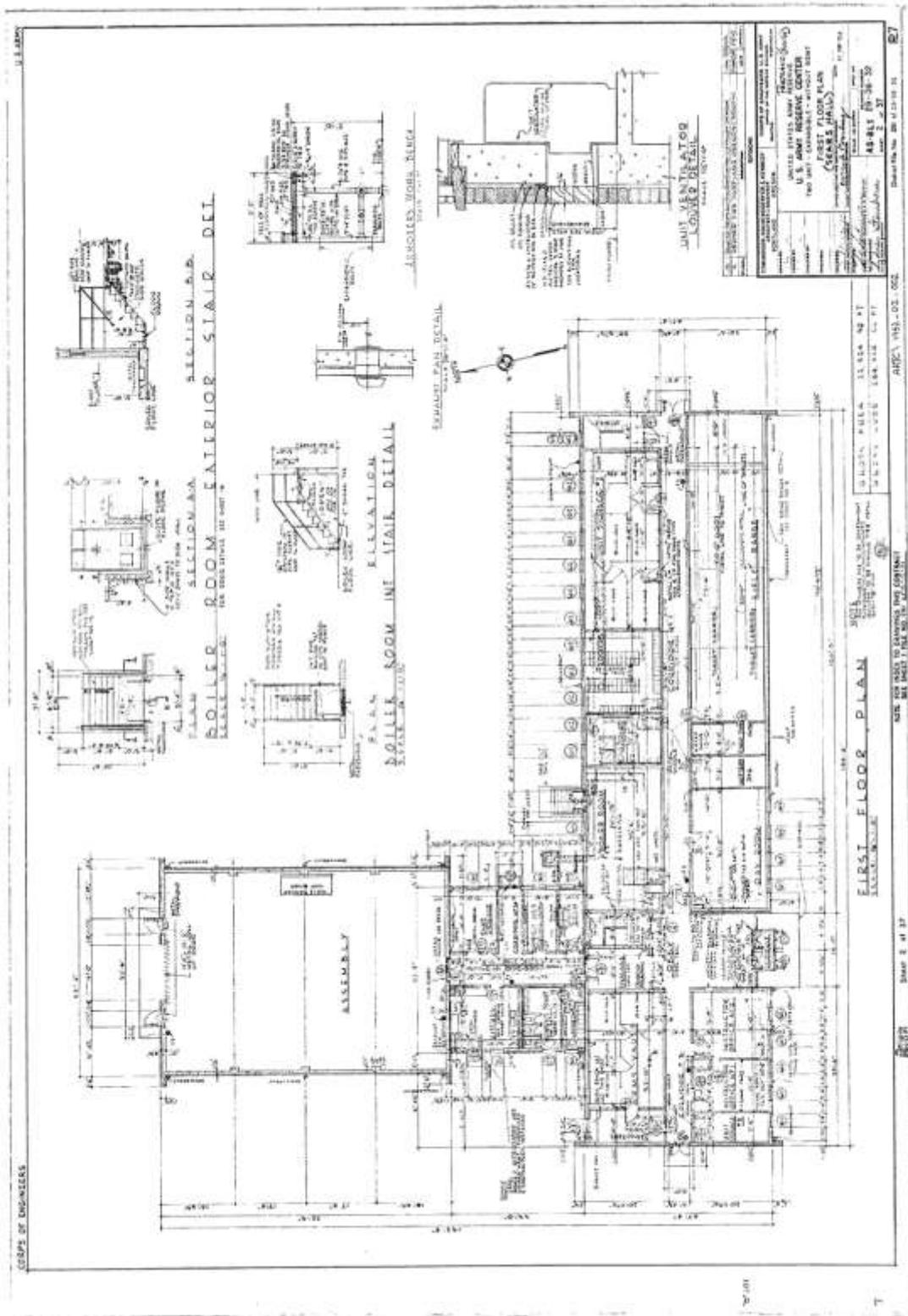
NO.	TYPE	DESCRIPTION	QTY	UNIT	REMARKS
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3	3	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION
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19	19	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION
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23	23	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION
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25	25	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION
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27	27	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION
28	28	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION
29	29	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION
30	30	1/2" x 6" x 6" GLASS	100	SQ. FT.	FOR INTERIOR PARTITION

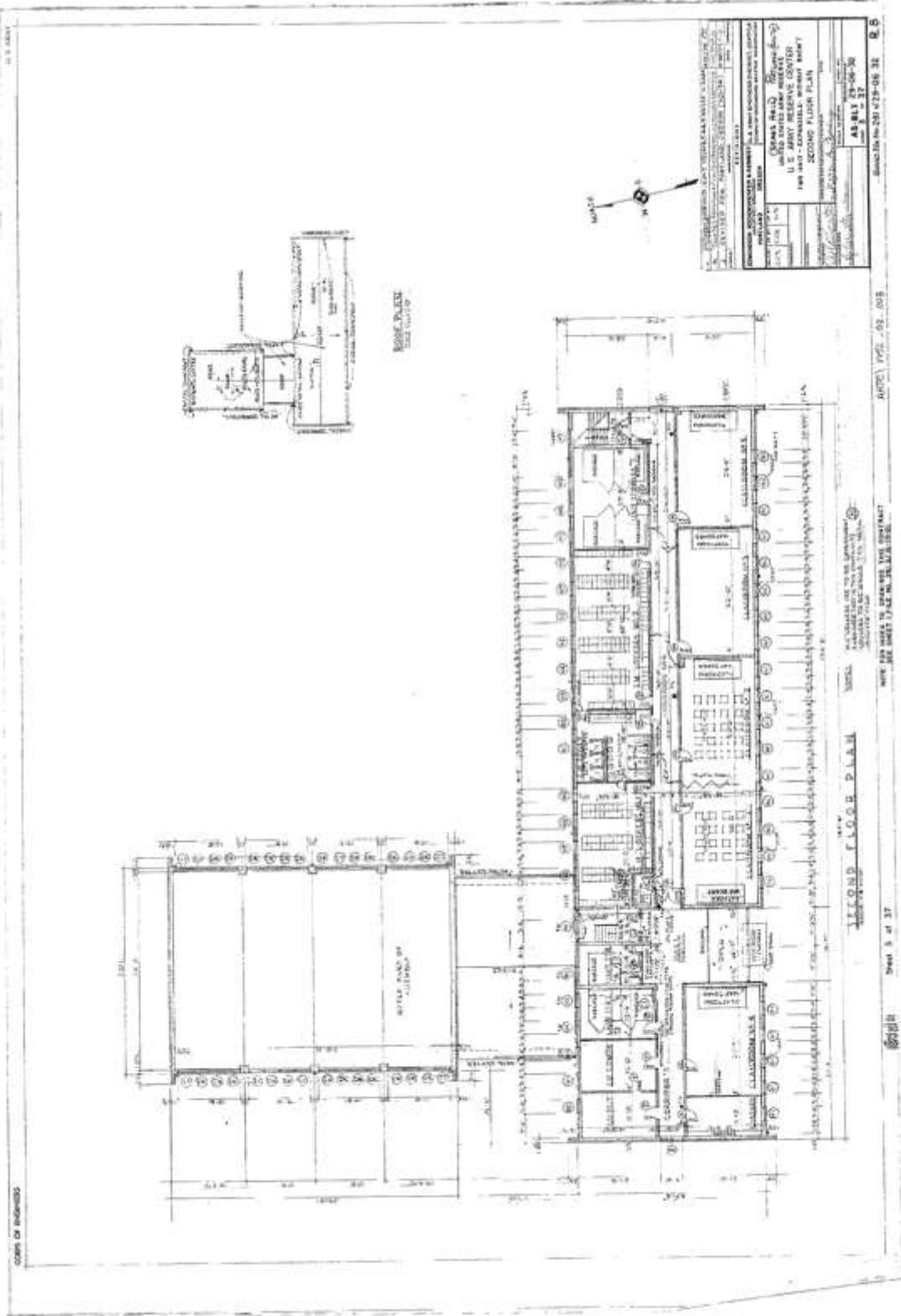


DATE	11/11/54
BY	W. J. H. H.
CHECKED BY	W. J. H. H.
SCALE	AS SHOWN
PROJECT	ADDITIONS AND ALTERATIONS TO 200 MEMBER USAR CENTER W/OM5
NO.	100
REVISED	NO
DESCRIPTION	DOOR SCHEDULE / ELEVATIONS
DATE	11/11/54
BY	W. J. H. H.
CHECKED BY	W. J. H. H.
SCALE	AS SHOWN
PROJECT	ADDITIONS AND ALTERATIONS TO 200 MEMBER USAR CENTER W/OM5
NO.	100
REVISED	NO
DESCRIPTION	DOOR SCHEDULE / ELEVATIONS



SAFETY PAYS











Oregon

Theodore R. Kulongoski, Governor

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

www.oregonheritage.org



September 22, 2010

Ms. Meline Skeldon  
USAR 88th Regional Support Command  
60 South O St  
Fort McCoy, WI 54656

RE: SHPO Case No. 10-1814  
Sears US Army Reserve Center Project  
1S 1E 20 (2371 SW Multnomah Blvd), Portland, Multnomah County

Dear Ms. Skeldon:

Thank you for the additional information consisting of drawings of Sears Hall that show the changes to the front entry, and interior alterations. These changes have impacted the building, however, the overall integrity remains, based on:

Location: It is its original location

Design: The form, overall plan (even with the small addition on the rear), and style remain

Materials: The original brick walls and metal windows, in their original configuration, remain

Workmanship: This building is reflective of the workmanship representative of the period of mid-century army reserve center construction

Feeling: The building continues to evoke the aesthetic of its time

Association: Integrity of setting, location, design, workmanship, materials, and feeling combine to convey integrity of association.

While we appreciate that this would not meet the national context for eligibility, there are statements within the context document that indicate the evaluation of NRHP eligibility at the local level of significance should occur on an individual, resource-by-resource basis, and a localized historic context should be developed in order to evaluate local significance.

Our Section 106 team has looked closely at Sears Hall, and although the architectural significance has been compromised by the changes to the entry, there remains sufficient integrity overall that it is locally significant and may be eligible for the National Register under Criterion A. Additionally, the USARC on N. Chautauqua Blvd. appears to be eligible, but again the context for local significance has not been established.

Please let us know how you wish to proceed with our finding of an adverse effect.

Sincerely,

Julie Osborne  
Preservation Specialist  
(503) 986-0661 or Julie.Osborne@state.or.us





REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

10 December 2010

Directorate of Public Works

Reid Nelson  
Advisory Council on Historic Preservation  
Director of the Office of Federal Agency Programs  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC 20004

Dear Mr. Nelson:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (Sears USARC) in Portland, Multnomah County, Oregon. On September 8, 2005, the Base Closure and Realignment (BRAC) Commission recommended that certain realignment actions occur at USAR components in Oregon. The proposed undertaking includes the transfer and sale of the Sears USARC from Government ownership to the Local Redevelopment Authority (LRA) for demolition of existing buildings, local reuse, and development as a mixed-use affordable housing development after closure. Army Reserve units will be relocated to a new Armed Forces Reserve Center on Camp Withycombe, Oregon.

The Sergeant Jerome F. Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

On July 26, 2010, the 88<sup>th</sup> RSC initiated consultation with the Oregon State Historic Preservation Office (SHPO), for the proposed closure, disposal, and reuse of the Sears USARC. The letter established the proposed Area of Potential Effects (APE) for the undertaking; identified three alternatives that were being evaluated as part of an Environmental Assessment (EA) to consider the impacts of the project; and identified Native American Tribes with whom consultation would be conducted to identify traditional cultural properties. The Area of Potential Effects (APE) is defined as the current boundaries of the Sears USAR facility, including the four buildings and paved and landscaped areas on the property.

The 88<sup>th</sup> RSC conducted a site files search and literature review, photographic documentation, and Native American consultation to identify historic properties in the APE. No previous archaeological surveys have been conducted and no archaeological resources have been identified at the Sears USARC. However, the potential for archaeological sites considered eligible for listing in the National Register of Historic Places (NRHP) is low based on previous disturbance (cut and fill) during

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the initial construction of the USARC. The Oregon SHPO and the Army, by consensus determination, have agreed that the main administration building of the Sears USARC (Sears Hall) is eligible for the NRHP under Criterion A at the local level.

Given the identification of NRHP-eligible properties in the project APE, the 88<sup>th</sup> RSC applied the criteria of adverse effect pursuant to 36 CFR 800.5(a) and determined that the proposed, transfer, sale and most likely demolition will result in an Adverse Effect on historic properties. In consultation with Oregon SHPO, the USAR proposes a mitigation strategy outlined in a draft Memorandum of Agreement (MOA) submitted to the Oregon SHPO for review and comment.

Pursuant to 36 CFR 800.11(e), we enclose herein materials describing the undertaking and affected resources at the Sears USARC. We request your review and invite your participation in resolving adverse effects related to the proposed undertaking at the Sears USARC.

We look forward to your response. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division

Enclosures

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**U.S. Army Corps of Engineers Mobile District**  
**and**  
**US Army Reserve, 88<sup>th</sup> Regional Support Command**  
**Base Realignment and Closure (BRAC)**  
**Closure, Disposal, and Reuse of the**  
**Sergeant Jerome F. Sears United States Army Reserve Center,**  
**Portland, Oregon (FAC ID ORO10)**

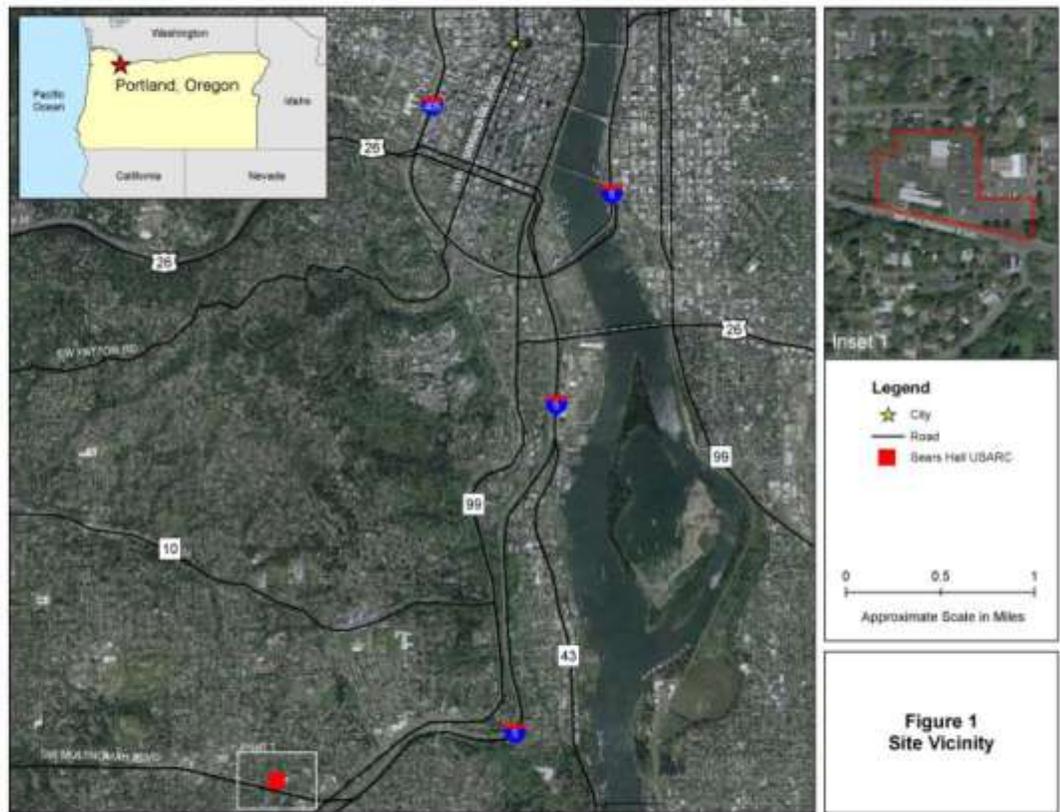
**The Undertaking**

On September 8, 2005, the Defense Base Realignment and Closure (BRAC) Commission recommended that the Department of Defense (DoD), close the Sergeant Jerome F. Sears U.S. Army Reserve Center (Sears USARC) in Portland, Oregon; and relocate units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon.

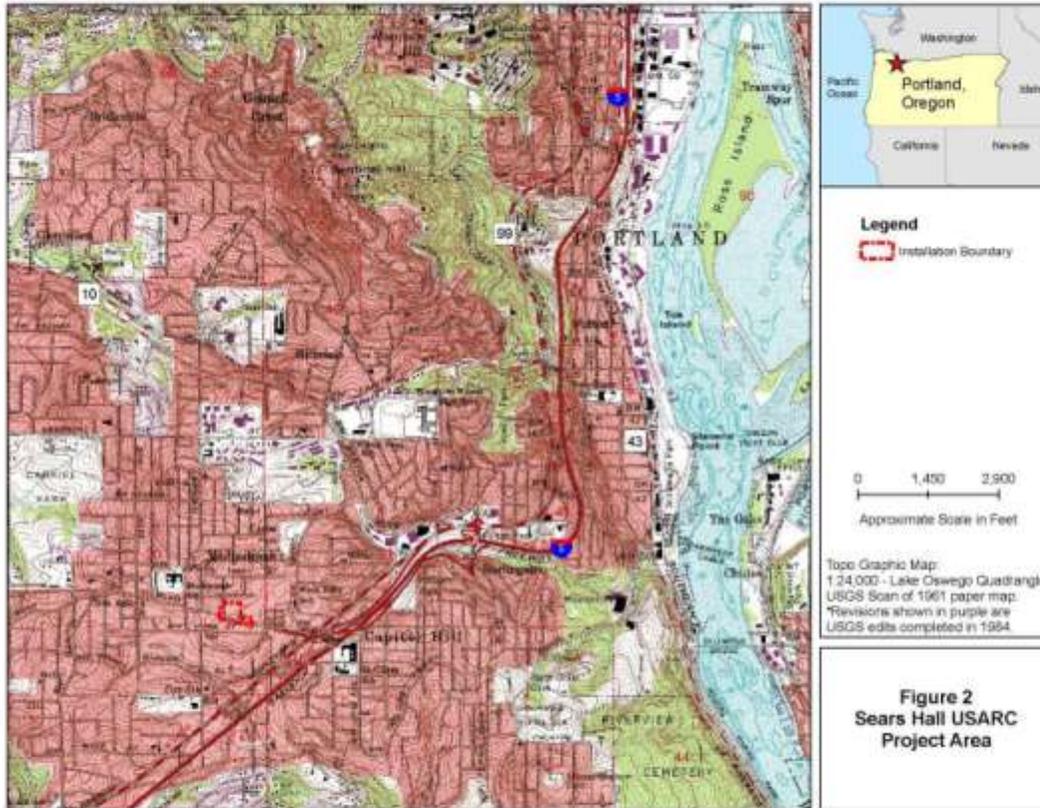
The U.S. Army Corps of Engineers (USACE), Mobile District, and the U.S. Army Reserves (USAR), 88<sup>th</sup> Regional Support Command conducted an Environmental Assessment (EA) to analyze potential impacts to environmental resources, cultural resources and socioeconomic conditions that could occur as a result of implementing the BRAC Commission recommendation. The proposed action is the closure, disposal, and reuse of the Sears USARC. Reuse of the surplus property made available by the closure of the Sears USARC would occur as a secondary action resulting from disposal. The Army's preferred alternative is the transfer the Sears USARC to the City of Portland for mixed use affordable housing through the negotiated sale of the property. It is anticipated that the residential reuse will follow the U.S. Department of Housing and Urban Development (HUD) "Housing First Model," which requires that one-fourth of the units be dedicated to the homeless with direct services. The conceptual reuse plan for the site includes demolition of the existing Sears USARC buildings and construction of mixed multifamily units, single family townhomes, a support center, and open space.

The Sears USARC, located at 2731 SW Multnomah Boulevard in Portland, Oregon was constructed in 1960 (Figures 1 and 2). The Sears USARC consists of approximately 4 acres of developed land with four permanent structures, a 24,104-square-foot administrative building (Sears Hall), a 4,669-square-foot Organizational Maintenance Shop (OMS), a 5,084-squarefoot storage building, and a three-sided cinderblock hazardous materials structure (Figure 3).

Closure, Disposal and Reuse of the Sgt. Jerome Sears USARC Reserve Center Section 106 Summary  
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**Figure 1. Location of the Sears USARC, Portland Oregon**



**Figure 2. Location of the Sears USARC, Portland Oregon**



**Figure 3. Area of Potential Effects (APE), Sears USARC, Portland Oregon**

Closure, Disposal and Reuse of the Sgt. Jerome Sears USARC Reserve Center Section 106 Summary  
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### **Area of Potential Effects (APE)**

The Army retained cultural resources professionals meeting the Secretary of the Interior's Professional Qualifications (36 CFR 61) to develop the Area of Potential Effects (APE) for the undertaking and identify potentially affected historic properties. The APE, as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sears USARC, including the four buildings and paved and landscaped areas on the parcel (Figure 3).

### **Section 106 Consultation**

As part of the EA the Army initiated consultation with appropriate agencies to meet regulatory requirements including, but not limited to, Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800.

In addition to the Oregon State Historic Preservation Office (SHPO), the Army identified and provided Native American tribes with interest in the Portland, Oregon area the opportunity to participate as interested parties in cultural resources consultations regarding the closure, disposal, and reuse of the Sears USARC.

### **Methodology for the Identification of Historic Properties**

The scope of identification efforts for this study included a site files search and literature review, photographic documentation, and Native American consultation. Detailed cultural contexts for USAR facilities in Oregon, including the Sears USARC, were developed during preparation of the 2004 USAR Integrated Cultural Resource Management Plan, Historic Properties Component, 70th RSC, Oregon. A nationwide context for US Army Reserve Centers provided information on the historic and architectural development of USARCs during the time period when the Sears USARC was constructed.

### **Archaeology**

No previous archaeological surveys have been conducted and no archaeological resources have been identified at the Sears USARC. In a letter dated August 9, 2010, the Oregon SHPO indicated that the project area occurs within a general area perceived to have a high probability for archaeological sites and/or human remains. However, the potential for archaeological sites considered eligible for listing in the National Register of Historic Places (NRHP) is low for the Sears USARC parcel based on previous disturbance. Previous disturbance on the parcel includes the original construction of the Sears USARC, including the main administration building, the OMS, and parking and landscaped areas by 1960, as well as the more recent additions of storage sheds and renovations to the main building. Original grading of the parcel resulted in both cut and fill areas with an average elevation change of 2 feet or less. This previous disturbance has diminished the potential for intact archaeological resources to be located on the parcel. At present, only narrow strips of grassy or landscaped areas, comprising approximately 1.6 acres, occur on the Sears USARC.

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The Oregon SHPO recommended extreme caution during future ground disturbing activities and, in the event that cultural materials are discovered, requires that all work must cease until an archaeologist can assess the discovery.

### ***Architectural History***

The facility consists of an administration building (referred to as Sears Hall or the administration building) (Figures 4-11), an OMS building (Figure 12), a storage building (Figure 13), and a three-sided HAZMAT storage structure (Figure 14). The administration and OMS buildings were constructed in 1960 and are concrete block and brick construction on concrete slab. The storage building was constructed sometime after 1994 and the HAZMAT storage structure was constructed in 1975.

The plan or footprint of the 24,104-square-foot Sears Hall is an asymmetrical T. The main two-story block forms the top portion of the T and has a shallow pitched gable roof with parapet walls on the side (east and west) elevations; the main (south) elevation faces the street. The main block is connected, via a one-story hyphen, to a double-height rear wing with clerestory lights on the side elevations. The main block is used for administrative and classroom space while the rear wing is a drill or assembly hall.



**Figure 4: Main (south) and east elevations of the Sergeant Jerome F. Sears USARC, facing northwest.**



**Figure 5. Main (south) elevation of the Sears USARC, facing east, showing brick veneer exterior and metal awning-style windows.**



**Figure 6. Main (south) elevation of the Sears USARC, facing north, showing main entrance, modified from the standardized plans for this building type.**



**Figure 7. Main (south) elevation of the Sears USARC, facing west, showing building exterior west of main entrance.**



**Figure 8. West elevation of the Sears USARC showing (from right to left), rear wing for drill/assembly space, one-story hyphen and rear of main block, facing east.**



**Figure 9. West elevation showing the addition to the rear wing, clerestory lights on the original rear wing visible above.**



**Figure 10. East elevation of the rear wing, hyphen and rear (north) elevation of the main block of the Sears USARC, facing west.**

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**Figure 11: East and north elevations of the main block of the Sears USARC.**



**Figure 12. Main elevation of the Organizational Maintenance Shop (OMS) in the Sears USARC complex.**



**Figure 13. Modern storage shed on the west side of the Sears USARC complex**



**Figure 14. Modern three-sided storage shed for hazardous materials at the Sears USARC complex.**

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Alterations at Sears Hall include the construction of a new main entry wall on the main (south) elevation, completed in 1985, including installation of new doors and windows with ceramic tile surrounds. The modified entrance is pierced by one set of double doors, two plate glass windows on either side of the doors, and two one-over-one light awning windows above the doors (Figure 6). During this renovation, a kitchen was also added to the rear wing (drill hall) of the administration building; the kitchen addition spans the length of the wing, on the west elevation. The kitchen was further renovated in 2002 and 2004 for use as office and storage space. Additional renovations to Sears Hall included replacement of the heater, boiler, roof, and improvements to the electrical system. Windows may also have been replaced over time.

The OMS building is situated on the northern portion of the parcel and consists of a 4,669 square foot single-story brick structure. The front (main) elevation is pierced by three vehicle service bays with roll-up metal doors. The OMS appears as “maintenance shop” on a general layout that included the main administration building dating to the period of original construction.

The two buildings in the APE constructed in 1960 (Sears Hall and the OMS) were evaluated for NRHP eligibility using guidelines from the 2008 *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Historic Context) for the Department of Defense Legacy Resource Management Program. The Sears USARC is based on standardized plans for US Army Reserve Centers categorized in the Historic Context as the “Sprawling Plan” within the Early Cold War property type. Standardized plans for this property type were initially developed by the architectural firm of Reisner and Urbahn in 1952, updated in 1953, and last revised by the successor firm of Urbahn, Brayton, and Burrows in 1956, in collaboration with the USACE. Known examples of this plan type were constructed from 1953 through 1964, possibly continuing later, by the Army at reserve facilities across the country.

Because buildings categorized in the Sprawling Plan sub-type are part of a nationwide building program and are common throughout the United States, a strict set of guidelines to examine their physical integrity through the presence of unaltered character-defining features, as identified in the Historic Context study was established to identify the most intact and representative examples of this property type. Examples of these required character-defining features include the original building footprint, original number of stories, original fenestration pattern, and original exterior finish.

The main administration building of the Sears USARC exhibits an alteration to one of the character-defining features of this property type identified in the Historic Context, the main entrance assembly. The original main entrance assembly consisted of metal framing and plate glass panels surrounding two sets of double doors leading into a vestibule with a projecting level roof on a concrete porch. Plans for this entrance are based on the original standardized plans for a two-unit expansible facility without a basement and revised for specific construction of the Sears facility in 1959. Alterations to character-defining features at the Sears USARC have diminished its architectural integrity for NRHP eligibility at the national level; however, in letters dated August 26, 2010, and September 22, 2010, the Oregon SHPO concluded that the

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facility may retain sufficient integrity to be eligible under Criterion A at the local level, although a localized historic context has not been developed.

Because an OMS is a support structure for the main Army Reserve center and lacks sufficient historical associations and/or design qualities on its own to meet any of the NRHP Criteria for eligibility, an OMS is not likely to be eligible on its own for inclusion on the NRHP.

### **Historic Properties**

The Oregon SHPO and the Army by consensus determination have agreed that the main administration building of the Sears USAC (Sears Hall) is eligible for the NRHP under Criterion A at the local level.

### **Effect Determination**

The Army has determined that the disposal and reuse of the Sears USARC, Portland, Oregon, is an undertaking and will have an adverse effect upon historic properties that have been designated as eligible for listing in the NRHP, and has consulted with the Oregon SHPO pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470f, Section 110(f) of the same Act (16 U.S.C. Section 470h-2[f])).

*Effect on the Sears USARC Main Administration Building: Adverse Effect.* The disposal and reuse of the Sears USARC, Portland, Oregon most likely will result in demolition of the Sears USARC main administration building and will have an adverse effect upon historic properties that have been designated as eligible for listing on the NRHP.

*Proposed Mitigation:* The Army has proposed a mitigation strategy outlined in a draft Memorandum of Agreement (MOA) submitted to the Oregon SHPO for review and comment. The MOA stipulates an offsite mitigation strategy similar to the one originally proposed by the Oregon SHPO in a letter dated August 26, 2010. The Webb USARC in Eugene, Oregon is of significantly similar design, construction, and age as the Sears USARC, has also been determined eligible for the NRHP and will remain in Army ownership. The MOA stipulates that the Army will prepare a Historic Building Maintenance Plan for the future management of the Webb USARC. Continued care and maintenance of Webb USARC, as a NRHP-eligible example of the same property type as the Sears USARC, will serve to resolve the adverse effect of the loss through transfer and demolition of the Sears USARC.

### **Consulting Parties and Public Input**

The Army is preparing an EA, which includes an assessment of impacts on cultural resources, in compliance with the National Environmental Policy Act (NEPA). It is anticipated that the EA document will be distributed to regulatory agencies and made available to the public in January 2011, with announcement of the consultation and invitation to comment posted in local newspapers.

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As part of the Section 106 consultation process pursuant to 36 CFR 800.6(a)(4) and in order to resolve adverse effects, the Army is seeking the public views and comment on the proposed mitigation strategy which will be presented in the EA available for public review.

Native American consultation is ongoing. The project is located within the traditional territories of the Burns Paiute Tribe, Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, Confederated Tribes of Grand Ronde Community of Oregon, Confederated Tribes of Siletz Reservation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribe of the Warm Springs Reservation, Coquille Indian Tribe, Cow Creek Band of Umpqua Tribe of Indians, and Klamath Tribes. Only the Confederated Tribes of Siletz Indians (Reservation) have responded indicating that they have no concerns regarding cultural resources in the APE. The Army also coordinated with the Oregon Commission on Indian Services in the Section 106 process based on their interest in these resources and relationship with Native American tribes in the state.



Preserving America's Heritage

December 20, 2010

Mr. David L. Moore  
Chief, Public Works-Environmental Division  
Department of the Army  
HQ, 88<sup>th</sup> Regional Support Command  
60 South O Street  
Fort McCoy, WI 54656

***Ref: Proposed Closure, Disposal, and Reuse of the Sergeant Jerome F. Sears US Army Reserve Center  
Portland, Multnomah County, Oregon***

Dear Mr. Moore:

On December 15, 2010, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the adverse effects of the referenced project on properties listed on and eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Oregon SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the opportunity to review this undertaking. If you have any questions, please contact Katharine Kerr at (202) 606-8534, or via e-mail at [kkerr@achp.gov](mailto:kkerr@achp.gov).

Sincerely,

Raymond V. Wallace  
Historic Preservation Technician  
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION  
1100 Pennsylvania Avenue NW, Suite 803 | Washington, DC 20004  
Phone: 202-606-8503 | Fax: 202-606-8647 | [achp@achp.gov](mailto:achp@achp.gov) | [www.achp.gov](http://www.achp.gov)



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

13 December 2010

Directorate of Public Works

Mr. Tim Wood, State Historic Preservation Officer  
Attn: Julie Osborne, Preservation Specialist  
Oregon Parks and Recreation Department  
725 Summer Street, NE Suite C  
Salem, OR 97301

Dear Mr. Wood:

The U.S. Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) has received your letter dated September 22, 2010 (SHPO Case 10-1814) and appreciates your comments on the proposed closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (USARC). As a result of Base Realignment and Closure (BRAC) Commission recommendations, the Army proposes the transfer and sale of this property from Government ownership to the Local Redevelopment Authority (LRA) for demolition of existing buildings, local reuse, and development as a mixed-use affordable housing development after closure.

The Sergeant Jerome F. Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36CFR800.16(d), consists of the current boundaries of the Sergeant Jerome F. Sears USARC, including the four buildings, paved and landscaped areas on the 4-acre parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the USAR, 88<sup>th</sup> RSC conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). The administration and OMS buildings within the USARC property are 50 years old and were evaluated for NRHP eligibility. After applying the NRHP criteria for evaluating properties, the USAR determined that there are no NRHP-eligible resources within the APE. However, in letters dated August 26, 2010 and September 22, 2010, your agency did not concur with the findings concluding that, although modifications to the Sears USARC administration building may have diminished its architectural integrity for NRHP eligibility at the national level, the facility may retain sufficient integrity to be eligible under Criterion A at the local level, although a localized historic context has not been developed.

For the purposes of completing the BRAC action within the legally mandated time frame, at this time the 88<sup>th</sup> RSC concedes NRHP eligibility for the main administration building at the Sears

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USARC under Criterion A at the local level by consensus determination. In no way does this concession reflect any opinions or determinations on behalf of the USAR regarding the eligibility of other, similar USARCs in Oregon or other parts of the country. As such, the proposed undertaking will now result in an Adverse Effect to historic properties. To comply with requirements for resolving adverse effects, the 88<sup>th</sup> RSC is preparing a package to submit to the Advisory Council on Historic Preservation (Council) to notify them of the finding and inquire about their interest in participating in the resolution of Adverse Effects. The USAR 88<sup>th</sup> RSC proposes to enter into a Memorandum of Agreement (MOA) with the Oregon SHPO regarding the proposed mitigation to resolve these adverse effects.

The 88<sup>th</sup> RSC proposes to mitigate adverse effects from the transfer and sale of the Sears USARC by developing a Historic Building Maintenance Plan (HBMP) for another USARC in the State of Oregon of significantly similar design, construction, and age as the Sears USARC. The Webb USARC in Eugene, Oregon was constructed in 1958 based on standardized plans developed by the same architectural firm of Reisner and Urbahn used for the construction of the Sears USARC. Webb USARC has previously been recommended eligible for the NRHP as part of a Section 110 survey of selected USARCs. A copy of the report documenting the Webb USARC is enclosed for your review. At this time, we request your review of the enclosed report and concurrence with the determination that the Webb USARC in Eugene, Oregon is eligible for the NRHP.

The development of an HBMP for the Webb USARC is the proposed mitigation measure because NRHP evaluation of the facility has already been prepared and because the facility will remain in the ownership of the USAR. Off-site mitigation suggested by your agency for documentation/nomination of the Sharft USARC located in Portland is not feasible because the Sharft USARC is slated for transfer out of USAR ownership to the Oregon Army National Guard. The USAR will no longer be responsible for management of the facility and cannot ensure the maintenance of the facility as an historic property.

The HBMP will identify character-defining features of the Webb USARC making it eligible for the NRHP, address preservation issues and provide specific guidance for implementing appropriate maintenance and rehabilitation standards to ensure best management practices are observed during future maintenance activities and to ensure the retention of the resource's architectural integrity and function within the requirements for the mission of the USAR. Please review the attached MOA and stipulations regarding the proposed mitigation. Once this MOA has been signed by all parties, closure and eventually demolition related activities will commence at Sears USARC.

At this time the 88<sup>th</sup> RSC requests that you review the enclosed information pursuant to Section 106 of the NHPA. We are requesting concurrence with our Determination of Adverse Effect for the proposed undertaking at Sears USARC, the Determination of Eligibility for Webb USARC, and would appreciate your written comments on the enclosed MOA within 30 calendar days of receipt of this letter. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division

Enclosures



Oregon

John A. Kitzhaber, MD, Governor

January 13, 2011

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

[www.oregonheritage.org](http://www.oregonheritage.org)



Ms. Meline Skeldon  
USAR 88th Regional Support Command  
60 South O St  
Fort McCoy, WI 54656

RE: SHPO Case No. 10-1814  
Sears US Army Reserve Cntr Project  
FOE/closure, disposal and reuse  
Dept of the Army  
1S 1E 20 (2371 SW Multnomah Blvd), Portland, Multnomah County

Dear Ms. Skeldon:

Thank you for submitting a Memorandum of Agreement on the project referenced above. We concur with the proposed mitigation measure, with one minor change. We would like to add the following language to Stipulation II.: "The Army shall forward a draft of the HBMP to SHPO for review and comment prior to its completion."

We have examples of management plans that we can provide to you as an example should you so desire. Please feel free to contact me if you have questions or concerns.

Sincerely,

Julie Osborne  
Preservation Specialist  
(503) 986-0661  
[Julie.Osborne@state.or.us](mailto:Julie.Osborne@state.or.us)

---

>>> "Skeldon, Meline E Ms CTR 88TH RSC -NA-"

>>> <[meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil)>

1/25/2011 3:08 PM >>>

Classification: UNCLASSIFIED

Caveats: NONE

Dear Ms. Osborne,

Thank you for your concurrence letter dated 13 January 2011 to the MOA/proposed mitigation for SHPO case 10-1814 (Sears USARC). As requested, we have added the following language to Stipulation II, B. "The Army Shall forward a draft of the HBMP to the SHPO for review and comment prior to its completion.". Attached is the revised and signed MOA, to expedite the action I am requesting signature on the attached (unless you require the mailed signed hardcopy). If you could please scan and email the final signed MOA, I would appreciate it.

Thank you for working with the Army Reserve on this matter, please contact me with any questions/concerns regarding this action.

V/r,

Meline

Meline Skeldon  
BRAC Environmental Coordinator  
Environmental Protection Specialist  
88th Regional Support Command  
JM Waller  
COMM: 206.301.2177

---

**Memorandum of Agreement  
Between  
The 88<sup>th</sup> Regional Support Command And  
The Oregon State Historic Preservation Officer  
For the  
Disposition of the Sergeant Jerome F. Sears United States Army Reserve Center,  
Portland, Oregon**

January 24, 2011

*WHEREAS*, the United States Army Reserve, 88<sup>th</sup> Regional Support Command (Army) plans to close the Sergeant Jerome F. Sears United States Army Reserve Center (Sears USARC), resulting in the disposal of 4 buildings/structures and approximately 4 acres of excess and surplus property, in Portland, Oregon (Project) (Map 1). The four buildings include the Sears Hall administration building, a Organizational Maintenance Shop, a storage shed and a three sided cinderblock hazardous materials structure; and

*WHEREAS*, the Army plans to carry out the Project pursuant to the Defense Base and Closure and Realignment Act of 1988 (Pub. L. 101-526, 10 U.S.C. § 2687 note), and the Defense Base Closure and Realignment Act of 1990 (Pub. L. 101-510, 10 U.S.C. § 2687 note) in a manner consistent with the requirements of the 2005 Defense Base Closure and Realignment Commission recommendation, thereby making the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. § 470f, and its implementing regulations, 36 CFR Part 800; and

*WHEREAS*, the Area of Potential Effect is the entire Sears USARC (see Map 2); and

*WHEREAS*, the Army has determined that leasing, licensing and/or disposal of the Sears USARC, Portland, Oregon, is an undertaking and will have an adverse effect upon historic properties that have been designated as eligible for listing on the National Register of Historic Places (National Register), and has consulted with the Oregon State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. Section 470f, Section 110(f) of the same Act (16 U.S.C. Section 470h-2[f]); and

*WHEREAS*, in accordance with 36 CFR § 800.6(a)(1), the Army notified the Council of its adverse effect determination by providing the specified documentation, and the Council has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

*WHEREAS* by consensus determination, the main administration building of the Sears USARC (Sears Hall) is eligible for the National Register due to its design and construction values and will be demolished; and

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**WHEREAS** the Webb USARC in Eugene, Oregon is of significantly similar design construction and age as Sears USARC and has also been determined eligible for the National Register, will remain in Army ownership, and is considered a suitable off site mitigation measure;

**Now, Therefore,** the Army and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties at Sears USARC and mitigate the loss of the structure, therefore satisfying the Army's Section 106, 110, and 111 responsibilities under the NHPA at Sears USARC.

### **Stipulations**

The Army will ensure that the following measures are carried out:

#### **I. Compliance with Federal Laws and Regulations**

In carrying out the disposal of excess and surplus property the Army will comply with all applicable laws and regulations.

#### **II. Documentation.**

- A. The Army shall create a Historic Building Maintenance Plan (HBMP) for Webb USARC. The Plan shall identify character-defining features of the building making it eligible for the National Register, address preservation issues and provide specific guidance for implementing appropriate maintenance and rehabilitation standards to ensure best management practices are observed during future maintenance activities and to ensure the retention of the resource's architectural integrity and function within the requirements for the mission of the USAR.
- B. The Army shall forward a draft of the HBMP to the SHPO for review and comment prior to its completion.
- C. The final Plan shall be provided to Army personnel responsible for Webb USARC for immediate use and to the SHPO for permanent archiving and public accessibility within 18 months of the execution of this agreement.

#### **III. Demolition of the Sears USARC.**

Demolition related activities may commence at Sears USARC once this MOA has been signed by all parties.

#### **IV. Anti-Deficiency Act**

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Any obligation of the Army under this Agreement is subject to the availability of appropriated funds, and nothing in this Agreement shall be interpreted to require obligations or payments by the Army in violation of the Anti-Deficiency Act, 31 U.S.C. 1341. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the provisions of this agreement, the Army will consult in accordance with the amendment and termination procedures found in this agreement.

#### **V. Status Reports**

Until such time as properties have been demolished or transferred out of federal ownership in accordance with the terms of this agreement, the Army will provide an annual status report to the Oregon SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation V. of this agreement, to make such revisions. The first status report will be submitted to the Oregon SHPO one year after the effective date of this agreement.

#### **VI. Dispute Resolution**

A. Should the Oregon SHPO object within thirty (30) days to any plans or other documents provided by the Army for review pursuant to this agreement, or to any actions proposed or initiated by the Army pursuant to this agreement, the Army shall consult with the SHPO to resolve the objection. If the Army determines that the objection cannot be resolved, the Army shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

- (1) Provide the Army with recommendations, which the Army will take into account in reaching a final decision regarding the dispute; or
  - (2) Notify the Army that it will comment pursuant to 36 C.F.R. §800.6(b)(2), and proceed to comment.
- (3) Any Council comment will be taken into account by the Army in accordance with 36 C.F.R. §800.6 or 800.7 with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation VI. A. above will pertain only to the subject of the dispute; the Army's responsibility to carry out all other actions under this agreement that is not the subject of the dispute will remain unchanged.

#### **VII. Amendments**

A. The Army or the Oregon SHPO, or both may request that this MOA be revised, whereby the parties will consult to consider whether such revision is necessary.





REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Diane Teeman, Chair  
Burns Paiute Tribe  
100 Pasigo Street  
Burns, OR 97720

Dear Chair Teeman,

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon. The Environmental Assessment (EA) document for this action, as required by the National Environmental Policy Act of 1969 (NEPA), focuses on the closure, disposal and reuse of the Sears USARC.

The Sergeant Jerome F. Sears USARC is located at 2731 SW Multnomah Boulevard in Portland, Oregon (Section 20, Township 1 South, Range 1 East; 45° 27' 57.6" N; 122° 42' 18.4" W; Figures 1 and 2). The project area is 4 acres in size and contains four buildings: an administration building (Sears Hall), an organizational maintenance shop (OMS) building (labeled AMSA [Area Maintenance Support Activity] on Figure 5), a storage building, and a three-sided hazardous material storage structure (Figures 3 and 5). The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

Three alternatives are being considered for the EA and all would occur at the current location of the Sergeant Jerome F. Sears USARC. Alternative 1 is a No Action Alternative that will represent baseline conditions at the property; no change from the current activities would occur under this alternative. Alternative 2 is a Caretaker Status Alternative where the USAR 88th RSC would secure the property, ensure public safety, implement maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. Under this alternative, the Army, via a negotiated sale, would sell the property to be developed as a mixed-use affordable housing development (Figure 4). Current buildings at the facility would likely be demolished.

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At this time, in accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, the 88th RSC wishes to formally initiate consultation with you concerning this action. To ensure that any areas of sacred or spiritual importance to Native American groups are taken into consideration as part of this process, we would appreciate your help in identifying any areas of interest or any concerns you may have regarding Traditional Cultural Properties or other traditional resources or properties within the project area shown on the enclosed maps.

We look forward to working with you or your designated representative throughout this consultation process. If you have any concerns regarding issues related to the project, please contact Ms. Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures



REPLY TO  
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**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

Directorate of Public Works

Diane Teeman, Chair  
Burns Paiute Tribe  
100 Pasigo Street  
Burns, OR 97720

Dear Chair Teeman,

As you may know from my last letter dated 26 July 2010, the U.S. Army Reserve (USAR), 88th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (Sears USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. The Army proposes the transfer and sale of this property from Government ownership to the Local Redevelopment Authority (LRA) for demolition of existing buildings, local reuse, and development as a mixed-use affordable housing development after closure.

The Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sears USARC, including the four buildings, paved and landscaped areas on the 4-acre parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the 88th RSC conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). The administration and OMS buildings within the USARC property are 50 years old and were evaluated for NRHP eligibility. The main administration building at the Sears USARC has been determined eligible for the NRHP under Criterion A at the local level by consensus determination with the Oregon SHPO.

As such, the proposed undertaking will result in an Adverse Effect to historic properties. To comply with requirements for resolving adverse effects, the 88th RSC submitted a package to the Advisory Council on Historic Preservation (Council) to notify them of the finding and inquire about their interest in participating in the resolution of Adverse Effects; the Council

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declined to participate. The 88th RSC proposes to enter into a Memorandum of Agreement (MOA) with the Oregon SHPO regarding the proposed mitigation to resolve these adverse effects.

The 88th RSC proposes to mitigate adverse effects from the transfer and sale of the Sears USARC by developing a Historic Building Maintenance Plan (HBMP) for another USARC in the State of Oregon of significantly similar design, construction, and age as the Sears USARC. The Webb USARC in Eugene, Oregon was constructed in 1958 based on standardized plans developed by the same architectural firm of Reisner and Urbahn used for the construction of the Sears USARC. Webb USARC has previously been recommended eligible for the NRHP as part of a Section 110 survey of selected USARCs, then part of the 70th Regional Readiness Command.

The development of an HBMP for the Webb USARC is the proposed mitigation measure because the facility is eligible for the NRHP and will remain in the ownership of the USAR. The Oregon SHPO concurred with the determination of eligibility for Webb USARC and with the proposed mitigation measure in a letter dated January 13, 2011.

An Environmental Assessment has been prepared for this action and will undergo a 30-day review period. Because adverse effects to cultural resources will be resolved through mitigation measures established in consultation with the Oregon SHPO, there are no significant adverse impacts (under NEPA) to cultural resources associated with the closure, disposal and reuse of USARC Sears. If appropriate, a Finding of No Significant Impacts (FONSI) will be approved after the conclusion of the review period.

At this time the 88th RSC requests any final comments or concerns you may have regarding this action and would appreciate your written comments within 30 calendar days of receipt of this letter. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88th RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division



REPLY TO  
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**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
80 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54556

26 July 2010

Directorate of Public Works

Cheryle Kennedy, Chairwoman  
Confederated Tribes of Grand Ronde Community of Oregon  
9615 Grand Ronde Road  
Grande Ronde, OR 97347

Dear Chairwoman Kennedy:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon. The Environmental Assessment (EA) document for this action, as required by the National Environmental Policy Act of 1969 (NEPA), focuses on the closure, disposal and reuse of the Sears USARC.

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Three alternatives are being considered for the EA and all would occur at the current location of the Sergeant Jerome F. Sears USARC. Alternative 1 is a No Action Alternative that will represent baseline conditions at the property; no change from the current activities would occur under this alternative. Alternative 2 is a Caretaker Status Alternative where the USAR 88th RSC would secure the property, ensure public safety, implement maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. Under this alternative, the Army, via a negotiated sale, would sell the property to be developed as a mixed-use affordable housing development (Figure 4). Current buildings at the facility would likely be demolished.

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At this time, in accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, the 88th RSC wishes to formally initiate consultation with you concerning this action. To ensure that any areas of sacred or spiritual importance to Native American groups are taken into consideration as part of this process, we would appreciate your help in identifying any areas of interest or any concerns you may have regarding Traditional Cultural Properties or other traditional resources or properties within the project area shown on the enclosed maps.

We look forward to working with you or your designated representative throughout this consultation process. If you have any concerns regarding issues related to the project, please contact Ms. Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures



REPLY TO  
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**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

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David L. Moore  
Chief, Public Works- Environmental Division



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HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Delores Pigsley, Chairwoman  
Confederated Tribes of the Siletz Reservation  
201 SE Swan Avenue  
Siletz, OR 97380

Dear Chairwoman Pigsley:

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Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures

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From: Larry Lunde [mailto:larry1@ctsi.nsn.us]  
Sent: Fri 8/6/2010 5:51 PM  
To: Skeldon, Meline E Ms CTR 88TH RSC -NA-  
Subject: Sears USARC Disposal

Meline - I am the Environmental Planner for the Siletz Tribe in Siletz Oregon. We received your letter dated July 26, 2010. We do not have any concerns regarding Section 106 of the NHPA. What I have been asked to inquire about is your planned disposal of the property and especially as mentioned in your letter your preferred alternative.

The Siletz Tribe has offices in the Portland area along with a number of tribal members which reside in the Portland area. The Tribe is always looking for opportunities to acquire property in areas such as this and especially the Portland area. Affordable quality housing for our members is an ongoing need.

I suspect the Army may already have a client in mind for implementing your preferred alternative. Even though, we would like to know more about your intent for disposal of the property and if this might be an opportunity for the Tribe to participate in. Thank you,  
LLL

Larry Lunde  
Environmental Planner  
Confederated Tribes of Siletz Indians  
P.O. Box 549  
Siletz, OR 97380

541-444-8287

1



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

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(MOA) with the Oregon SHPO regarding the proposed mitigation to resolve these adverse effects.

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Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division



REPLY TO  
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**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Warren Brainard, Tribal Council Chief  
Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians  
1245 Fulton Avenue  
Coos Bay, OR 97420

Dear Council Chief Brainard:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon. The Environmental Assessment (EA) document for this action, as required by the National Environmental Policy Act of 1969 (NEPA), focuses on the closure, disposal and reuse of the Sears USARC.

The Sergeant Jerome F. Sears USARC is located at 2731 SW Multnomah Boulevard in Portland, Oregon (Section 20, Township 1 South, Range 1 East; 45° 27' 57.6" N; 122° 42' 18.4" W; Figures 1 and 2). The project area is 4 acres in size and contains four buildings: an administration building (Sears Hall), an organizational maintenance shop (OMS) building (labeled AMSA [Area Maintenance Support Activity] on Figure 5), a storage building, and a three-sided hazardous material storage structure (Figures 3 and 5). The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

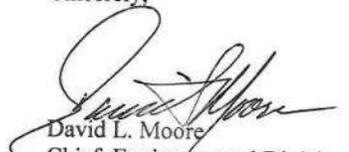
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At this time, in accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, the 88th RSC wishes to formally initiate consultation with you concerning this action. To ensure that any areas of sacred or spiritual importance to Native American groups are taken into consideration as part of this process, we would appreciate your help in identifying any areas of interest or any concerns you may have regarding Traditional Cultural Properties or other traditional resources or properties within the project area shown on the enclosed maps.

We look forward to working with you or your designated representative throughout this consultation process. If you have any concerns regarding issues related to the project, please contact Ms. Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

Directorate of Public Works

Warren Brainard, Tribal Council Chief  
Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians  
1245 Fulton Avenue  
Coos Bay, OR 97420

Dear Council Chief Brainard:

As you may know from my last letter dated 26 July 2010, the U.S. Army Reserve (USAR), 88th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (Sears USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. The Army proposes the transfer and sale of this property from Government ownership to the Local Redevelopment Authority (LRA) for demolition of existing buildings, local reuse, and development as a mixed-use affordable housing development after closure.

The Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sears USARC, including the four buildings, paved and landscaped areas on the 4-acre parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the 88th RSC conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). The administration and OMS buildings within the USARC property are 50 years old and were evaluated for NRHP eligibility. The main administration building at the Sears USARC has been determined eligible for the NRHP under Criterion A at the local level by consensus determination with the Oregon SHPO.

As such, the proposed undertaking will result in an Adverse Effect to historic properties. To comply with requirements for resolving adverse effects, the 88th RSC submitted a package to the Advisory Council on Historic Preservation (Council) to notify them of the finding and inquire about their interest in participating in the resolution of Adverse Effects; the Council

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declined to participate. The 88th RSC proposes to enter into a Memorandum of Agreement (MOA) with the Oregon SHPO regarding the proposed mitigation to resolve these adverse effects.

The 88th RSC proposes to mitigate adverse effects from the transfer and sale of the Sears USARC by developing a Historic Building Maintenance Plan (HBMP) for another USARC in the State of Oregon of significantly similar design, construction, and age as the Sears USARC. The Webb USARC in Eugene, Oregon was constructed in 1958 based on standardized plans developed by the same architectural firm of Reisner and Urbahn used for the construction of the Sears USARC. Webb USARC has previously been recommended eligible for the NRHP as part of a Section 110 survey of selected USARCs, then part of the 70th Regional Readiness Command.

The development of an HBMP for the Webb USARC is the proposed mitigation measure because the facility is eligible for the NRHP and will remain in the ownership of the USAR. The Oregon SHPO concurred with the determination of eligibility for Webb USARC and with the proposed mitigation measure in a letter dated January 13, 2011.

An Environmental Assessment has been prepared for this action and will undergo a 30-day review period. Because adverse effects to cultural resources will be resolved through mitigation measures established in consultation with the Oregon SHPO, there are no significant adverse impacts (under NEPA) to cultural resources associated with the closure, disposal and reuse of USARC Sears. If appropriate, a Finding of No Significant Impacts (FONSI) will be approved after the conclusion of the review period.

At this time the 88th RSC requests any final comments or concerns you may have regarding this action and would appreciate your written comments within 30 calendar days of receipt of this letter. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88th RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division



REPLY TO  
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**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Elwood Patawa, Chairman  
Confederated Tribes of the Umatilla Indian Reservation  
46411 Timine Way  
Pendleton, OR 97801

Dear Chairman Patawa:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon. The Environmental Assessment (EA) document for this action, as required by the National Environmental Policy Act of 1969 (NEPA), focuses on the closure, disposal and reuse of the Sears USARC.

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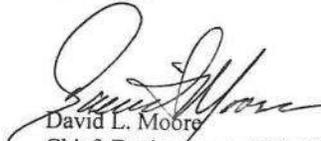
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Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures



REPLY TO  
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**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

Directorate of Public Works

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Confederated Tribes of the Umatilla Indian Reservation  
46411 Timine Way  
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The Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sears USARC, including the four buildings, paved and landscaped areas on the 4-acre parcel.

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As such, the proposed undertaking will result in an Adverse Effect to historic properties. To comply with requirements for resolving adverse effects, the 88th RSC submitted a package to the Advisory Council on Historic Preservation (Council) to notify them of the finding and inquire about their interest in participating in the resolution of Adverse Effects; the Council

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Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division



**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

REPLY TO  
ATTENTION OF

26 July 2010

Directorate of Public Works

Stanley Bucksmith, Chairman  
Confederated Tribes of the Warm Springs Reservation  
1233 Veterans Street  
Warm Springs, OR 97761

Dear Chairman Bucksmith:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon. The Environmental Assessment (EA) document for this action, as required by the National Environmental Policy Act of 1969 (NEPA), focuses on the closure, disposal and reuse of the Sears USARC.

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Enclosures



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31 January 2011

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Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division



REPLY TO  
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**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Ed Metcalf, Chairman  
Coquille Indian Tribe  
3050 Tremont Street  
North Bend, OR 97459

Dear Chairman Metcalf:

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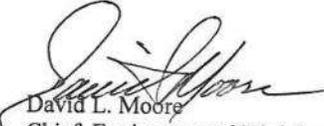
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Enclosures



REPLY TO  
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HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

Directorate of Public Works

Ed Metcalf, Chairman  
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60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Sue Shaffer, Chairperson  
Cow Creek Band of Umpqua Tribe of Indians  
2371 NE Stephens Street, Suite 100  
Roseburg, OR 97470

Dear Chairperson Shaffer:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon. The Environmental Assessment (EA) document for this action, as required by the National Environmental Policy Act of 1969 (NEPA), focuses on the closure, disposal and reuse of the Sears USARC.

The Sergeant Jerome F. Sears USARC is located at 2731 SW Multnomah Boulevard in Portland, Oregon (Section 20, Township 1 South, Range 1 East; 45° 27' 57.6" N; 122° 42' 18.4" W; Figures 1 and 2). The project area is 4 acres in size and contains four buildings: an administration building (Sears Hall), an organizational maintenance shop (OMS) building (labeled AMSA [Area Maintenance Support Activity] on Figure 5), a storage building, and a three-sided hazardous material storage structure (Figures 3 and 5). The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

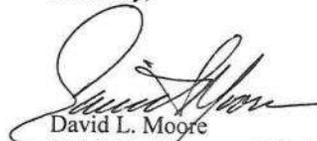
Three alternatives are being considered for the EA and all would occur at the current location of the Sergeant Jerome F. Sears USARC. Alternative 1 is a No Action Alternative that will represent baseline conditions at the property; no change from the current activities would occur under this alternative. Alternative 2 is a Caretaker Status Alternative where the USAR 88th RSC would secure the property, ensure public safety, implement maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. Under this alternative, the Army, via a negotiated sale, would sell the property to be developed as a mixed-use affordable housing development (Figure 4). Current buildings at the facility would likely be demolished.

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At this time, in accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, the 88th RSC wishes to formally initiate consultation with you concerning this action. To ensure that any areas of sacred or spiritual importance to Native American groups are taken into consideration as part of this process, we would appreciate your help in identifying any areas of interest or any concerns you may have regarding Traditional Cultural Properties or other traditional resources or properties within the project area shown on the enclosed maps.

We look forward to working with you or your designated representative throughout this consultation process. If you have any concerns regarding issues related to the project, please contact Ms. Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Environmental Division

Enclosures



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

Directorate of Public Works

Sue Shaffer, Chairperson  
Cow Creek Band of Umpqua Tribe of Indians  
2371 NE Stephens Street, Suite 100  
Roseburg, OR 97470

Dear Chairperson Shaffer:

As you may know from my last letter dated 26 July 2010, the U.S. Army Reserve (USAR), 88th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (Sears USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. The Army proposes the transfer and sale of this property from Government ownership to the Local Redevelopment Authority (LRA) for demolition of existing buildings, local reuse, and development as a mixed-use affordable housing development after closure.

The Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sears USARC, including the four buildings, paved and landscaped areas on the 4-acre parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the 88th RSC conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). The administration and OMS buildings within the USARC property are 50 years old and were evaluated for NRHP eligibility. The main administration building at the Sears USARC has been determined eligible for the NRHP under Criterion A at the local level by consensus determination with the Oregon SHPO.

As such, the proposed undertaking will result in an Adverse Effect to historic properties. To comply with requirements for resolving adverse effects, the 88th RSC submitted a package to the Advisory Council on Historic Preservation (Council) to notify them of the finding and inquire about their interest in participating in the resolution of Adverse Effects; the Council

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declined to participate. The 88th RSC proposes to enter into a Memorandum of Agreement (MOA) with the Oregon SHPO regarding the proposed mitigation to resolve these adverse effects.

The 88th RSC proposes to mitigate adverse effects from the transfer and sale of the Sears USARC by developing a Historic Building Maintenance Plan (HBMP) for another USARC in the State of Oregon of significantly similar design, construction, and age as the Sears USARC. The Webb USARC in Eugene, Oregon was constructed in 1958 based on standardized plans developed by the same architectural firm of Reisner and Urbahn used for the construction of the Sears USARC. Webb USARC has previously been recommended eligible for the NRHP as part of a Section 110 survey of selected USARCs, then part of the 70th Regional Readiness Command.

The development of an HBMP for the Webb USARC is the proposed mitigation measure because the facility is eligible for the NRHP and will remain in the ownership of the USAR. The Oregon SHPO concurred with the determination of eligibility for Webb USARC and with the proposed mitigation measure in a letter dated January 13, 2011.

An Environmental Assessment has been prepared for this action and will undergo a 30-day review period. Because adverse effects to cultural resources will be resolved through mitigation measures established in consultation with the Oregon SHPO, there are no significant adverse impacts (under NEPA) to cultural resources associated with the closure, disposal and reuse of USARC Sears. If appropriate, a Finding of No Significant Impacts (FONSI) will be approved after the conclusion of the review period.

At this time the 88th RSC requests any final comments or concerns you may have regarding this action and would appreciate your written comments within 30 calendar days of receipt of this letter. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88th RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works- Environmental Division



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

26 July 2010

Directorate of Public Works

Joseph S. Kirk, Chairman  
Klamath Tribes  
501 Chiloquin Boulevard  
Chiloquin, OR 97624

Dear Chairman Kirk:

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sergeant Jerome F. Sears USARC in Portland, Oregon and relocation of units to a new Armed Forces Reserve Center on Camp Withycombe, Oregon. The Environmental Assessment (EA) document for this action, as required by the National Environmental Policy Act of 1969 (NEPA), focuses on the closure, disposal and reuse of the Sears USARC.

The Sergeant Jerome F. Sears USARC is located at 2731 SW Multnomah Boulevard in Portland, Oregon (Section 20, Township 1 South, Range 1 East; 45° 27' 57.6" N; 122° 42' 18.4" W; Figures 1 and 2). The project area is 4 acres in size and contains four buildings: an administration building (Sears Hall), an organizational maintenance shop (OMS) building (labeled AMSA [Area Maintenance Support Activity] on Figure 5), a storage building, and a three-sided hazardous material storage structure (Figures 3 and 5). The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

Three alternatives are being considered for the EA and all would occur at the current location of the Sergeant Jerome F. Sears USARC. Alternative 1 is a No Action Alternative that will represent baseline conditions at the property; no change from the current activities would occur under this alternative. Alternative 2 is a Caretaker Status Alternative where the USAR 88th RSC would secure the property, ensure public safety, implement maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. Under this alternative, the Army, via a negotiated sale, would sell the property to be developed as a mixed-use affordable housing development (Figure 4). Current buildings at the facility would likely be demolished.

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At this time, in accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, the 88th RSC wishes to formally initiate consultation with you concerning this action. To ensure that any areas of sacred or spiritual importance to Native American groups are taken into consideration as part of this process, we would appreciate your help in identifying any areas of interest or any concerns you may have regarding Traditional Cultural Properties or other traditional resources or properties within the project area shown on the enclosed maps.

We look forward to working with you or your designated representative throughout this consultation process. If you have any concerns regarding issues related to the project, please contact Ms. Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,

  
David L. Moore  
Chief, Environmental Division

Enclosures



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

31 January 2011

Directorate of Public Works

Joseph S. Kirk, Chairman  
Klamath Tribes  
501 Chiloquin Boulevard  
Chiloquin, OR 97624

Dear Chairman Kirk:

As you may know from my last letter dated 26 July 2010, the U.S. Army Reserve (USAR), 88th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears US Army Reserve Center (Sears USARC) in Portland, Multnomah County, Oregon, in accordance with recommendations of the Base Closure and Realignment (BRAC) Commission. The Army proposes the transfer and sale of this property from Government ownership to the Local Redevelopment Authority (LRA) for demolition of existing buildings, local reuse, and development as a mixed-use affordable housing development after closure.

The Sears USARC complex, located at 2731 SW Multnomah Boulevard in Portland, Oregon covers approximately 4 acres and contains four buildings: the main administration building (Sears Hall), consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a storage building, and a three-sided hazardous material storage structure. The administration and OMS buildings were constructed in 1960; the other buildings were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), consists of the current boundaries of the Sears USARC, including the four buildings, paved and landscaped areas on the 4-acre parcel.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the 88th RSC conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). The administration and OMS buildings within the USARC property are 50 years old and were evaluated for NRHP eligibility. The main administration building at the Sears USARC has been determined eligible for the NRHP under Criterion A at the local level by consensus determination with the Oregon SHPO.

As such, the proposed undertaking will result in an Adverse Effect to historic properties. To comply with requirements for resolving adverse effects, the 88th RSC submitted a package to the Advisory Council on Historic Preservation (Council) to notify them of the finding and inquire about their interest in participating in the resolution of Adverse Effects; the Council

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declined to participate. The 88th RSC proposes to enter into a Memorandum of Agreement (MOA) with the Oregon SHPO regarding the proposed mitigation to resolve these adverse effects.

The 88th RSC proposes to mitigate adverse effects from the transfer and sale of the Sears USARC by developing a Historic Building Maintenance Plan (HBMP) for another USARC in the State of Oregon of significantly similar design, construction, and age as the Sears USARC. The Webb USARC in Eugene, Oregon was constructed in 1958 based on standardized plans developed by the same architectural firm of Reisner and Urbahn used for the construction of the Sears USARC. Webb USARC has previously been recommended eligible for the NRHP as part of a Section 110 survey of selected USARCs, then part of the 70th Regional Readiness Command.

The development of an HBMP for the Webb USARC is the proposed mitigation measure because the facility is eligible for the NRHP and will remain in the ownership of the USAR. The Oregon SHPO concurred with the determination of eligibility for Webb USARC and with the proposed mitigation measure in a letter dated January 13, 2011.

An Environmental Assessment has been prepared for this action and will undergo a 30-day review period. Because adverse effects to cultural resources will be resolved through mitigation measures established in consultation with the Oregon SHPO, there are no significant adverse impacts (under NEPA) to cultural resources associated with the closure, disposal and reuse of USARC Sears. If appropriate, a Finding of No Significant Impacts (FONSI) will be approved after the conclusion of the review period.

At this time the 88th RSC requests any final comments or concerns you may have regarding this action and would appreciate your written comments within 30 calendar days of receipt of this letter. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88th RSC, BRAC Environmental Coordinator, at (206) 301-2177 or at [meline.skeldon@usar.army.mil](mailto:meline.skeldon@usar.army.mil).

Sincerely,



DAVID L. MOORE  
Chief, Public Works- Environmental Division

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### **A.3 USFWS Consultation**

Appendix A.3 contains the following correspondence with USFS associated with the preparation of the Environmental Assessment.

Letter to USFWS

June 4, 2010

Letter from USFWS (Response)

June 14, 2010



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
60 SOUTH O STREET  
FORT MCCOY, WISCONSIN 54656

4 June 2010

Directorate of Public Works

Mr. Kemper McMaster  
State Supervisor  
U.S. Fish and Wildlife Service  
Oregon Fish & Wildlife Office  
2600 S.E. 98th Ave, Ste 100  
Portland, OR 97266

Dear Mr. McMaster,

The United States Army Reserve (USAR), 88<sup>th</sup> Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Sergeant Jerome F. Sears United States Army Reserve Center (Sears USARC) in Portland, Oregon, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Oregon. The recommendation includes the closure of the Sgt. Jerome F. Sears USARC in Portland, OR and relocation to a new Armed Forces Reserve Center on Camp Withycombe, OR. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act of 1969* (NEPA) focuses on the closure, disposal and reuse of the Sears USARC.

The impact of the new AFRC on Camp Withycombe was addressed in a separate NEPA document.

Sears USARC is 4 acres in size and contains four buildings. The remainder of the site is covered in pavement (parking) or landscaped areas. Three alternatives are being considered for the Proposed Action and all would occur at the current location of the Sears USARC, located at 2731 SW Multnomah Boulevard in Portland, Oregon:

Alternative 1 is a No Action Alternative that will represent baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Sears USARC be closed, this is not a feasible alternative.

Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military use has ended, to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve

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and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

Alternative 3, the preferred alternative of the Army, involves the closure of the Sears USARC and subsequent transfer of the property from the Army to another entity for reuse. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred. Under this alternative, the Army would sell the property to the City of Portland via a negotiated sale and the property would be developed as a mixed-use affordable housing development, including attached single-family for sale homes, multi-family rental units, and a community services building with public outdoor spaces. Existing buildings would be demolished and properly disposed of.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
- Available technical information regarding these issues
- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Meline Skeldon, U.S. Army Reserve 88<sup>th</sup> RSC, BRAC Environmental Coordinator, at 206.301.2177 or at [meline.skeldon@us.army.mil](mailto:meline.skeldon@us.army.mil).

Sincerely,



David L. Moore  
Chief, Public Works, Environmental Division

Enclosures



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Oregon Fish and Wildlife Office  
2600 SE 98<sup>th</sup> Avenue, Suite 100  
Portland, Oregon 97266  
Phone: (503) 231-6179 FAX: (503) 231-6195

May 29, 2010

Subject: Lists of threatened and endangered species that may occur in selected Oregon counties

### To Whom It May Concern:

This letter accompanies a species list(s) downloaded from our website (<http://www.fws.gov/oregonfwo/Species/Lists/RequestList.asp>), which shows threatened and endangered species that may occur within the area of your proposed project. The species list(s) fulfills the requirement of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems on which they depend may be conserved. Under section 7(a)(1) and 7(a)(2) of the Act and pursuant to 50 CFR 402 *et seq.*, Federal agencies are required to utilize their authorities to carry out programs which further species conservation and to determine whether projects may affect threatened and endangered species, and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (NEPA) (42 U.S.C. 4332 (2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to the Biological Assessment be prepared to determine whether they may affect listed and proposed species or critical habitats. Recommended contents of a Biological Assessment are described in Enclosure A, as well as 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that threatened and endangered species and/or designated critical habitat may be affected by the project, the agency is required to consult with the Service following the requirements of the regulations that implement the Act (50 CFR 402).

The county species list(s) includes a list of candidate species under review for listing and those species that the Service considers "species of concern." Candidate species have no protection under the Act but are included for consideration as it is possible candidates could be listed prior to the completion of your project. Species of concern are those taxa whose conservation status is of concern to the Service (many previously known as Category 2 candidates), but for which further information is still needed.



If a proposed project may affect only candidate species or species of concern, you are not required to perform a Biological Assessment or evaluation or consult with the Service. However, the Service recommends minimizing impacts to these species to the extent possible in order to prevent potential future conflicts. Therefore, if early evaluation of the project indicates that it is likely to adversely impact a candidate species or species of concern, your agency may wish to request technical assistance from this office.

If your project includes communications or cell towers, you should be aware that migratory birds, another of our Trust Resources, can suffer significant mortality from collisions with towers. Further information on this issue can be obtained from the following web sites: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm> and <http://www.towerkill.com>. Please refer to the recently approved Service Guidance on the Siting, Construction, Operation and Decommissioning of Communications Towers (<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>). We recommend its application to relevant projects. We also recommend the tower site evaluation form (found on the guidance webpage), which you may find useful in helping to determine the effects of your proposed project to endangered species and migratory birds.

The bald eagle (*Haliaeetus leucocephalus*) has recovered and was removed from the Federal List of Endangered and Threatened Wildlife and Plants in 2007. The bald eagle occurs in all Oregon counties, and the species continues to be protected under the Bald and Golden Eagle Protection Act. For more information on bald eagles, and for the Service's "National Bald Eagle Management Guidelines," please visit the Service's regional webpage devoted to the bald eagle (<http://www.fws.gov/pacific/eagle/>).

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to investigate opportunities for incorporating conservation of threatened and endangered species into project planning processes as a means of complying with the Act. Please include a copy of this letter and any species lists downloaded from our website with any request for consultation or correspondence about your project that you submit to our office. If you have questions regarding your responsibilities under the Act, please contact Cat Brown at (503) 231-6179. For questions regarding listed salmon and steelhead trout, please contact NOAA Fisheries Service, 525 NE Oregon Street, Suite 500, Portland, Oregon 97232, (503) 230-5400.

Enclosure A

**RESPONSIBILITIES OF FEDERAL AGENCIES UNDER SECTION 7(a) and (c)  
OF THE ENDANGERED SPECIES ACT**

**SECTION 7(a) Consultation/Conference**

Section 7(a) of the Act requires:

1. Federal agencies to utilize their authorities to carry out programs to conserve endangered and threatened species;
2. Consultation with the U.S. Fish and Wildlife Service (Service) when a Federal action may affect a listed endangered or threatened species or designated critical habitat to insure that any action authorized, funded or carried out by a Federal agency is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of designated critical habitat. The process is initiated by the Federal agency after it has determined if its action may affect a listed species; and
3. Conference with the Service when a Federal action is likely to jeopardize the continued existence of a proposed species or result in destruction or adverse modification of proposed critical habitat.

**SECTION 7(c) Preparation of a Biological Assessment**

Section 7(c) of the Act requires Federal agencies or their designees to prepare a Biological Assessment (BA) for construction projects.<sup>1</sup> For actions that are not construction projects, we recommend that a biological evaluation similar to a BA be prepared to evaluate the effects of the proposed project on listed and proposed species and critical habitats. The purpose of the BA or biological evaluation is to identify listed and proposed species which are likely to be affected by a proposed project. The process is initiated by a Federal agency by requesting a list of threatened and endangered species and critical habitats. The BA or biological evaluation should be completed within 180 days after its initiation (or within such a time period as is mutually agreeable). If the BA is not initiated within 90 days of receipt of the species list, the accuracy of the species list should be informally verified with the Service. No irreversible commitment of resources is to be made during the preparation of the BA which would foreclose reasonable and prudent alternatives to jeopardy to listed species. Planning, design, and administrative actions may be taken; however, no construction may begin.

A biological assessment or biological evaluation should include the following information:

**1. Description of proposed action (project).**

Describe the following and attach any relevant maps, diagrams, or designs:

- **Who** is proposing the action?
- **Where** is the action? Be as specific as possible. Include maps, county, township, range, stream, and any other pertinent information.
- **What** is the proposed action? Describe what is planned, the objectives of the action, include designs, diagrams, and best management practices applied, etc.
- **How** is the action going to be implemented? Give specific details, such as what type

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<sup>1</sup>A construction project (or other undertaking having similar physical impacts) is a major Federal action significantly affecting the quality of the human environment as referred to in NEPA (42 U.S.C. 4332. (2)c.

of equipment is used, how the action area will be accessed, etc.

- **When** will the action be implemented?

**2. Description of listed and proposed species and critical habitat, status, distribution and habitat use by the species in the project area.**

Identify which listed, proposed and candidate species and critical habitats may potentially be affected (beneficially or adversely) by the action. Describe how the species use the project area. Assistance with this information can be obtained from local offices of the Service.

**3. Description of the action area.**

Describe all areas affected by the proposed project. The action area refers to the area directly or indirectly affected by the proposed action; this area will usually be larger than the project footprint. Include on-site inspection or survey data, views of recognized experts (e.g., ODFW), and literature reviews.

**4. Effects of the proposed action on listed and proposed species and designated or proposed critical habitat.**

Describe in detail the effects of the action on the species and their habitats including direct and indirect effects, as well as effects that are interrelated and interdependent effects. Summarize your analysis of all project effects.

**5. Description of measures to minimize effects to listed species, and proposed project monitoring.**

Describe methods to be used to avoid, minimize and correct adverse short and long-term effects. Describe what will be monitored, who will monitor and the frequency of monitoring.

**6. Determination of effect.**

Clearly state your final effects determination for each listed and proposed species and designated and proposed critical habitat. Effects determinations may be:

- no effect
- may affect, not likely to adversely affect (appropriate for actions that have only beneficial, insignificant, or discountable effects)
- may affect, likely to adversely affect (appropriate for actions with effects to listed species or designated critical habitat that are not entirely insignificant, discountable or wholly beneficial)

**7. Attachments.**

Attachments should include all relevant information supporting the above categories such as maps, project design, drawings, specifications, pollution control plan, photos of project site and adjacent area, site survey data, and literature cited.

For more information on consultation under section 7 of the Endangered Species Act, visit the Service's national consultation website at <http://www.fws.gov/endangered/consultations/index.html>.

**FEDERALLY LISTED, PROPOSED, CANDIDATE SPECIES  
AND SPECIES OF CONCERN  
UNDER THE JURISDICTION OF THE FISH AND WILDLIFE SERVICE  
WHICH MAY OCCUR WITHIN MULTNOMAH COUNTY, OREGON**

**LISTED SPECIES**

**Mammals**

**Terrestrial:**

Columbian white-tailed deer (Columbia River distinct population segment)	<i>Odocoileus virginianus leucurus</i>	E
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**Birds**

Northern spotted owl	<i>Strix occidentalis caurina</i>	CH T
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**Fish**

**Inland:**

Bull trout	<i>Salvelinus confluentus</i>	CH T
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**Plants**

Willamette daisy	<i>Erigeron decumbens</i> var. <i>decumbens</i>	CH E
Water howellia	<i>Howellia aquatilis</i>	T
Bradshaw's desert parsley	<i>Lomatium bradshawii</i>	E
Kincaid's lupine	<i>Lupinus sulphureus</i> ssp. <i>kincaidii</i>	CH T
Nelson's checker-mallow	<i>Sidalcea nelsoniana</i>	T

**PROPOSED SPECIES**

**None**

No Proposed Endangered Species	PE
No Proposed Threatened Species	PT

**CANDIDATE SPECIES**

**Birds**

Streaked horned lark	<i>Eremophila alpestris strigata</i>
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**Plants**

Northern wormwood	<i>Artemisia campestris</i> var. <i>wormskioldii</i>
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**SPECIES OF CONCERN**

**Mammals**

Pallid bat	<i>Antrozous pallidus pacificus</i>
Red tree vole	<i>Arborimus longicaudus</i>
Townsend's western big-eared bat	<i>Corynorhinus townsendii townsendii</i>
Silver-haired bat	<i>Lasionycteris noctivagans</i>
Long-eared myotis bat	<i>Myotis evotis</i>
Long-legged myotis bat	<i>Myotis volans</i>
Yuma myotis bat	<i>Myotis yumanensis</i>

Last Updated May 29, 2010 (1:43:03 PM)  
U.S. Fish and Wildlife Service, Oregon Fish and Wildlife Office  
Page 1 of 4

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**FEDERALLY LISTED, PROPOSED, CANDIDATE SPECIES  
AND SPECIES OF CONCERN  
UNDER THE JURISDICTION OF THE FISH AND WILDLIFE SERVICE  
WHICH MAY OCCUR WITHIN MULTNOMAH COUNTY, OREGON**

Camas pocket gopher

*Thomomys bulbivorus*

**Birds**

Northern goshawk  
Tricolored blackbird  
Western burrowing owl  
Olive-sided flycatcher  
Harlequin duck  
Yellow-breasted chat  
Lewis' woodpecker  
Mountain quail  
Band-tailed pigeon  
Oregon vesper sparrow  
Purple martin

*Accipiter gentilis*  
*Agelaius tricolor*  
*Athene cucularia hypugaea*  
*Contopus cooperi*  
*Histrionicus histrionicus*  
*Icteria virens*  
*Melanerpes lewis*  
*Oreortyx pictus*  
*Patagioenas fasciata*  
*Pooecetes gramineus affinis*  
*Progne subis*

**Reptiles and Amphibians**

Northern Pacific pond turtle  
Coastal tailed frog  
Oregon slender salamander  
Larch Mountain salamander  
Northern red-legged frog  
Cascades frog

*Actinemys marmorata marmorata*  
*Ascaphus truei*  
*Batrachoseps wrighti*  
*Plethodon larselli*  
*Rana aurora aurora*  
*Rana cascadae*

**Fish**

Pacific lamprey  
Coastal cutthroat trout

*Lampetra tridentata*  
*Oncorhynchus clarki ssp*

**Invertebrates**

**Snails:**

Columbia pebblesnail

*Fluminicola fuscus (= columbianus)*

**Insects:**

Mt. Hood primitive brachycentrid caddisfly  
Mt. Hood farulan caddisfly  
Columbia Gorge neothremman caddisfly  
Wahkeena Falls flightless stonefly

*Eobrachycentrus gelidae*  
*Farula jewetti*  
*Neothremma andersoni*  
*Zapada wahkeena*

**Clams:**

California floater mussel

*Anodonta californiensis*

**Plants**

Howell's bentgrass  
Cliff paintbrush  
Cold-water corydalis  
Pale larkspur  
Howell's daisy  
Oregon fleabane  
Barrett's penstemon  
Whitetop aster  
Oregon sullivantia

*Agrostis howellii*  
*Castilleja rupicola*  
*Corydalis aquae-gelidae*  
*Delphinium leucophaeum*  
*Erigeron howellii*  
*Erigeron oregonus*  
*Penstemon barrettiae*  
*Sericocarpus rigidus*  
*Sullivantia oregana*

**DELISTED SPECIES**

Last Updated May 29, 2010 (1:43:03 PM)  
U.S. Fish and Wildlife Service, Oregon Fish and Wildlife Office  
Page 2 of 4

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**FEDERALLY LISTED, PROPOSED, CANDIDATE SPECIES  
AND SPECIES OF CONCERN  
UNDER THE JURISDICTION OF THE FISH AND WILDLIFE SERVICE  
WHICH MAY OCCUR WITHIN MULTNOMAH COUNTY, OREGON**

**Birds**

Aleutian Canada goose  
American Peregrine falcon  
Bald eagle

*Branta canadensis leucopareia*  
*Falco peregrinus anatum*  
*Haliaeetus leucocephalus*

**Definitions:**

Listed Species: An endangered species is one that is in danger of extinction throughout all or a significant portion of its range. A threatened species is one that is likely to become endangered in the foreseeable future.

Proposed Species: Taxa for which the Fish and Wildlife Service or National Marine Fisheries Service has published a proposal to list as endangered or threatened in the Federal Register.

Candidate Species: Taxa for which the Fish and Wildlife Service has sufficient biological information to support a proposal to list as endangered or threatened.

Species of Concern: Taxa whose conservation status is of concern to the U.S. Fish and Wildlife Service (many previously known as Category 2 candidates), but for which further information is still needed. Such species receive no legal protection and use of the term does not necessarily imply that a species will eventually be proposed for listing.

Delisted Species: A species that has been removed from the Federal list of endangered and threatened wildlife and plants.

**Key:**

E Endangered  
T Threatened  
CH Critical Habitat has been designated for this species  
PE Proposed Endangered  
PT Proposed Threatened  
PCH Critical Habitat has been proposed for this species

**Notes:**

Marine & Anadromous Species: Please consult the National Marine Fisheries Service (NMFS) (<http://www.nmfs.noaa.gov/pr/species/>) for marine and anadromous species. The National Marine Fisheries Service (NMFS) manages mostly marine and anadromous species, while the U.S. Fish and Wildlife Service manages the remainder of the listed species, mostly terrestrial and freshwater species.

Marine Turtle Conservation and Management: All six species of sea turtles occurring in the U.S. are protected under the Endangered Species Act of 1973. In 1977, NOAA Fisheries and the U.S. Fish and Wildlife Service signed a Memorandum of Understanding to jointly administer the Endangered Species Act with respect to marine turtles. NOAA Fisheries has the lead responsibility for the conservation and recovery of sea turtles in the marine environment and the U.S. Fish and Wildlife Service has the lead for the conservation and recovery of sea turtles on nesting beaches. For more information, see the NOAA Fisheries webpage on sea turtles <http://www.nmfs.noaa.gov/pr/species/turtles/>.

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Page 3 of 4

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**FEDERALLY LISTED, PROPOSED, CANDIDATE SPECIES  
AND SPECIES OF CONCERN  
UNDER THE JURISDICTION OF THE FISH AND WILDLIFE SERVICE  
WHICH MAY OCCUR WITHIN MULTNOMAH COUNTY, OREGON**

**Gray Wolf:** On February 27, 2008, the Service published a final rule that established a distinct population segment and delisted the gray wolf (*Canis lupus*) in the northern Rocky Mountains (which includes a portion of Eastern Oregon, east of the centerline of Highway 395 and Highway 78 north of Burns Junction and that portion of Oregon east of the centerline of Highway 95 south of Burns Junction). Any wolves found west of this line in Oregon are still listed as endangered [see 73 FR 10514]. Gray wolves in Oregon are still State-listed as endangered, regardless of location.

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U.S. Fish and Wildlife Service, Oregon Fish and Wildlife Office  
Page 4 of 4

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-----Original Message-----

From: Steve\_Wille@fws.gov [mailto:Steve\_Wille@fws.gov]  
Sent: Monday, June 14, 2010 6:56 PM  
To: Skeldon, Meline E Ms CTR 88TH RSC -NA-  
Subject: Sears USARC

ELECTRONIC RESPONSE

File Number: 7974.0041  
Tracking Number: 10-1137  
TAILS: 13420-2010-CPA-0123

Meline Skeldon  
BRAC Environmental Coordinator  
U.S. Army Reserve  
88th Regional Support Command  
60 South O Street  
Fort McCoy, Wisconsin 54656

Subject: Closure of the Sgt. Jerome F. Sears USARC in Portland, Oregon

Dear Meline Skeldon,

The U.S. Fish and Wildlife Service (Service), Oregon Fish and Wildlife Office, acknowledges receipt of your 4 June 2010 letter, received in our office 9 June 2010, regarding the proposed closure of the Sgt. Jerome F. Sears USARC. We understand the relocation of the Armed Forces Reserve Center (AFRC) and the impact of the AFRC on Camp Withycombe, OR was covered in a separate NEPA document.

We have reviewed the documentation you provided relative to the closure of Sears USARC, located at 2731 SW Multnomah Boulevard in Portland, Oregon. The 4 acre site contains four buildings and is primarily covered in pavement with some landscaped areas. Based on available information regarding listed threatened or endangered species under the Service's jurisdiction that may occur in Multnomah County, and knowledge of the site, we have no information that indicates listed or proposed species or their habitats are present. The Service has no other issues related to the conservation, protection, or management of fish and wildlife resources at the site.

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If you have any questions about this technical assistance, please contact Stephen Wille at (503) 231-6179.

Stephen A. Wille  
Fish and Wildlife Biologist  
U.S.D.I. - Fish and Wildlife Service  
Oregon Fish and Wildlife Office  
2600 S.E. 98th Avenue, Suite 100  
Portland, Oregon 97266-1398

Phone (503) 231-6179  
Fax (503) 231-6195  
[Steve.Wille@fws.gov](mailto:Steve.Wille@fws.gov)

Classification: UNCLASSIFIED  
Caveats: FOUO

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#### A.4 Agency and Public Notices

Per requirements specified in 32 CFR Part 651.4, a 30-calendar-day review period (starting with the publication of the NOA) was established to provide all agencies, organizations, and individuals with the opportunity to comment on the EA and FNSI. A NOA was published in local and regional newspapers to inform the public that the EA and FNSI were available for review. The newspapers were:

- Portland Tribune
- The Oregonian

The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and FNSI for review, listed where paper copies of the EA and FNSI could be reviewed, and advised the public that an electronic version of the EA and FNSI were available for download at the following Web site: [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm).

The EA was available for public review and comment at the following libraries:

- Multnomah County Library - Hillsdale, 1525 SW Sunset Boulevard, Portland, Oregon 97239;
- Multnomah County Library – Capital Hill, 10723 SW Capital Highway, Portland, Oregon 97219.

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## APPENDIX B – AIR CONFORMITY APPLICABILITY ANALYSIS

### Introduction

A General Air Conformity Applicability Analysis was conducted to determine if increases in air pollution from the construction project associated with the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the Sears USARC, Portland, Oregon would impact National Ambient Air Quality Standards (NAAQS). The project will occur within a US Environmental Protection Agency (USEPA) designated moderate non-attainment area and is therefore subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.

The 1990 amendments to the Federal CAA, Section 176 required the USEPA to promulgate rules to ensure that federal actions that produce emissions of any criteria air pollutants for which an area is not in attainment conform to the appropriate SIP. These resulting rules, known together as the General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), require any federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the General Conformity Rule's requirements or positively determine that the action conforms to the provisions and objectives of the applicable State Implementation Plan (SIP).. Any mitigation deemed necessary as a result of the conclusions reached in the conformity analysis would be implemented and integrated into the ODEQ SIP.

The General Conformity Rule requires an assessment of the potential magnitude of potential total emissions of non-attainment criteria pollutants, including their precursors, associated with a proposed federal action when determining conformity of that action. The rule does not apply to certain "exempt" actions or to actions where the total emissions of criteria pollutants are at or below specified *de minimis* levels. In addition, ongoing activities currently being conducted are exempt from the rule as long as there is no net increase in emissions above the specified *de minimis* levels. If the predicted emissions exceed the *de minimis* levels, a formal air conformity determination is necessary. If the *de minimis* levels are not exceeded, and if the predicted emissions do not exceed 10 percent of a non-attainment area's total emission budget for a given pollutant, a record of non-applicability must be prepared.

For purposes of determining a project's emissions, emissions are those directly associated with project activities at the time and location of the project. For the Proposed Action, emissions include those from routine operational activities and operation of permitted emission sources, as well as actual construction activities, construction vehicles and equipment, and any ancillary emissions sources.

### Project Description

The site consists of approximately 4 acres of developed land with four permanent structures:

- 24,104-square foot main administration building,
- 4,669-square foot Organizational Maintenance Shop (OMS)
- 5,084-square-foot storage building

- 
- Three-sided cinderblock hazardous materials (HAZMAT) structure

The administrative building and OMS buildings were constructed in 1960 and are concrete block and brick construction on a concrete slab. The storage building was constructed after 1994 and the HAZMAT storage structure was constructed in 1975. The administrative building contains offices classrooms, storage rooms, a boiler room, and a drill hall. The building received renovations in 2002 with drill hall renovations in 2004. The southern portion of the building is two-stories and contains the offices. The northern portion of the building is one story and consists of the drill hall.

The OMS building is a single story with three vehicle service bays. The OMS historically contained offices, a photo-developing room, a battery room, and a paint room. The single story storage building is constructed of corrugated metal with a sloped corrugated metal roof. A three-sided cinder block constructed HAZMAT storage structure is located east of the OMS building. A smaller metal HAZMAT storage shed is located adjacent to the three-sided structure. A military equipment parking area is located east of the OMS building and a privately owned vehicle parking area is located east of the administration building.

The main building was constructed on a concrete slab and contains office space, assembly space, a commercial kitchen, and classroom space. The assembly space (non-partitioned) accounts for 30 percent of the square footage (4,125 square feet). The OMS, also built on a slab, is a two bay maintenance garage with heat. Both buildings are of cement block construction.

## **Current Ambient Air Quality Considerations**

### **Emissions Evaluation**

The primary emission sources for this project will be those associated with demolition and construction activities, with demolition and paving being the predominant emission generating activities. Cumulative air emissions were calculated for various types of diesel-engine construction vehicles and related equipment. The project qualifies for the 40CFR 93.153 (c)(1) and (c) (2) (x) exemptions because the replacement activity emissions are clearly *de minimis* and below applicable threshold levels. The construction activity associated with this modification will result in a temporary negligible increase in air emissions as demonstrated in the calculations below. The calculations are included solely to demonstrate the project's negligible impact. A Regional Significance Review was not conducted as part of this evaluation due to the exemption clauses stated above.

### Emission Factors

Emission factors (EF) were obtained from a variety of resources. These include MOBILE6, AP-42, NONROAD 2005, and the South Coast Air Quality Management District Air Quality Handbook. Where feasible, the most conservative EFs were incorporated.

## Construction Emissions

Activity	Annual Emissions (TPY)	
	NO <sub>x</sub>	Ozone
New Building Construction	5.84	0.48
Building Demolition	0.75	0.30
<ul style="list-style-type: none"> <li>Assumes 33,857 ft<sup>2</sup> of demolition and 63,071 ft<sup>2</sup> of construction</li> <li>Represent 2011 Project Year Only</li> </ul>		

## Surface Disturbance

Activity	Annual Emissions (TPY)	
	NO <sub>x</sub>	Ozone
Site Preparation	0.1	0.0
Asphalt Paving	0.14	0.05
Concrete Paving	0.29	0.02
<ul style="list-style-type: none"> <li>Assumes a 4 acre parcel @ 53,302 ft<sup>2</sup> of asphalt and 8,680 ft<sup>2</sup> of concrete</li> <li>Represent 2011 Project Year Only</li> </ul>		

## Vehicle Emissions

Activity	Annual Emissions (TPY)	
	NO <sub>x</sub>	Ozone
Commuter Traffic	2.06	0.35
<ul style="list-style-type: none"> <li>Assumes 600 additional vehicles @ 15 miles/day</li> </ul>		

## Non-Road/Non-Mobile Source Emissions

Activity	Annual Emissions (TPY)	
	NO <sub>x</sub>	Ozone
Various Equipment Sources	0.03	0.02

## Heating Source Emissions

Activity	Annual Emissions (TPY)
	NO <sub>x</sub>
Various Equipment Sources	1.29

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### Painting/Solvent Emissions

Activity	Annual Emissions (TPY)
	Ozone
Paint and Solvents	0.73

### Summary of Emissions

	Annual Emissions (TPY)	
	NO <sub>x</sub>	Ozone
<b>All Activities Combined</b>	<b>10.5</b>	<b>1.95</b>
<b>2011 Project Year</b>	<b>7.15</b>	<b>1.60</b>

**ATTACHMENT 1 – RECORD OF NON-APPLICABILITY**

Project Name: Closure and Proposed Reuse of Sears US Army Reserve Center

Project Point of Contact:

David Moore  
Environmental Chief  
88<sup>th</sup> Regional Support Command

Project Dates: Approximately January 2<sup>nd</sup>, 2011 through October 31<sup>st</sup>, 2011

General Conformity under the Clean Air Act, Section 176 has been evaluated for the action described above according to the provisions set forth in 40 CFR 93, Subpart B. The General Conformity Rule applies to federal actions occurring in regions designated as being non-attainment for the National Ambient Air Quality Standards (NAAQS) or attainment areas subject to maintenance plans (maintenance area). *De minimis* threshold levels for applicable NAAQS constituents have been established for federal actions with the potential to have significant air quality impacts. Should a project or related action located in a non-attainment or maintenance area exceed *de minimis* levels, a general conformity analysis would be required.

The Sears USARC is located in Multnomah County, Oregon, which is designated as moderate maintenance area for ozone. As such, ozone precursor pollutants nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOC) also apply. A General Conformity Determination is not required because total maximum annual emissions from this project have been estimated below the *de minimis* threshold levels. Calculated emissions and their relation to *de minimis* levels established in 40 CFR 93.153 (b) are presented in the table below.

NAAQS Criteria Pollutant	Applicable Threshold Level (40 CFR 93.153 (b))	Estimated Emission Results (Reported as Tons/Year)-2011	Above/Below Threshold Level
Ozone	50	1.95	Below
NO <sub>x</sub>	100	9.57	Below

Multnomah County is in attainment for all other NAAQS criteria pollutants and therefore is not subject to air conformity review.

Supporting documentation and emission estimates can be found in Section 4.4 and Appendix B, respectively, of the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the Sgt. Jerome F. Sears United States Army Reserve Center, Portland, Oregon.



3/3/11

David Moore  
Environmental Chief  
88<sup>th</sup> Regional Support Command

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## APPENDIX C - EIFS REPORT

The basis of the EIFS analytical capabilities is the calculation of multipliers used to estimate the impacts resulting from BRAC-related changes in local expenditures or employment. The forecast inputs for the EIFS are as follows. It is assumed 60 percent of construction costs reflect materials and supplies; 30 percent for labor, and 10 percent for profit/overhead. The actual construction cost for changes in local expenditures is 60 percent of total project construction divided by the length of project. The change in employment is determined by finding the 30 percent labor number and then dividing by the Bureau of Labor Statistics Wages by area and occupation for construction and extraction workers in the Portland-Vancouver-Beaverton, Oregon Metropolitan Statistical Area (MSA). The following are the EIFS output data for construction and the Rational Threshold Value (RTV) for the Region of Influence (ROI) of Alternatives 3.

### EIFS REPORT

#### PROJECT NAME

**BRAC EA – Portland-Vancouver-Beaverton, Washington-Oregon Metropolitan Statistical Area  
Alternative 3**

#### STUDY AREA

41005 Clackamas, OR 41071 Yamhill, OR  
41009 Columbia, OR 53011 Clark, WA  
41051 Multnomah, OR 53059 Skamania, WA  
41067 Washington, OR

#### FORECAST INPUT

Change In Local Expenditures	\$8,400,000
Change In Civilian Employment	89
Average Income of Affected Civilian	\$47,230
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Military Living On-post	0

#### FORECAST OUTPUT

Employment Multiplier	4.92
Income Multiplier	4.92
Sales Volume - Direct	\$10,072,270
Sales Volume - Induced	\$39,483,310
Sales Volume - Total	\$49,555,580 0.04%
Income - Direct	\$5,208,909

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Income - Induced)	\$5,931,564	
Income - Total(place of work)	\$11,140,470	0.02%
Employment - Direct	123	
Employment - Induced	135	
Employment - Total	259	0.02%
Local Population	0	
Local Off-base Population	0	0%

### RTV SUMMARY

	Sales Volume	Income	Employment	Population
<b>Positive RTV</b>	8.68 %	8.16 %	2.89 %	1.41 %
<b>Negative RTV</b>	-7.42 %	-4.7 %	-4.38 %	-1.07 %

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## APPENDIX D - LEGAL AND REGULATORY FRAMEWORK FOR BRAC CLOSURE, DISPOSAL, AND REUSE PROCESS

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the Sgt. Jerome Sears USARC in Portland, Oregon. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission made the following recommendations concerning the Sears USARC:

***“BRAC Recommendation. Close Sears Hall United States Army Reserve Center in Portland, OR, close Sharff Hall United States Army Reserve Center in Portland, OR, and relocate units to a new Armed Forces Reserve Center on Camp Withycombe, OR. The new Armed Forces Reserve Center shall have the capability to accommodate Oregon National Guard units currently on Camp Withycombe and from the following Oregon Army Reserve National Guard Armories: Lake Oswego Armory, Maison Armory, and Jackson Band Armory, OR, if the state decides to relocate those National Guard units.”***

To implement these recommendations, the Army proposes to close the Sears USARC.

The law that governs real property disposal is the Federal Property and Administrative Services Act of 1949 (40 U.S.C., Sections 471 and following, as amended). This law is implemented by the Federal Property Management Regulations at Title 41 CFR Subpart 101-47. The disposal process is also governed by 32 CFR Part 174 (Revitalizing Base Closure Communities) and 32 CFR Part 175 (Revitalizing Base Closure Communities—Base Closure Community Assistance), regulations issued by DoD to implement BRAC law, and matters known as the Pryor Amendment and the President's Program to Revitalize Base Closure Communities

### Relevant Statutes and Executive Orders

A decision on how to proceed with the Proposed Action rests on numerous factors such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations, the Army is guided by relevant statutes (and their implementing regulations) and Executive Orders (EO) that establish standards and provide guidance on environmental and natural resources management and planning. These include the *Clean Air Act*, *Clean Water Act*, *Noise Control Act*, *Endangered Species Act*, *National Historic Preservation Act*, *Archaeological Resources Protection Act*, *Resource Conservation and Recovery Act*, and *Toxic Substances Control Act*. EOs bearing on the Proposed Action include:

EO 11988 (Floodplain Management)

EO 11990 (Protection of Wetlands)

EO 12088 (Federal Compliance with Pollution Control Standards)

- 
- EO 12580 (Superfund Implementation)
  - EO 12873 (Federal Acquisition, Recycling and Waste Prevention)
  - EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations)
  - EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks)
  - EO 13175 (Consultation and Coordination with Indian Tribal Governments)
  - EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds)
  - EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management)

These authorities are addressed in various sections throughout this EA when relevant to particular environmental resources and conditions. The full texts of the laws, regulations, and EOs are available on the Defense Environmental Network & Information Exchange website at <http://www.denix.osd.mil>.

### **Other Reuse Regulations and Guidance**

DoD's Office of Economic Adjustment published its *Community Guide to Base Reuse* in May 1995. The guide describes the base closure and reuse processes that have been designed to help with local economic recovery and summarizes the many assistance programs administered by DoD and other agencies. DoD published its *DoD Base Reuse Implementation Manual* to serve as a handbook for the successful execution of reuse plans. DoD and the US Department of Housing and Urban Development have published guidance (32 CFR Part 175) required by Title XXIX of the National Defense Authorization Act for Fiscal Year 1994. The guidance establishes policy and procedures, assigns responsibilities, and delegates authority to implement the President's Program to Revitalize Base Closure Communities (July 2, 1993), as endorsed through Congressional enactment of the Pryor Amendment.