

REVISED FINAL

**ENVIRONMENTAL ASSESSMENT
FOR BRAC 05 RECOMMENDATIONS FOR
CLOSURE OF THE
NORTH PENN MEMORIAL UNITED STATES ARMY RESERVE CENTER
NORRISTOWN, PENNSYLVANIA**



Prepared for:

U.S. Army Reserve 99th Regional Support Command

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February 2011

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DRAFT
FINDING OF NO SIGNIFICANT IMPACT (FNSI) FOR
BRAC 05 RECOMMENDATIONS FOR
CLOSURE OF THE
NORTH PENN MEMORIAL UNITED STATES ARMY RESERVE CENTER
NORRISTOWN, PENNSYLVANIA

Pursuant to the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508) for implementing the procedural provisions of the *National Environmental Policy Act* (NEPA) (42 U.S.C. 4321 et. seq.) and the U.S. Department of Army Regulation 32 CFR Part 651 (*Environmental Analysis of Army Actions*; Final Rule), as well as policy and guidance provided by the *Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act*, the U.S. Army conducted an environmental assessment (EA) of potential environmental effects associated with implementation of BRAC realignment actions.

Purpose and Need. On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure and reuse of the North Penn U.S. Army Reserve Center (USARC) and realignment of essential missions to other sites. This recommendation was approved by the President on September 23, 2005 and was forwarded to Congress, and on November 9, 2005, the recommendation 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 North Penn USARC, Norristown, Pennsylvania:

“Close the Reese United States Army Reserve Center in Chester, PA, the United States Army Reserve Organizational Maintenance Shop in Chester, PA, the Germantown Veterans Memorial United States Army Reserve Center in Philadelphia, PA, the Horsham Memorial United States Army Reserve Center in Horsham, PA, the ILT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, PA and the North Penn Memorial United States Army Reserve Center in Norristown, PA, and relocate units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove Joint Reserve Base, PA.”

One commenter on the EA noted that the USARC is physically located in Worcester Township. “Norristown” is part of the North Penn USARC’s legal description and mailing address. Both Norristown and Worcester Township are located in Montgomery County, Pennsylvania. In response to this comment, the EA was revised throughout to base the analysis of existing conditions and potential impacts on the physical location of the North Penn USARC.

Description of the Proposed Action. To support the BRAC recommendations, the Proposed Action includes closure of the North Penn USARC no later than September 15, 2011. After closure of the North Penn USARC, the Army will dispose of the property, which includes an administration building, an Organizational Maintenance Shop (OMS), an unheated storage building, a potable well pump house, and three former Nike Ajax underground missile silos.

Alternatives Considered. Three alternatives are evaluated in this EA.

Preferred Alternative. The Preferred Alternative is for the Army to close the North Penn USARC by September 15, 2011, and assign the property to the National Park Service under the Federal Lands to Parks Program for a public benefit conveyance of the entire parcel to Worcester Township, Pennsylvania. The property would be used for public park and recreational purposes as recommended by the North Penn USARC Local Redevelopment Authority (LRA).

Caretaker Status Alternative. The Army will secure the North Penn USARC after the military mission has ended to ensure public safety and the security of remaining government property and any required environmental remediation actions. Under this alternative, the Army would reduce maintenance levels to the minimum level for surplus government property.

The No Action Alternative. CEQ regulations require analysis of the No Action Alternative in an EA as the baseline against which the impacts of the Proposed Action and alternatives will be evaluated. Accordingly, the No Action Alternative is evaluated in this EA.

Factors Considered in Determining that an Environmental Impact Statement is not Required. Impacts were analyzed for land use, aesthetics and visual resources, air quality, noise, geology and soils, water resources, biological resources, cultural resources, socioeconomics, transportation, utilities, and hazardous and toxic substances. No significant environmental impacts would occur. The U.S. Fish and Wildlife Service, the Pennsylvania Department of Conservation and Natural Resources, the Pennsylvania Game Commission, the Pennsylvania Fish and Boat Commission, the Pennsylvania Historical and Museum Commission, and the State Historic Preservation Office concur with this conclusion.

Reuse could pose a potential adverse impact to child health and safety should they gain access to that portion of the property containing the OMS pad, the vehicle storage area, and the underground missile silos. The Army will take reasonable precautions to secure the portion of the property containing these areas prior to transfer. Mitigation would include fencing and locking the area to prevent unauthorized access. In addition, barriers to the entrances of the silos and other underground facilities would be secured by locks and welds to prevent unauthorized entry.

Further, Worcester Township would mitigate the long-term potential health and safety impacts to children by keeping that portion of the property containing the Nike underground missile silos and other underground facilities fenced and locked, maintaining the barriers that deny access to underground facilities, and taking appropriate measures to prevent unauthorized access to this area and the silos. Worcester Township will not allow public access to this area in the future without first implementing appropriate safety measures.

The Army will demonstrate and document compliance with Pennsylvania underground storage tank closure requirements. Further, prior to transfer, the Army will complete any remedial actions, if any are required, after Pennsylvania Department of Environmental Protection's review of the Phase II Environmental Condition of Property.

Conclusion. Based on the environmental impact analyses described in the EA, which is hereby incorporated into this FNSI, it has been determined that implementation of the Proposed Action would not have a significant impact on the quality of the natural or the human environment. Because no significant environmental impact would result from implementation of the Proposed Action, an environmental impact statement is not required and will not be prepared.

Public Comment. Public comment is invited for a period of 30 days after publication of the notice of availability in the *The Times Herald* and *The Philadelphia Inquirer*. A copy of the final EA and draft FNSI are available for public review at the Montgomery County - Norristown Public Library, 1001 Powell Street, Norristown, PA 19401. The documents are also located on the BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

Date: _____

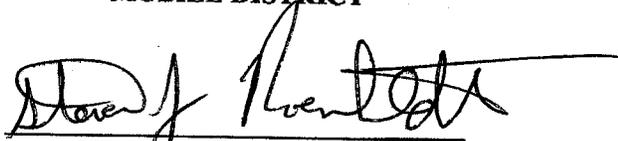
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**ENVIRONMENTAL ASSESSMENT
FOR BRAC 05 RECOMMENDATIONS
FOR CLOSURE OF THE
NORTH PENN MEMORIAL UNITED STATES ARMY RESERVE CENTER
NORRISTOWN, PENNSYLVANIA**

Prepared by:

**U.S. ARMY CORPS OF ENGINEERS
MOBILE DISTRICT**



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99th REGIONAL SUPPORT COMMAND



Chief, ENR Division

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ENVIRONMENTAL ASSESSMENT

LEAD AGENCY: Mobile District, U.S. Army Corps of Engineers

TITLE OF PROPOSED ACTION: Environmental Assessment for BRAC 05
Recommendations for Closure of the North Penn Memorial United States Army Reserve Center,
Norristown, Pennsylvania

AFFECTED JURISDICTIONS: Worcester Township, Montgomery County, Pennsylvania

PREPARED BY: U.S. Army Corps of Engineers, Mobile District, Commanding

TECHNICAL ASSISTANCE FROM: AGEISS Inc.

APPROVED BY: Approved by Jose E. Cepeda, U.S. Army Reserve

ABSTRACT: The U.S. Army Corps of Engineers is preparing environmental documentation for the proposed disposal and reuse of the North Penn Memorial United States Army Reserve Center, Norristown, Pennsylvania, as part of the restructuring of military bases through the Defense Base Closure and Realignment Act. This environmental assessment (EA) addresses the potential environmental, socioeconomic, and cultural impacts of this proposal and its alternatives.

Based on the environmental impact analyses described in this EA it has been determined that implementation of the Proposed Action would not have a significant impact on the quality of the natural or the human environment. Because no significant environmental impact would result from implementation of the Proposed Action, an environmental impact statement is not required and a Finding of No Significant Impact (FNSI) will be published in accordance with the *National Environmental Policy Act*.

REVIEW PERIOD: A Notice of Availability (NOA) has been published in *The Times Herald* and *The Philadelphia Inquirer*, which announces the beginning of the 30-day public review period. In the NOA, interested parties are invited to review and comment on the EA and Draft FNSI, and are informed that the EA and Draft FNSI are available via the World Wide Web at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm and at the Montgomery County - Norristown Public Library, 1001 Powell Street, Norristown, PA 19401. Reviewers are invited to submit comments on the EA and Draft FNSI during the 30-day public comment period via mail, fax, or e-mail to the following:

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EXECUTIVE SUMMARY

ES.1 Introduction

This environmental assessment (EA) analyzes the potential environmental impacts associated with the United States (U.S.) Army's Proposed Action to close the North Penn Memorial (North Penn) U.S. Army Reserve Center (USARC), Norristown, Pennsylvania as directed by the Base Realignment and Closure (BRAC) Commission's recommendations.

This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) (42 U.S.C. § 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.

ES.2 Setting

The address of the North Penn USARC is 1625 Berks Road, Norristown, Montgomery County, Pennsylvania. One commenter on the EA noted that the North Penn USARC is physically located in Worcester Township. "Norristown" is part of the North Penn USARC's legal description and mailing address. Both Norristown and Worcester Township are located in Montgomery County, Pennsylvania. In response to this comment, the EA was revised throughout to base the analysis of existing conditions and potential impacts on the physical location of the North Penn USARC. The North Penn USARC is bounded by farmland and single-family residences on the north, east, and west sides. Several Montgomery County agriculture programs exist that allow farmers to place an easement on property to prevent future commercial, residential, or industrial development of the land.

ES.3 Proposed Action

The Proposed Action follows the BRAC Commission's recommendations to close and reuse the North Penn USARC, Norristown, Pennsylvania.

ES.4 Alternatives

Three alternatives were analyzed in this EA: the Preferred Alternative: Traditional Disposal and Reuse, the Caretaker Status Alternative, and the No Action Alternative.

Preferred Alternative: Traditional Disposal and Reuse. Under this alternative, the Army would close the North Penn USARC by September 15, 2011, and make a public benefit conveyance of the entire parcel to Worcester Township for public park and recreational uses under the Federal Lands to Parks Program, as recommended by the North Penn USARC Local Redevelopment Authority (LRA) in its Reuse Plan. The reuse plan includes reuse of the administration building by the community, storage, paved trails, tennis courts, volleyball courts, basketball courts, and an ice skating rink. One wing of the administration building may be demolished. The LRA proposes to connect trails at the site to nearby municipal park system trails for multi-use purposes. This alternative is the Army's Preferred Alternative.

Caretaker Status Alternative. From the time of operational closure until conveyance of the property, the Army would provide maintenance to preserve and protect the site and items of equipment needed for reuse in an economical manner that facilitates redevelopment. If the North

Penn USARC 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 required by 41 CFR 101-47.402, 41 CFR 101-47.4913, and Army Regulation 420-70, *Buildings and Structures*.

No Action Alternative. Under the No Action Alternative, the Army would continue operations at the North Penn USARC at levels similar to those that occurred prior to BRAC 2005 Commission's recommendations for closure becoming final. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated.

ES.5 Environmental Consequences

Twelve resource areas were characterized and evaluated for potential impacts from the Preferred Alternative, the Caretaker Status Alternative, and the No Action Alternative.

Under the Preferred Alternative, land use would change from a military site to parkland/recreational uses. This change in land use would be compatible with the existing planning document and zoning for the site. Short-term beneficial impacts to socioeconomics would occur during demolition activities as a result of increased employment and local expenditures. Short-term impacts to air quality, aesthetics, noise, geology and soils, traffic, biological resources, water resources, utilities (solid waste), and hazardous and toxic substances (hazardous waste management) would occur during demolition and construction activities from ground disturbance; the presence of workers, vehicles, and equipment; and the generation of dust and vehicle exhaust. Friable and nonfriable asbestos-containing material and lead-based paint have been identified in the buildings at the North Penn USARC. Demolition and disposal would be accomplished in accordance with appropriate environmental laws, rules, and regulations of the U.S. Department of Defense, U.S. Environmental Protection Agency, and the state of Pennsylvania. Implementation of the Preferred Alternative would have a beneficial impact on the environmental condition of the property.

In the long term, compared to existing conditions, it is likely there would be an increase in traffic resulting from community use of the park, compared to the three full-time personnel and troops currently assigned to the facility. This increase in traffic would not cause significant impacts to the resource areas affected; the quantity of air emissions from personal vehicles would not significantly contribute to Montgomery County's total vehicle emissions, and the impacts to aesthetics and noise would be minor.

Beneficial impacts to aesthetics and biological resources would occur as new trails and recreational areas are developed and new vegetation is added. Reuse of the area for recreation would result in increased access to the property by children. This reuse could pose a potential adverse impact to child health and safety should they gain access to that portion of the property containing the Organizational Maintenance Shop pad, the vehicle storage area, and the underground missile silos. Mitigation measures to prevent unauthorized access are described below.

Under the Caretaker Status Alternative, land use would change from a functioning military site to one under limited maintenance in caretaker status. A decrease in the military presence at the

North Penn USARC would result in decreased impacts to air quality, biological resources, traffic, utilities, and hazardous and toxic substances as compared to existing conditions. However, because of the low magnitude of these existing impacts, no significant changes to the environment would occur.

Under the No Action Alternative, the Army would continue to use the North Penn USARC. No changes to the existing environment would occur.

Cumulative Impacts. Cumulative effects are those environmental impacts that result from the incremental effects of other past, present, or reasonably foreseeable future actions when combined with the Proposed Action. Two reasonably foreseeable projects have been identified. Cumulative impacts would not be significant.

ES.6 Mitigation Responsibility

The 99th RSC will take reasonable precautions to secure the portion of the property containing the Organizational Maintenance Shop pad, the vehicle storage area, and the underground missile silos prior to transfer. Mitigation would include fencing and locking the area to prevent unauthorized access. In addition, barriers to the entrances of the silos and other underground facilities would be secured by locks and welds to prevent unauthorized entry.

Further, Worcester Township would mitigate the long-term potential health and safety impacts to children by keeping that portion of the property containing the Nike underground missile silos and other underground facilities fenced and locked, maintaining the barriers that deny access to underground facilities, and taking appropriate measures to prevent unauthorized access to this area and the silos. Worcester Township will not allow public access to this area in the future without first implementing appropriate safety measures.

ES.7 Findings and Conclusions

Direct, indirect, and cumulative impacts of the Preferred Alternative, the Caretaker Status Alternative, and the No Action Alternative have been considered. No significant impacts would occur. Cumulative impacts analysis resulted in no significant impact. Therefore, the issuance of a Finding of No Significant Impact is warranted, and preparation of an environmental impact statement is not required.

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LIST OF ACRONYMS

ACM	asbestos containing material
BRAC	Base Realignment and Closure
CEQ	Council on Environmental Quality
CFR	<i>Code of Federal Regulations</i>
CO	carbon monoxide
dB	decibels
dBA	A-weighted sound level measurements
DoD	U.S. Department of Defense
EA	environmental assessment
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FNSI	Finding of No Significant Impact
LBP	lead-based paint
LRA	Local Redevelopment Authority
mg/kg	milligrams per kilogram
NAAQS	National Ambient Air Quality Standards
NEPA	<i>National Environmental Policy Act</i>
North Penn USARC	North Penn Memorial United States Army Reserve Center
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone
OMS	Organizational Maintenance Shop
PADEP	Pennsylvania Department of Environmental Protection
Pb	lead
PECO	Pennsylvania Electric Company
PHMC	Pennsylvania Historical and Museum Commission
PM _{2.5}	2.5 microns particulate matter
PM ₁₀	10 microns particulate matter
RCRA	Resource Conservation and Recovery Act
ROI	region of influence
RONA	Record of Non-Applicability
RSC	Regional Support Command
SDWA	Safe Drinking Water Act
SO ₂	sulfur dioxide
U.S.	United States
USAR	United States Army Reserve
USARC	United States Army Reserve Center
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
VOCs	volatile organic compounds

1.0 INTRODUCTION

This environmental assessment (EA) analyzes the environmental impacts of the proposed closure and reuse of the North Penn Memorial (North Penn) United States Army Reserve Center (USARC), Norristown, Pennsylvania (Figure 1-1). This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) [42 United States Code (U.S.C.) § 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 North Penn USARC (Figure 1-1) and realignment of essential missions to other sites. This recommendation was made in conformance with the provisions of the BRAC Act of 1990, Public Law, 101-510, as amended. 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 the NEPA of 1969 and its implementing regulations, the Army has prepared this EA to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.

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; U.S. Fish and Wildlife Service (USFWS); Native American Tribes; federal, state and local regulatory agencies; state and local governments; non-governmental organizations; individuals; and others as appropriate.

The Army began a 30-day public review period on December 20, 2010 by placing a Notice of Availability of the final EA and draft Finding of No Significant Impact (FNSI) in a local newspaper, *The Times Herald*, and a regional newspaper, *The Philadelphia Inquirer*. The EA and draft FNSI were available at the Montgomery County - Norristown Public Library and on the BRAC website. The Army invited the public and all interested and affected parties to review and comment on the EA and draft FNSI. One comment letter was received from Mr. David R. Burman, Township Manager, Worcester Township. Appendix E contains a copy of this letter, as well as the Army's responses to the comments.

One commenter on the EA noted that the North Penn USARC is physically located in Worcester Township. "Norristown" is part of the North Penn USARC's legal description and mailing address. Both Norristown and Worcester Township are located in Montgomery County, Pennsylvania. In response to this comment, the EA was revised throughout to base the analysis of existing conditions and potential impacts on the physical location of the North Penn USARC. Further, due to a malfunction with the email address provided in the original Notice of Availability, the Army will begin another 30-day public review period by placing a Notice of Availability in the newspapers noted above. The Army is requesting that comments previously submitted electronically to Ms. Murphy be re-submitted as directed below. The EA and draft

FNSI will be available at the Montgomery County - Norristown Public Library, 1001 Powell Street, Norristown, Pennsylvania, 19401 and on the BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. Comments and requests for information should be submitted to the United States Army Reserve (USAR) 99th Regional Support Command (RSC): Ms. Amanda Murphy at 609-521-8047 or amanda.w.murphy.ctr@us.army.mil.

At the end of the 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 to prepare an environmental impact statement in the *Federal Register*.

2.0 DESCRIPTION OF THE PROPOSED ACTION

The BRAC Commission's recommendation is to:

*“Close the Reese United States Army Reserve Center in Chester, PA, the United States Army Reserve Organizational Maintenance Shop in Chester, PA, the Germantown Veterans Memorial United States Army Reserve Center in Philadelphia, PA, the Horsham Memorial United States Army Reserve Center in Horsham, PA, the 1LT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, PA and the **North Penn Memorial United States Army Reserve Center in Norristown, PA**, and relocate units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove Joint Reserve Base, PA.”*

The Proposed Action, disposal and reuse, follows the BRAC Commission's recommendation to close the North Penn USARC, 1625 Berks Road, Norristown, Pennsylvania. Although “Norristown” is part of the legal description and mailing address for the USARC, the USARC is located within Worcester Township.

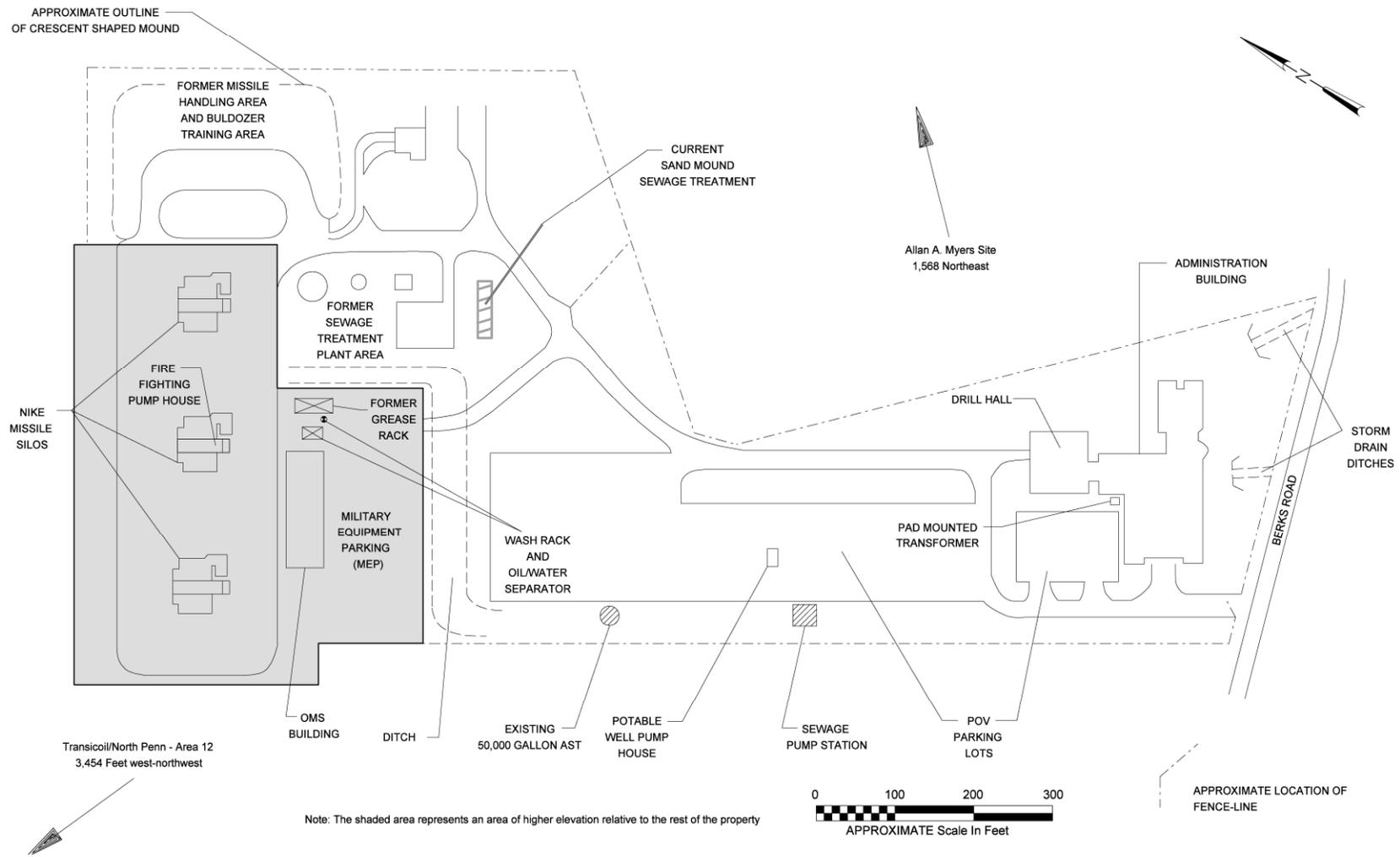
In 1954, the U.S. Government purchased 19 acres of agricultural land, located at 1625 Berks Road, to construct a Nike air defense launch site. The property was used as part of the Nike Ajax missile systems from 1954 to 1968. The U.S. Army occupied the property from 1954 to 1968, after which it was reassigned to the USAR to construct and operate the North Penn USARC. Figure 2-1 shows the North Penn USARC site plan.

Currently, the property has seven permanent structures:

- ◆ 45,000-square-foot main administration building (Figure 2-2)
- ◆ 6,800-square-foot Organizational Maintenance Shop (OMS) (Figure 2-3)
- ◆ 707-square-foot unheated storage building (Figure 2-3)
- ◆ 54-square-foot potable well pump house (Figure 2-4)
- ◆ Three former Nike Ajax missile vaults, filled with water (Figure 2-5)

The administration building consists of a two-story, precast concrete and structural steel frame, slab-on-grade building. The OMS, potable pump house, and firefighting pump house buildings are each one story and constructed of steel and brick. The Nike Ajax missile vaults are constructed underground and are lined with steel-reinforced concrete. A locked steel grate secures stairwells that lead into the vaults. A military equipment parking area and a privately-owned vehicle parking area are also on the site.

Approximately half of the site is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. The remaining land is grass with trees around the privately-owned vehicle parking lot and administration building. A bermed area covered with grass and weeds is piled about 6 to 8 feet high on the northeastern portion of the site. Chain-link security fencing topped with barbed wire encloses the North Penn USARC (USACE Louisville 2007). The site is currently used by two Army units consisting of engineering, transportation, firefighters, and legal support personnel (Adams 2010).



USARC United States Army Reserve Center

Source: CH2M HILL, Final Environmental Condition of Property Report, April 2007

Prepared For:
 U.S. Army Corps of Engineers, Mobile District

Figure 2-1
 Site Plan for North Penn USARC, Norristown, PA



Figure 2-2. Administration Building North Penn USARC, Norristown, PA.



Figure 2-3. OMS and Unheated Storage Building North Penn USARC, Norristown, PA.



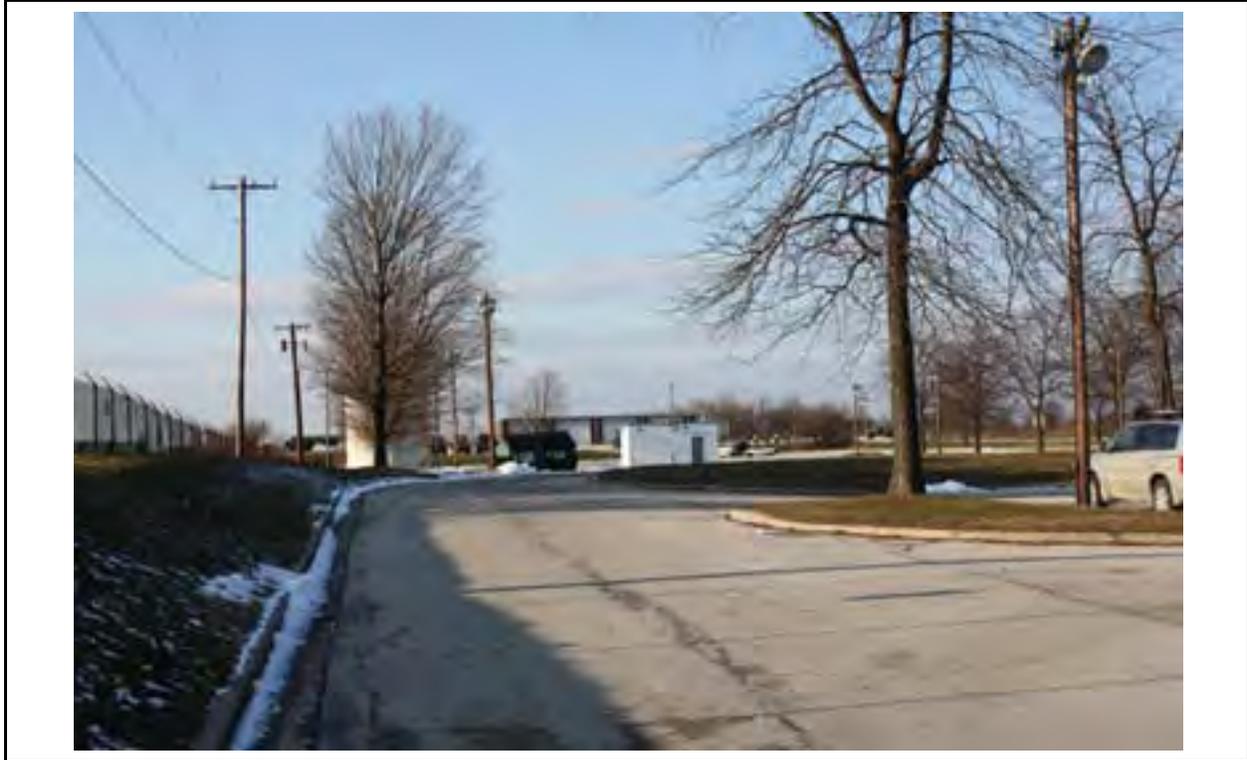
Figure 2-4. Potable Well Pump House and Water Tank North Penn USARC, Norristown, PA.



Figure 2-5. Nike Missile Vaults North Penn USARC, Norristown, PA.



Figure 2-6. View Along West Fence Line of the North Penn USARC, Norristown PA.



Under BRAC law, the Army must close the North Penn USARC not later than September 15, 2011. After the North Penn USARC is closed, the Army will dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the U.S. Department of Defense (DoD) and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

At a public meeting on April 19, 2006, the Board of Supervisors of Worcester Township, Pennsylvania passed a resolution establishing the North Penn USARC Local Redevelopment Authority (LRA) for the purpose of formulating a recommendation for the reuse of the North Penn USARC (LRA undated). According to the *Federal Property Administrative Services Act of 1949* and the *Base Closure Community Redevelopment and Homeless Assistance Act of 1994*, the LRA screened this Federal Government surplus property by soliciting notices of interest from state and local governments, representatives of the homeless, and other interested parties. Following a review of the property reuse options available to them, the LRA voted unanimously to recommend that the North Penn USARC be transferred for reuse to Worcester Township for public park and recreational uses under the Federal Lands to Parks Program. Based upon the LRA recommendation, the Army proposes to dispose of the North Penn USARC as a single parcel for public benefit conveyance that will facilitate the establishment of a park.

3.0 ALTERNATIVES

3.1 Preferred Alternative: Traditional Disposal and Reuse

For the Preferred Alternative, the Army would close the North Penn USARC by September 15, 2011, and assign the property to the National Park Service under the Federal Lands to Parks Program for a public benefit conveyance of the entire parcel to the Worcester Township. The property would be used for public park and recreational purposes as recommended by the North Penn USARC LRA in its Reuse Plan. Appendix A contains a copy of the North Penn USARC Reuse Plan.

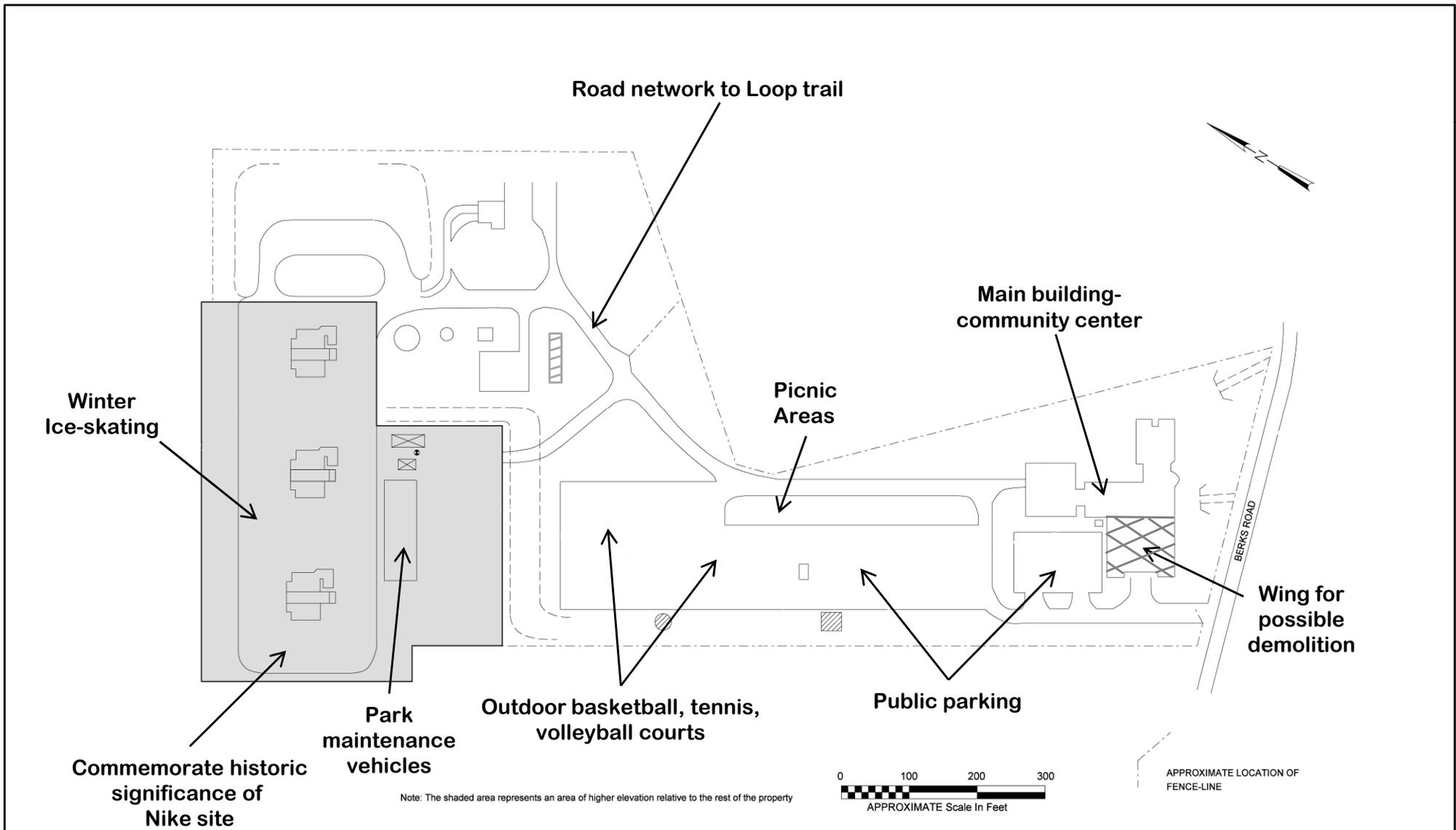
The proposed reuse of the property is depicted in Figure 3-1. Various changes would be made under this expected reuse of the North Penn USARC. One wing of the main administration building may be demolished. The remainder of the administration building would be used by the community theater group as well as for Worcester Township Park & Recreation Department community programming and events. The OMS building and the unheated storage building would be used for storage. The Nike silos would be closed in place. The internal road and sidewalk system would be converted into a paved loop trail for various outdoor recreational opportunities. These trails would be made accessible to persons with disabilities. Portions of the large paved parking areas would be converted into tennis, volleyball, and basketball courts, and an outdoor ice skating rink. The site has good possibilities for future off-road trail connections to the township's municipal park system and to two proposed multi-use trail corridors. In addition, the area surrounding the perimeter of the site would be paved with gravel for use as a trail. The fencing would remain surrounding the site. Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and since there was a final LRA Reuse Plan upon which to base the NEPA analysis.

3.2 Caretaker Status Alternative

The Army will secure the North Penn USARC after the military mission has ended to ensure public safety and the security of remaining government property and any required environmental remediation actions. There may be a period between closure and the transfer of the North Penn USARC. This condition should not be permanent because Army policy is to dispose of closed military sites. From the time of operational closure until conveyance of the property, the Army will provide sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. If the North Penn USARC 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 as specified in 41 CFR 101-47.402, 41 CFR 101-47.4913, and Army Regulation 420-70, *Buildings and Structures*.

3.3 No Action Alternative

Under the No Action Alternative, the Army would continue operations at the North Penn USARC at levels similar to those that occurred prior to the BRAC 2005 Commission's recommendations for closure becoming final. Three full-time personnel and 139 reservists use the USARC. Drills take place three weekends a month, with an average drill weekend of 46 reservists and a maximum of 68 reservists one weekend a month. The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated. Therefore, the No Action Alternative is evaluated in this EA.



USARC United States Army Reserve Center

Source: CH2M HILL, Final Environmental Condition of Property Report, April 2007

Prepared For:
U.S. Army Corps of Engineers, Mobile District

Figure 3-1
Site Reuse Plan for North Penn USARC, Norristown, PA



3.4 Alternatives Considered and Eliminated From Further Analysis

3.4.1 EARLY TRANSFER AND REUSE

Under this alternative, the Army would take advantage of various property transfer and disposal methods that allow the reuse of contaminated property to occur before all remedial actions have been completed. One method is to transfer the property to a new owner who agrees to perform, or to allow the Army to perform, all remedial actions required under applicable federal and state requirements. Allowing the property to be transferred before cleanup is complete requires concurrence of environmental authorities and the governor of the affected state. The property must be suitable for the new owner's intended use, and the intended use must be consistent with protection of human health and the environment. Another method is to lease the property to a non-Army entity to allow reuse of the property during cleanup and then to transfer the property when all remedial actions have been completed.

Army policy encourages use of early transfer authorities when cleanup activities will take more than 4 years to complete. A site meeting with the Pennsylvania Department of Environmental Protection (PADEP) was conducted on July 29, 2009 (Dell'Olio 2009). At that time, the only remaining areas of concern on the property were a drainage ditch, a former 20,000-gallon heating oil underground storage tank (UST), and a former 5,000-gallon diesel UST. In July 2010, soil sampling was conducted to complete the environmental evaluation of the site and no chemicals of concern exceeded PADEP health-based standards. Since remedial investigation activities are expected to be completed in less than 4 years, the property is not a suitable candidate for early transfer, and this alternative was not carried forward for further analysis.

3.4.2 OTHER REUSE ALTERNATIVES

The North Penn USARC LRA screened this Federal Government surplus property by soliciting notices of interest 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 the *Redevelopment and Homeless Assistance Act of 1994*. There was no homeless provider interest in the property. At the conclusion of the process, the LRA had two notice of interest proposals to consider, one from the Methacton School District to use a portion of the site for a school bus facility and one from Worcester Township to acquire the site for use as a public park and for recreational purposes. The LRA recommended the proposal from Worcester Township in its Reuse Plan and this is described in the Preferred Alternative (Section 3.1).

Since the other alternative, the Methacton School District proposal, was not selected by the North Penn USARC LRA as its official Reuse Plan, it was not carried forward for further analysis in this EA.

4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

4.1 Introduction

This chapter describes the existing environmental and human resources that could potentially be affected by the Proposed Action and alternatives. The environment described in this chapter is the baseline for the consequences that are presented for each resource and each alternative. The region of influence (ROI), or study area for each resource category is the North Penn USARC and immediate surroundings, unless stated otherwise in the individual resource category discussion. Most of the baseline information was taken from existing documentation.

This chapter also describes potential impacts for each environmental and human resource. CEQ defines impacts at 40 CFR 1508.8, “Effects and impacts as used in these regulations are synonymous. Effects includes 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. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.”

For this EA, short-term impacts are defined as those impacts resulting from demolition or construction activities (e.g., those that are of temporary duration), whereas long-term impacts are those resulting from the proposed reuse of the site.

Significance criteria were developed for the affected resource categories, and for many resource categories, are necessarily qualitative in nature. Quantitative criteria can be established when there are specific numerical limits established by regulation or industry standard. Impacts are classified as significant or not significant based on the significance criteria. In the following discussions, to highlight adverse impacts for the decision maker, the impacts are considered adverse unless identified as beneficial.

4.2 Land Use

4.2.1 AFFECTED ENVIRONMENT

This section describes existing land use conditions on and surrounding the North Penn USARC. It considers natural land uses and land uses that reflect human modification. Natural land use classifications include wildlife areas, forests, and other open or undeveloped areas. Human land uses include residential, commercial, industrial, utilities, agricultural, recreational, and other developed uses. Management plans, policies, ordinances, and regulations determine the types of uses that are allowable, or protect specially designated or environmentally sensitive uses. The following sections discuss the regional geographic setting, location, and climate; site land use; surrounding land use; and current and future development.

4.2.1.1 Regional Geographic Setting, Location, and Climate

The North Penn USARC is located in the central portion of Montgomery County, Pennsylvania, within the Township of Worcester on the north-central side of the township. Worcester is a 16-square-mile township of the second class located 17 miles northwest of Philadelphia. Worcester Township is bordered on the east by East Norriton and Whitpain Townships, on the south by Lower Providence Township, on the west by Skippack Township, and on the north by

Towamencin and Upper Gwynedd Townships. For clarification, while “Norristown” is part of the legal description and mailing address for the USARC, the facility is located within Worcester Township, Montgomery County, Pennsylvania.

The average high temperature of Worcester is 64 degrees Fahrenheit. The coldest month is January, with an average high temperature of 39 degrees Fahrenheit. The warmest month is July with an average high temperature of 87 degrees Fahrenheit (weather.com 2011). The average annual rainfall is 47 inches per year, with a fairly consistent monthly distribution averaging between 2.9 inches (February) and 4.7 inches (May) (weather.com 2011).

4.2.1.2 Site Land Use

In 1954, the U.S. Army acquired 19 acres of farmland that would become the North Penn site. From 1954 to 1968, the site served as a Nike Ajax missile launch facility. In 1968, the site was converted to a USARC and designated for use as an outdoor training site. The site currently functions primarily as an administrative center and an outdoor training area for the 369th Firefighting Unit and 427th Transportation Detachment.

State police are currently using the largest room in the main administration building to train officers in searching for drugs and also outside for calibration of skid marks for accident investigation training. The OMS building is being used for storage of vehicles and rescue equipment. The 369th Firefighting Unit currently trains in a gravel area located outside the OMS. The 427th Transportation Detachment, a 21-person unit, returned from Iraq in April 2010.

Approximately 52 percent of the site is covered with impervious surfaces, such as asphalt parking area, driveways, concrete walkways, and building footprints. The remaining ground surface is grass-covered lawn areas. The North Penn USARC property is zoned as agricultural.

4.2.1.3 Surrounding Land Use

The area surrounding the USARC is zoned as agricultural and residential. The North Penn USARC is bounded by farmland and single-family residences on the north, east, and west sides. The nearest residence is across Berks Road, a rural two-lane road, approximately 30 feet to the south. Berks Road bounds the USARC to the south followed by the Gambone Brothers construction property, which primarily serves as a storage yard. The Center Square Golf Course is approximately 2,000 feet east-northeast of the USARC. The Transicoil/North Penn – Area 12 Comprehensive Environmental Response, Compensation, and Liability Act Superfund Site is located roughly 3,450 feet west-northwest of the USARC (USACE Louisville 2007).

4.2.1.4 Current and Future Development in the Region of Influence

There are no future projects planned in the immediate vicinity of the site. A Pennsylvania Electric Company (PECO) energy substation is planned to be built about 2 miles away from the North Penn USARC, and a hospital is planned to be built approximately 4 miles away from the site.

4.2.2 CONSEQUENCES

Considerations for impacts to land use include the land on and adjacent to the Proposed Action project area, the physical features that influence current or proposed uses, pertinent land use plans and regulations, and land availability.

Potential impacts to land use are considered significant if the Proposed Action would:

- Conflict with applicable ordinances and/or permit requirements;
- Cause nonconformance with the current general plans and land use plans, or preclude adjacent or nearby properties from being used for existing activities; or
- Conflict with established uses of an area requiring mitigation.

4.2.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, impacts to land use from closure, demolition, construction, and reuse would not be significant. Land use of the USARC would change from a military site to a community-based recreational facility.

The North Penn USARC buildings and real estate would be transferred to the National Parks Service for eventual transfer to Worcester Township through the Federal Lands to Parks Program. The site would be used for walking/biking/horseback riding trails, as these are in highest demand in the community. The administrative building would be used for community theater and Worcester Township Park & Recreation Department community programming and events. The OMS and firefighting storage buildings would continue to be used for storage purposes. These changes are compatible with zoning, ordinances, community land use plans, and existing land uses in the vicinity of the property. The reuse of this property for parks and recreational purposes would have minor, long-term, beneficial impacts to land use.

4.2.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, land use would change from an active military reserve center to a facility under caretaker status. Maintenance activities to preserve and protect the facilities would take place. These activities would not conflict with applicable ordinances, existing land use plans, or surrounding land use.

4.2.2.3 No Action Alternative

Under the No Action Alternative, the Army would continue to use the North Penn USARC and no land use changes or impacts would occur.

4.3 Aesthetics and Visual Resources

4.3.1 AFFECTED ENVIRONMENT

This section describes the existing aesthetic and visual resource conditions in the area of the North Penn USARC. Visual resources include natural and manmade physical features that provide the landscape its character and value as an environmental resource. Landscape features that form a viewer's overall impression about an area include landform, vegetation, water, color, adjacent scenery, scarcity, and constructed modifications to the natural setting.

The 19-acre site contains seven permanent structures and pavement resulting in approximately 52 percent cover by impervious surfaces. The remaining land is grass with trees and bushes around the privately-owned-vehicle parking lot and administration building. The administration building is a precast concrete and structural steel frame, slab on grade building. The building is an irregularly-shaped two-story structure, consisting of a two-story drill hall connected by a one-story enclosed corridor. The OMS, potable well pump house, and fire-fighting pump house buildings each are one story and are constructed of steel and brick. The Nike Ajax missile silos are constructed underground. A military equipment parking area is also present within the North Penn USARC. Chain-link security fencing topped with barbed wire encloses the USARC (USACE Louisville 2007).

The USARC is bounded on the north, east, and west sides by single-family homes and farmland. The nearest residence is across Berks Road, a rural two-lane road, approximately 30 feet to the south. Berks Road bounds the property to the south, followed immediately by a storage yard. A golf course is approximately 2,000 feet to the east-northeast of the property.

4.3.2 CONSEQUENCES

Potential impacts to aesthetic and visual resources are considered significant if the Proposed Action would substantially degrade the natural or constructed physical features in the area of the North Penn USARC that provide the area its character and value as an environmental resource. The magnitude of any impact would be primarily determined by the number of viewers affected, viewer sensitivity to changes, distance of viewing, and compatibility with existing land use.

4.3.2.1 Preferred Alternative: Traditional Disposal and Reuse

Potential impacts to aesthetics and visual resources from demolition, construction, and reuse would not substantially degrade the natural or constructed physical features in the area and would not be significant. Following closure of the North Penn USARC, the periodic military transport vehicular traffic would be replaced by primarily personal vehicle traffic. The buildings and pavement would remain, thus causing no impact to aesthetics, providing the property buildings and facilities are properly maintained.

Short-term adverse impacts to aesthetics would occur from ground disturbance; the presence of workers, vehicles, equipment; and the generation of dust and vehicle exhaust associated with the possible demolition of the administrative building classroom wing and the construction of the walking/equestrian trails. However, these impacts would be temporary and once demolition and construction are complete, the reclamation of the site would remove these visual impacts.

The nighttime lighting at the property is expected to remain the same, with only dim exterior building lighting on the OMS and administration buildings, resulting in no impact. With the outdoor activities changing from military training exercises to community-based recreation, the impacts of outdoor activities from a visual standpoint are expected to be beneficial. No potential impacts to aesthetic and visual resources are considered significant.

4.3.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, impacts to aesthetics that would substantially degrade natural or constructed physical features would not occur since the facilities would be properly maintained so that no deterioration occurs.

4.3.2.3 No Action Alternative

Under the No Action Alternative, the Army would continue to use the North Penn USARC and no impacts or changes to aesthetics and visual resources would occur.

4.4 Air Quality

4.4.1 AFFECTED ENVIRONMENT

This section describes the existing air quality conditions at and surrounding the North Penn USARC. Ambient air quality conditions are discussed first followed by emission sources in the area and greenhouse gas emissions.

4.4.1.1 Ambient Air Quality Conditions

The ambient air quality in an area can be characterized in terms of whether it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The *Clean Air Act* (42 U.S.C. 7401 et seq.) requires the U.S. Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment. National primary ambient air quality standards define levels of air quality which the EPA has determined as necessary to provide an adequate margin of safety to protect public health, including the health of “sensitive” populations such as children and the elderly. National secondary ambient air quality standards define levels of air quality which are deemed necessary to protect the public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. NAAQS have been established for six criteria pollutants: carbon monoxide (CO); lead (Pb); nitrogen dioxide (NO₂); ozone (O₃); particulate matter (which includes both particulate matter with an aerodynamic size less than or equal to 10 microns [PM₁₀] and less than or equal to 2.5 microns [PM_{2.5}]); and sulfur dioxide (SO₂). Table 4-1 lists the NAAQS primary standards for each criteria pollutant. There are no ambient standards for volatile organic compounds (VOCs), although VOCs and nitrogen oxides (NO_x) are considered to be precursor emissions responsible for the formation of ozone in the atmosphere.

Table 4-1. National Ambient Air Quality Standards.

Pollutant	Primary Standard
Carbon monoxide (CO)	
8-hour average	9 ppm
1-hour average	35 ppm
Lead (Pb)	
Quarterly average	1.5 $\mu\text{g}/\text{m}^3$
Nitrogen dioxide (NO₂)	
Annual arithmetic mean	0.053 ppm
1-hour	0.100 ppm
Ozone (O₃)	
8-hour average (2008 standard)	0.075 ppm
Particulate matter less than 10 microns (PM₁₀)	
24-hour average	150 $\mu\text{g}/\text{m}^3$
Particulate matter less than 2.5 microns (PM_{2.5})	
Annual arithmetic mean	15.0 $\mu\text{g}/\text{m}^3$
24-hour average	35 $\mu\text{g}/\text{m}^3$
Sulfur dioxide (SO₂)	
Annual arithmetic mean	0.03 ppm
24-hour average	0.14 ppm

Source: 40 CFR 50.4 through 50.13

$\mu\text{g}/\text{m}^3$ micrograms per cubic meter

ppm parts per million

General air quality monitoring is conducted in areas of high population density and near major sources of air pollutant emissions. Rural areas are typically not considered in such monitoring. Regions that are in compliance with the NAAQS are designated as attainment areas. Areas for which no monitoring data is available are designated as unclassified and are by default considered to be in attainment of the NAAQS. In areas where the applicable NAAQS are not being met, a non-attainment status is designated.

The North Penn USARC is located in Montgomery County, Pennsylvania, in EPA Region 3. Montgomery County is designated as in attainment of the NAAQS for CO, NO₂, PM₁₀, SO₂, and Pb. However, Montgomery County is designated as in non-attainment of the NAAQS for O₃ and PM_{2.5}. This designation requires the Commonwealth of Pennsylvania to develop and implement plans to improve air quality.

4.4.1.2 Air Pollutant Emissions at the Site

The North Penn USARC requires no air emission permits. The administration building contains two boilers as part of the heating, ventilation, and air conditioning system, but emissions from the boilers are not significant.

Three full-time personnel work at the North Penn USARC, with approximately 139 total reservists assigned to the facility. Three drill weekends per month average about 46 reservists

per weekend, with the maximum drill weekend of 68 reservists. The quantity of air emissions from personal vehicles does not significantly contribute to Montgomery County's total vehicle emissions.

4.4.1.3 Regional Air Pollutant Emissions Summary

Regional air pollutant emissions from reported sources are listed below in Table 4-2 for Montgomery County, Pennsylvania, for the year 2005, the most recent year available.

Table 4-2. Air Emissions Reported for Montgomery County, Pennsylvania, for Calendar Year 2005.

Pollutant	2005 Emissions (tpy) Total
Particulate matter less than 2.5 microns (PM _{2.5})	3,111
Particulate matter less than 10 microns (PM ₁₀)	15,518
Carbon monoxide (CO)	184,414
Nitrogen oxides (NO _x)	23,215
Sulfur dioxides (SO ₂)	5,507
Volatile organic compounds (VOC)	35,635

Source: EPA 2010a
tpy tons per year

The potential for radon gas exposure exists in the area of the North Penn USARC. Radon is a radioactive gas that comes from the natural decay of uranium and radium and exists in varying amounts in most soils. Because radon is a gas, it can move through soil and into the atmosphere or into a building structure. Prolonged exposure to high levels of radon can lead to lung cancer. The EPA's Map of Radon Zones assigns each of the counties in the United States into one of three zones based on radon potential. Montgomery County is assigned to Zone 1, with a predicted average indoor radon screening level greater than 4 picocuries per liter (EPA 2010b). Zone 1 is considered to have the highest potential for radon. Action to reduce exposures should be taken within the next few years for buildings with long-term radon concentrations between 4 and 10 picocuries per liter. For buildings with long-term radon concentrations between 10 and 100 picocuries per liter, action should be taken to reduce exposures within the next few months. Radon concentrations can be reduced by sealing radon entry routes into the building, creating better ventilation in any basement, or providing exhaust appliances such as furnaces with their own source of intake air. The most effective method for reducing radon levels is by installing a fan-driven ventilation system under a building. These systems remove the radon from below the foundation before it enters the building, draws it into pipes, and exhausts the radon into the atmosphere.

A site-specific radon survey was conducted at the North Penn USARC between November 15 and 17, 2004. Passive radon test kits were placed in randomly selected rooms in the OMS building, administration building, and the pump house. The average radon level in all three buildings was less than 0.7 picocuries per liter (USACE Louisville 2007).

4.4.1.4 Greenhouse Gas Emissions

The burning of fossil fuels, such as diesel and gasoline, emits carbon dioxide, which is a greenhouse gas. Greenhouse gases can trap heat in the atmosphere and have been associated with global climate change. Global warming is the name given to the increase in the average temperature of the Earth's near-surface air and oceans since the mid-20th century and its projected continuation. The Intergovernmental Panel on Climate Change, in its Climate Change 2007: Synthesis Report, has stated that warming of the climate system is now considered to be unequivocal (IPCC 2007) with global surface temperature increasing approximately 1.33 degrees Fahrenheit over the last 100 years.

The six major greenhouse gases are carbon dioxide, methane, nitrous oxide, sulfur hexafluoride, hydrofluorocarbons, and perfluorocarbons. Greenhouse gases are well mixed throughout the lower atmosphere, such that any emissions would add to cumulative regional and global concentrations of carbon dioxide and other greenhouse gases. Therefore, the effects from any individual source of greenhouse gases cannot be determined.

4.4.2 CONSEQUENCES

Potential impacts to air quality are considered significant if the Proposed Action would:

- Increase ambient air pollution above any NAAQS;
- Contribute to an existing violation of any NAAQS;
- Interfere with or delay timely attainment of NAAQS; or
- Impair visibility within any federally mandated Prevention of Significant Deterioration Class I area.

4.4.2.1 Preferred Alternative: Traditional Disposal and Reuse

Potential impacts to air quality from the closure, demolition, construction, and reuse would not be significant. Demolition and construction activities would be temporary and would occur in a localized area. The main USARC building contains asbestos and lead-based paint (LBP) as discussed in Section 4.13. Prior to any demolition, Worcester Township would be responsible for abatement of asbestos and LBP by trained and certified personnel and would ensure that no impacts to air quality from these substances would occur during demolition.

Air emissions generated from demolition and construction activities would include particulate matter, vehicle emissions, and increased wind-borne dust (i.e. fugitive dust). Best management practices would be implemented to minimize generation of fugitive dust. Best management practices typically use (but are not limited to) either wind speed reduction or water suppression strategies (or both) during construction by fencing or wetting areas of soil disturbance. A temporary increase in vehicle traffic on local streets would occur during demolition and construction due to truck traffic and the private vehicles of construction workers. The truck and private vehicle exhaust would be a source of pollutant emissions, but should have a negligible impact on long-term air quality due to the temporary nature of the demolition and construction activities.

Vehicle traffic from park visitors has not been estimated, but would probably be greater than the three full-time workers who currently travel to the North Penn USARC daily and the soldiers and firefighters who periodically travel to the facility. The proposed community theater would hold about 200 people, so about 100 vehicles could travel to the site once per month. Although vehicle emissions from the planned reuse would be greater than existing vehicle emissions, they would not be significant. The reuse plan for the administration building would require boilers as part of the heating, ventilation, and air conditioning system, but the emissions from the boilers should not be significantly different than the current heating, ventilation, and air conditioning system.

The small incremental changes in motor vehicle and boiler emissions from the reuse plan would not increase ambient air pollution above the NAAQS, would not contribute to existing violations of the NAAQS, and would not significantly contribute to, nor interfere with, timely attainment of the NAAQS for ozone or particulate matter.

The *Clean Air Act* does not permit the impairment of visibility within any federally mandated Prevention of Significant Deterioration Class I area. Class I areas include wildernesses and national memorial parks over 5,000 acres, national parks exceeding 6,000 acres, and all international parks. No Class I areas occur near the North Penn USARC and the small incremental change in emissions from the reuse plan would not impair visibility in the area. The Valley Forge National Historic Site, with a size of 3,500 acres, is less than 10 miles from the North Penn USARC, but it is not designated as a Class I area.

Section 176(c)(1) of the *Clean Air Act* requires federal agencies to ensure that their actions conform to applicable implementation plans for the achievement and maintenance of the NAAQS for criteria pollutants. To achieve conformity, a federal action must not contribute to new violations of standards for ambient air quality, increase the frequency or severity of existing violations, or delay timely attainment of standards in the area of concern (for example, a state or a smaller air quality region). Federal agencies prepare written Conformity Determinations for federal actions that are in or that affect NAAQS nonattainment or maintenance areas when the total direct or indirect emissions of nonattainment pollutants (or their precursors in the case of ozone) exceed specified thresholds. Conformity with the EPA-approved state implementation plan is demonstrated if the project emissions fall below the threshold value *de minimis* emissions. The Proposed Action in Montgomery County, Pennsylvania is located in an area that has been designated as a moderate nonattainment area for ozone (8-hour standard) and for PM_{2.5} (1997 standard). The *Clean Air Act* conformity threshold values for this area are 100 tons per year for the ozone precursor NO_x, 100 tons per year for the ozone precursor VOC, and 100 tons per year for PM₁₀ (40 CFR 93.153). PM_{2.5} is a subset of PM₁₀ and, by definition, a source is considered to be major for PM_{2.5} if it emits or has the potential to emit 100 tons per year of PM₁₀ (EPA 2005). The Proposed Action would not produce emissions that are greater than the threshold *de minimis* values for criteria pollutants as described above. Therefore, the Proposed Action falls into conformity with the EPA-approved state implementation plans and a written Conformity Determination is not required. A Record of Non-Applicability (RONA) documenting this determination is presented in Appendix B.

Carbon dioxide would be the predominant greenhouse gas generated during demolition, construction, and reuse activities. No major emission source would exist for the other

greenhouse gases during the proposed project. The carbon dioxide would be generated by vehicles and equipment that burn fossil fuels. The amount of carbon dioxide produced by the burning of fossil fuels from the Preferred Alternative would not be significant. The Preferred Alternative would not have a significant impact on greenhouse gas emissions, because the construction and operation of the USARC is not expected to cause direct emissions of 25,000 metric tons CO₂ equivalent or more, which is the CEQ proposed screening level for including a quantitative and qualitative assessment of greenhouse gas emissions in the NEPA analysis.

4.4.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, the quantity of air emissions from vehicle traffic would be reduced from the existing conditions. The daily vehicle traffic from the current three full-time workers and the periodic vehicle traffic from the three drill weekends per month would be eliminated. The number of maintenance workers, and thus the quantity of emissions from vehicle traffic, would be less than existing conditions.

The motor vehicle emissions from the Caretaker Status Alternative would not increase ambient air pollution above the NAAQS, would not contribute to existing violations of the NAAQS, and would not significantly contribute to, nor interfere with, timely attainment of the NAAQS for ozone or particulate matter. Visibility within a Prevention of Significant Deterioration Class I area would not be impaired. Therefore, the impacts to air quality would not be significant.

4.4.2.3 No Action Alternative

Under the No Action Alternative, the North Penn USARC would continue functioning under the existing baseline conditions. No changes or impacts would occur to air quality.

4.5 Noise

4.5.1 AFFECTED ENVIRONMENT

This section describes the existing noise conditions in the area of the North Penn USARC site. Noise measurement is discussed first, followed by noise sources in the area.

4.5.1.1 Noise Measurement

Noise is generally defined as unwanted sound. Sound is all around us; it becomes noise when it interferes with normal activities such as speech, concentration, or sleep. Noise associated with military sites is a factor in land use planning both on- and off-post. Noise emanates from vehicular traffic associated with new facilities and from project sites during construction. Ambient noise (the existing background noise environment) can be generated by a number of noise sources, including mobile sources, such as automobiles and trucks, and stationary sources such as construction sites, machinery, or industrial operations. In addition, there is an existing and variable level of natural ambient noise from sources such as wind, streams and rivers, wildlife and other sources.

Sound is measured with instruments that record instantaneous sound levels in decibels (dB). A-weighted sound level measurements (dBA) are used to characterize sound levels that can be sensed by the human ear. The typical measurement for quieter sounds, such as rustling leaves or a quiet room, is from 20 to 30 dBA. Conversational speech is commonly 60 dBA, and a home

lawn mower measures approximately 98 dBA. All sound levels discussed in this EA are A-weighted.

4.5.1.2 Noise Sources in the Area

No data exist for ambient noise in the area. Background noise levels in wilderness and rural areas typically range between 35 and 45 dBA. The primary sources of noise in rural residential and agricultural areas are roadway traffic and farm machinery on a seasonal basis. Background noise levels are approximately 40 dBA in rural residential areas and 45 dBA in agricultural cropland with equipment operating (EPA 1978).

The property is bounded to the north, east, and west by single-family homes and farmland. The nearest residence is to the south approximately 30 feet across a two-lane rural road (Berks Road).

The North Penn USARC employs three full-time permanent staff, with three drill weekends per month and a maximum of 68 reservists on the largest drill weekend. Aside from commuter traffic, activities performed at the facility do not add to ambient noise levels.

4.5.2 CONSEQUENCES

Potential noise impacts resulting from the Proposed Action are evaluated with respect to the potential for:

- Annoyance – noise can impact the performance of various every day activities such as communication and watching television in residential areas. Sound levels that cause annoyance vary greatly by individual and background conditions.
- Hearing loss – one-time exposure to an intense “impulse” sound such as an explosion or by long or repeated exposure to sounds at or above 85 dBA can cause hearing loss (NIDCD 2007).
- Sleep interference.

4.5.2.1 Preferred Alternative: Traditional Disposal and Reuse

Potential noise impacts from closure, demolition, construction, and reuse would not be significant. Annoyance, hearing loss, or sleep interference would not occur as a result of the Preferred Alternative.

Short-term noise impacts during possible demolition of an unused classroom wing within the administrative building and construction of gravel walking/equestrian trails around the perimeter of the property would include increased commuter traffic from construction workers and noise from large machinery such as trucks, tractors, cranes, bulldozers, dumpers, front-loaders, and excavators. This type of construction equipment generates noise levels of about 80 dBA to 88 dBA at 50 feet. At a distance of 500 feet, these noise levels drop to 60 to 68 dBA (EPA 1971). Worcester Township Ordinance Number 2010-225 stipulates the maximum permitted sound levels during daytime and nighttime hours. This code also indicates exceptions to the noise standards set forth in the ordinance including construction noise during daytime hours (Worcester Township 2010a). Noise created during construction operations would be subject to guidelines specified in a construction permit secured by the contractor.

The closest residence to the potential demolition site is located approximately 270 feet to the south. If a resident was standing outdoors at this distance, they would experience construction equipment noise levels ranging from about 65 to 73 dBA. This noise level would be equivalent to that made by a clothes dryer or window-mounted air conditioner (EPA 1978). The walls of the residential structure will further attenuate outside noise levels for persons inside the residence. As such, these residents would experience minor short-term adverse noise impacts from demolition.

Under this alternative, the North Penn USARC property would be used as a community park, where the primary source of noise would be vehicular traffic from personal vehicles. As the facility is expected to be well used by the community, a minor increase in vehicular traffic around the property is anticipated, causing minor adverse effects. Outdoor property maintenance activities, such as lawn mowing and landscaping should remain consistent with the current use of the property.

4.5.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, no new sources of noise or increases in noise levels would result. No new receptors of noise would be located within the property boundaries. A net decrease in traffic, and therefore traffic noise, would result from assigning the property to caretaker status.

4.5.2.3 No Action Alternative

Under the No Action Alternative, the Army would continue to use the North Penn USARC and no new sources of noise or increases in noise levels would result. No new receptors of noise would be located within the property boundaries.

4.6 Geology and Soils

4.6.1 AFFECTED ENVIRONMENT

This section describes the existing geology and soil conditions in the area of the North Penn USARC. Geologic and topographic conditions are discussed first, followed by soils, and prime farmland.

4.6.1.1 Geologic and Topographic Conditions

The North Penn USARC is flat to very gently sloping towards the southeast. The elevation of the site ranges from 460 to 450 feet above mean sea level. The average gradient at the surface is approximately 0.009 sloping down to the southeast (Gravity College 2010). The bedrock at the North Penn USARC is made up of sedimentary rocks that were deposited in a long, narrow, inland basin that formed when the continents of North America and Africa separated more than 200 million years ago (PADCNR 2010). The sedimentary rocks are comprised of red sandstone, shale, and conglomerate (Geology 2010).

Historical data of seismic activity indicate that earthquakes in Pennsylvania cause minor to no damage. The first significant earthquake felt in Pennsylvania occurred in 1737, but was not centered in the state. Ten earthquakes of intensity V or greater, on the Modified Mercalli Scale, were recorded originating in Pennsylvania. In addition, three earthquakes were felt in

Pennsylvania that originated in neighboring states. Several of these earthquakes caused minor damage (USGS 2010). Several intensity VI earthquakes in Pennsylvania history caused minor damage including broken dishes, plaster fallen from walls, downing of chimneys, and upset furniture (USGS 2010).

4.6.1.2 Soils

The North Penn USARC is covered by soils represented by three mapping units: the Readington silt loam (0 – 3 percent slopes), the Readington silt loam (3 – 8 percent slopes), and the Urban land unit. The central part of the North Penn USARC is covered by Urban land. This unit is comprised of pavement, buildings, and other artificially covered areas (USDA NRCS 2010). The perimeter of the parcel is covered by the Readington silt loam (0 – 3 percent slopes) which is characterized by moderately well drained soils, slow infiltration rate, and low susceptibility to wind erosion (USDA NRCS 2010). The Readington silt loam (0 – 3 percent slopes), the Readington silt loam (3 – 8 percent slopes), and the Urban land units cover approximately 2.0, 0.5, and 16.5 acres of the North Penn USARC, respectively (USDA NRCS 2010).

4.6.1.3 Prime Farmland

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is also available for these uses. Prime farmland could be cultivated land, pasture land, forest land, or other land, but it is not urban or built-up land or water areas (USDA NRCS 2010). Prime farmland is protected by the Farmland Protection Policy Act (7 CFR Parts 657 and 658). Of the 19 acres at the North Penn USARC, approximately 0.5 acre would be considered farmland of statewide importance and 2 acres would be considered prime farmland based on soil quality (Figure 4-1) (USDA NRCS 2010). Although approximately 2.5 acres of the North Penn USARC are considered prime farmland, the acreage is located in narrow strips along the perimeter of the parcel, with 61 percent less than 25 feet wide and 39 percent less than 50 feet wide. Because of the location and footprint of the prime farmland, the acreage is not considered suitable for farming.

40° 10' 59"

40° 10' 59"



40° 10' 37"

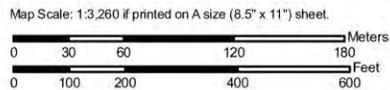
40° 10' 37"

Map Units

- ReA Readington silt loam, 0 to 3 percent slopes
- ReB Readington silt loam, 3 to 8 percent slopes
- UgB Urban land

Soil Ratings

- Not prime farmland
- Prime farmland



Web Soil Survey
National Cooperative Soil Survey

1/21/2010
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USARC United States Army Reserve Center

Prepared For:

U.S. Army Corps of Engineers,
Mobile District

Figure 4-1

Farmland at the North Penn USARC



4.6.2 CONSEQUENCES

Impacts to geology or soils are considered significant if the Proposed Action would:

- Expose people or structures to major geologic hazards;
- Cause substantial erosion or siltation;
- Cause substantial land sliding; or
- Cause substantial damage to project structures/facilities.

4.6.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, potential impacts to geology and soils from the Preferred Alternative would not be significant. Since geologic conditions indicate seismic activity in the area causes minor to no damage, redevelopment activities would not expose people or structures to major geologic hazards.

Soil disturbance would occur during demolition but would not be significant. Redevelopment activities would involve excavation, grading, tilling, and movement of heavy equipment at the North Penn USARC. These activities would disturb the surface soil, possibly increasing the potential for soil erosion by wind or runoff. Loss of soil by wind would be minimized by the use of water trucks, stockpile covering, and similar techniques. Off-site transport of silt or soil would be controlled by such methods as silt fencing. Erosion control during construction activities and new vegetation once construction is complete would minimize erosion of topsoil. Landslides would be unlikely with redevelopment activities of the Preferred Alternative, as the topography is flat with less than 1 percent slope.

Redevelopment as open space, trails, or parkland is not anticipated to result in adverse effects upon soils, as these are currently protected from erosion by the impermeable surfaces covering much of the site. Redevelopment of prime farmland would result in the addition of permeable equestrian and walking trails, with the remaining prime farmland left vegetated. Redevelopment of the area as trails is not anticipated to result in adverse effects upon prime farmland, because it is not considered suitable for farming due to the location and footprint of the prime farmland.

Operation and use of the community park would likely have little effect on geology or soils because the Preferred Alternative would not expose people or structures to major geologic hazards, would not cause substantial erosion or siltation, would not cause land sliding, or substantial damage to project structures and facilities.

4.6.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, no changes or impacts would occur to geologic or soil resources. The Caretaker Status Alternative would not expose people or structures to geologic hazards, cause substantial erosion, siltation, land sliding or cause damage to facilities.

4.6.2.3 No Action Alternative

Under the No Action Alternative, no changes or impacts would occur to geologic or soil resources.

4.7 Water Resources

4.7.1 AFFECTED ENVIRONMENT

This section describes water resources in the area of the North Penn USARC. Surface water includes lakes, rivers, and streams and is important for a variety of reasons, including economic, ecological, recreational, and human health. Groundwater comprises the subsurface hydrogeologic resources of the property's physical environment. This section also discusses floodplains and the storm water system. Wetlands are discussed in Section 4.8.1.4.

4.7.1.1 Surface Water

The North Penn USARC land surface slopes from the northwestern portion of the site to the southeast toward Berks Road and Stony Creek (Figure 2-1). Storm water ditches and pipes run northwest to southeast along the length of both boundaries of the property and discharge at the southeastern portion of the property into another ditch that is parallel to Berks Road. Stony Creek is located about 0.4 mile southeast of the property, and Zacharias Creek is located about 0.6 mile north-northwest of the property. The Schuylkill River is located about 4.5 miles south and discharges into the Delaware River, which is about 19 miles to the southeast. The Delaware River ultimately discharges into the Delaware Bay and the Atlantic Ocean. There is no flowing water on the North Penn USARC site (USACE Louisville 2007).

4.7.1.2 Groundwater

Both shallow and deep groundwater flow systems may be present at the North Penn USARC. Water from the shallow system likely discharges locally to streams and infiltrates downward to the deep system. Deep and shallow groundwater in the vicinity of the property flows generally west to east, following the topographic gradient. Cones of depression, caused by pumping groundwater from the sedimentary rocks of the Brunswick Group and the Lockatong Formations, extend preferentially along the strike of bedding planes or in the direction of fracture orientation (USACE Louisville 2007). The potable water at the site is currently supplied from a groundwater well on the North Penn USARC. The site complies with the *Safe Drinking Water Act* (SDWA) which ensures public health protection by requiring all public water systems to comply with all health-based standards, including all monitoring and reporting requirements. The groundwater at the North Penn USARC is monitored and has been tested for contamination and the testing results are discussed in Section 4.13.

4.7.1.3 Floodplains

According to the Federal Emergency Management Agency Flood Insurance Rate Map, Community Panel 42091C0262E, the North Penn USARC is not located in the 100-year floodplain (FEMA 2009).

4.7.1.4 Storm Water System

Storm water at the property is collected in drainage ditches, conveyed via storm drain pipes along the northwest and southwest sides, and discharged into two ditches at the southeast extent of the property. These two storm water drainage ditches discharge into another drainage ditch running parallel to Berks Road (USACE Louisville 2007).

Pennsylvania's storm water management program is administered by PADEP. The program is modeled after the federal National Pollution Discharge Elimination System (NPDES) program, requiring that storm water is treated to the maximum extent practicable. Under the Pennsylvania program, construction sites disturbing more than 1 acre, industrial sites, and Municipal Separate Storm Sewer Systems require permitting. Pennsylvania is drafting a comprehensive storm water management manual to establish state-level storm water treatment requirements, but currently has not established numeric storm water treatment requirements (Stormwaterauthority.org 2010).

4.7.2 CONSEQUENCES

Potential impacts to water resources, including surface water and groundwater are considered significant if the Proposed Action would:

- Irreversibly diminish water resource availability, quality, and beneficial uses;
- Reduce water availability or interfere with a potable supply or water habitat;
- Create or contribute to overdraft of groundwater or exceed a safe annual yield of water supply sources;
- Result in an adverse effect on water quality or an endangerment to public health by creating or worsening adverse health hazard conditions;
- Result in a threat or damage to unique hydrological characteristics; or
- Violate an established law or regulation that has been adopted to protect or manage water resources of an area.

Potential impacts to storm water conveyance systems are considered significant if the Proposed Action would:

- Cause flow obstructions or increases to storm water flow that the drainage system cannot handle;
- Accelerate deterioration of the storm water drainage system; or
- Cause long-term interruptions of storm water drainage system components.

4.7.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, potential impacts to water resources from the closure, demolition, construction, and reuse would not be significant. The Preferred Alternative would not significantly impact the groundwater from the Brunswick Group and the Lockatong Formations, the storm water conveyance systems at the North Penn USARC, nor significantly impact the water quality of Stony Creek, Zacharias Creek or the Schuylkill and Delaware Rivers.

The Preferred Alternative may result in the removal of a portion of the administration building at the USARC, currently a classroom wing. If the wing was demolished, only a slight decrease in impervious surfaces, which cover approximately 52 percent of the site, would occur resulting in increased area for surface water flow and increased infiltration to groundwater. This increase would be small and would not significantly affect surface water or groundwater resources. There would be no impact to the storm water system. The slight reduction in overall impermeable surfaces at the property would allow for slightly more infiltration of precipitation, resulting in slightly less storm water runoff.

Demolition of the classroom wing in the administration building could temporarily impact the storm water system by altering the flow of runoff across the site and potentially increasing sediment loading to the system as a result of erosion of exposed soils. Best management practices would be followed to limit exposed soils and storm water runoff, thus limiting resulting erosion of exposed soils and sediment loading to the storm water system. Adherence to Pennsylvania NPDES requirements and implementation of best management practices would reduce impacts to the storm water system at the North Penn USARC such that they would not be significant.

Construction of trails may temporarily disturb the surface water infiltration or flow; however, long-term changes to surface water are not anticipated. Redevelopment and reuse as open space, trails, or parkland are not anticipated to result in adverse effects upon surface water.

Groundwater is the source of potable water at the site and would be used as potable water for the park. The number of park visitors is not known at this time, but the township has less than 8,000 residents and less than 300 households responded to surveys regarding use of the various parks in the township (Lanzillo 2010). Therefore, a large number of people are not expected to use the open space, trails, or parkland at one time. A community theater at the site is estimated to hold about 200 people who may attend an anticipated six events per year. Overall, community visits are expected to be transitory and the community's use of potable water at the site is unlikely to significantly impact groundwater resources. This would not diminish water resource availability or interfere with the potable water supply.

Compliance with the SDWA ensures public health protection by requiring all public water systems to be monitored. The groundwater at the North Penn USARC is monitored and has been tested for contamination and the testing results are discussed in Section 4.13. The water system at the site would continue to comply with the SDWA when it becomes a public park.

4.7.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, no changes or impacts would occur to water resources. The Caretaker Status Alternative would not significantly impact the groundwater from the Brunswick Group and the Lockatong Formations, the storm water conveyance systems at the North Penn USARC, nor significantly impact the water quality of Stony Creek, Zacharias Creek or the Schuylkill and Delaware Rivers.

4.7.2.3 No Action Alternative

Under the No Action Alternative, no changes or impacts would occur to water resources.

4.8 Biological Resources

4.8.1 AFFECTED ENVIRONMENT

This section describes existing biological resources at the North Penn USARC. It focuses on plant and animal species or habitat types that are typical or are an important element of the ecosystem, are of special category importance (of special interest due to societal concerns), or are protected under state or federal law or statute regulatory requirement. Vegetation is discussed first, followed by wildlife, sensitive species, and wetlands.

4.8.1.1 Vegetation

Approximately 52 percent of the property at the North Penn USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints (USACE Louisville 2007). The remaining land is grass with trees around the privately-owned vehicle parking lot and administration building. A bermed open field area covered with successional weeds occurs on the northeastern portion of the property where the septic sand area occurred. *Rubus* species are mixed throughout the open area and a few eastern red cedar (*Juniperus virginiana*) and common honey locust (*Gleditsia triacanthos*) occur on the landscape. Large deciduous trees occur near some of the buildings and along the fenceline. Naturally occurring vegetation is limited on the site.

4.8.1.2 Wildlife

Since naturally occurring vegetation is limited at the North Penn USARC, most wildlife species are transients through the area. Although movement through the site is limited from the fencing, white-tailed deer (*Odocoileus virginianus*) occur in the area. Other opportunistic species likely to exist in this agriculture-residential interface include coyotes (*Canis latrans*), opossums (*Didelphis virginiana*), raccoons (*Procyon lotor*), and skunks (*Mephitis mephitis*). Avian species in the interface habitat also include rock doves (*Columba livia*), house sparrows (*Passer domesticus*), and starlings (*Sturnus vulgarus*).

4.8.1.3 Sensitive Species

The USFWS administers the *Endangered Species Act* of 1973 as amended. This law provides federal protection for species designated as federally endangered or threatened. An endangered species is “in danger of extinction throughout all or a significant portion of its range,” and a threatened species “is likely to become an endangered species within the foreseeable future” (USFWS 1988). Special status species are listed as threatened or endangered, are proposed for listing, or are candidates for listing by the state and/or federal government.

Under Section 7 of the *Endangered Species Act*, the Army is mandated to use its authority to ensure actions are approved, funded, or carried out to protect both flora and fauna that are considered threatened and endangered species or proposed for listing as threatened or endangered species on the North Penn USARC. In compliance with the *Endangered Species Act*, informal consultation has been conducted with the USFWS. No rare, threatened, or endangered species or natural communities of concern are known to occur in the vicinity of the project location. The small whorled pogonia (*Isotria medeoloides*), a federally threatened plant species, historically occurred in Montgomery County, but the county is not part of its current distribution. Thirty-six plant, one amphibian, and three bird species are listed by the state as species of concern (Table 4-3). The majority of the species require either prairie or moist habitats, including streams and bogs, which do not occur on the North Penn USARC. The Pennsylvania Natural Diversity Inventory Project Planning Environmental Review tool (PNDI 2010) was accessed to screen for potential species of special concern located in the project area. No known federal or state threatened and endangered species or special resources were identified within the project area.

Table 4-3. Federal and State-listed Endangered and Threatened Species Potentially Occurring in Montgomery County, Pennsylvania.

Common Name	Scientific Name	State Listing	Preferred Habitat ¹
Cattail Sedge	<i>Carex typhina</i>	PE	Wet woods, along occasionally flooding streams
Missouri Rock-cress	<i>Arabis missouriensis</i>	PE	Moist or dry, rocky or sandy woods
Narrow-leaved White-topped Aster	<i>Sericocarpus linifolius</i>	PE	Dry fields and open woods
Few Flowered Nutrush	<i>Scleria pauciflora</i>	PT	Serpentine barrens.
Jeweled Shooting-star	<i>Dodecatheon radicans</i>	PT	Moist, shaded areas of east and north facing limestone outcrops
Ellisia	<i>Ellisia nyctelea</i>	PT	Damp, shady stream banks
Stagger-bush	<i>Lyonia mariana</i>	PE	Moist, sandy areas
Slender Blue Iris	<i>Iris prismatica</i>	PE	Moist, well-drained soils
Sterile Sedge	<i>Carex sterilis</i>	PT	Bogs and calcareous inland fresh meadows
New York Aster	<i>Symphotrichum novi belgii</i>	PT	Moist meadows, thickets, and shores
Brook Lobelia	<i>Lobelia kalmia</i>	PE	Bogs, shores, wet meadows
Sandplain Wild Flax	<i>Linum intercursum</i>	PE	Dry, open sandplain grasslands or moors
Sweet Bay Magnolia	<i>Magnolia virginiana</i>	PT	Wetlands, particularly swamps and seepy woodlands.
Nodding Pogonia	<i>Triphora trianthophora</i>	PE	Dry to moist areas of beech-maple mesic forests
Balsam Poplar	<i>Populus balsamifera</i>	PE	Moist areas.
Grass-leaved Goldenrod	<i>Euthamia tenuifolia</i>	PT	Moist, sunny areas
Dwarf Huckleberry	<i>Gaylussacia dumosa</i>	PE	Bogs and wet, sandy soil
Beach Plum	<i>Prunus maritima</i>	PE	Sand dunes
Slender Cotton-grass	<i>Eriophorum gracile</i>	PE	Bogs and lake margins
Southern Red Oak	<i>Quercus falcata</i>	PE	Dry to moist woods, thickets, serpentine barrens, and on slopes
Tufted Buttercup	<i>Ranunculus fascicularis</i>	PE	Prairies and dry woods.
Spring Ladies'-tresses	<i>Spiranthes vernalis</i>	PE	Acidic soil, usually in moist, open sites
Eared False-foxglove	<i>Agalinis auriculata</i>	PE	Prairies, open dry woods and fields
Blunt Manna-grass	<i>Glyceria obtusa</i>	PE	Wetlands
Small-whorled Pogonia ²	<i>Isotria medeoloides</i>	PE	Dry east or southeast facing hillsides in mixed oak forests
Hooded Ladies'-tresses	<i>Spiranthes romanzoffiana</i>	PE	Bogs, moist meadows
Scirpus-like Rush	<i>Juncus scirpoides</i>	PE	Wetlands and moist soil
Downy Willow-herb	<i>Epilobium strictum</i>	PE	Bogs and swamps
Reflexed Flatsedge	<i>Cyperus refractus</i>	PE	Sandy shorelines and scoured river islands
Forked Rush	<i>Juncus dichotomus</i>	PE	Moist to damp old fields, marshes, openings, clearings, and ditches
Possum-haw	<i>Viburnum nudum</i>	PE	Wetlands, particularly swamps, wet thickets, and the margins of ponds
Tawny Ironweed	<i>Vernonia glauca</i>	PE	Successional clearings, dry fields, and upland forests.
Cross-leaved Milkwort	<i>Polygala cruciata</i>	PE	Wet, sandy meadows, moist pine barrens, marshes

Common Name	Scientific Name	State Listing	Preferred Habitat ¹
Bushy Cinquefoil	Potentilla paradoxa	PE	Moist or wet soil in full sun; riverbanks
Bicknell's Sedge	Carex bicknellii	PE	Moist to dry prairies and sand dunes
New Jersey Chorus Frog	Pseudacris triseriata kalmi	PE	Small, relatively open bodies of water with a mixture of shrubby and herbaceous aquatic vegetation
Upland Sandpiper	Bartramia longicauda	PT	Open country: large fallow fields, pastures and grassy areas
Bald Eagle	Haliaeetus leucocephalus	PT	Forested areas adjacent to large bodies of water
Yellow-crowned Night-heron	Nyctanassa violacea	PE	Prefers small shallow streams

1 Pennsylvania Natural Heritage Program 2010; Connecticut Botanical Society 2010

2 Federally listed species

PE = Pennsylvania endangered listing

PT = Pennsylvania threatened listing

The 99th RSC sent consultation letters to the USFWS, the Pennsylvania Game Commission, Pennsylvania Department of Conservation and Natural Resources, and the Pennsylvania Fish and Boat Commission on February 24, 2010. Copies of the letters are included in Appendix C.

4.8.1.4 Wetlands

Wetlands are classified by the U.S. Army Corps of Engineers based on three criteria: hydrology, soil type, and vegetation. Specifically, wetlands are defined as those areas that are saturated or inundated by water that is sufficient to support vegetation typically adapted to saturated soils (USACE 1987). Wetlands and other surface water features, which may include intermittent and perennial streams, are generally considered “waters of the United States” by the U.S. Army Corps of Engineers, and under its definition of “jurisdictional waters/features,” are protected under Section 404 of the *Clean Water Act*. No wetlands were identified on the North Penn USARC (USFWS 2010).

4.8.2 CONSEQUENCES

Potential impacts to biological resources are considered significant if the Proposed Action would:

- Affect a threatened or endangered species;
- Substantially diminish habitat for a plant or animal species;
- Substantially diminish a regionally or locally important plant or animal species;
- Interfere substantially with wildlife movement or reproductive behavior;
- Result in a substantial infusion of exotic plant or animal species; or
- Destroy, lose, or degrade jurisdictional wetlands (as defined by Section 404 of the *Clean Water Act*).

Executive Order (EO) 11990, *Protection of Wetlands*, requires federal agencies to avoid actions, to the extent practicable, which would result in the location of facilities in wetlands.

4.8.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, potential impacts to biological resources from the closure, demolition, construction, and reuse would not be significant. The Preferred Alternative would not cause adverse impacts to any federally-listed threatened or endangered species, for no such species are known to occur on the North Penn USARC. Both the Pennsylvania Department of Conservation and Natural Resources (letter dated March 4, 2010) and the Pennsylvania Game Commission (letter dated March 15, 2010) agreed that "...no known occurrences of species or resources of concern under their jurisdictions occur in the vicinity of the project..." No impacts to special status species are expected and further consultation with either of the agencies is unnecessary. In a letter dated May 5, 2010, the USFWS determined that the proposed project occurs within the known range of the federally threatened bog turtle. The USFWS further states that "...the bog turtle inhabits shallow, spring-fed fens, sphagnum bogs, and swamps..." and therefore "..... all wetlands in and within 300 feet of the project area should be identified." No wetlands are found on the project area and in a follow-up phone conversation with USFWS (May 10, 2010), it was determined that no further action was necessary for identifying potential bog turtle habitat (Dershem 2010). The Pennsylvania Fish and Boat Commission also did not have concerns that the Proposed Action would impact any waterways in the state (Bednarchik 2010). Copies of consultation letters are provided in Appendix C.

Minor adverse short-term impacts would occur during the demolition of the classroom wing and construction of the facilities and trails under the reuse plan. The large trees in the area would be protected from the demolition and would not be impacted, and maintaining the current fence during demolition would protect the forested native vegetation on the southeast end bordering the North Penn USARC. Additional short-term impacts would occur from the noise and dust generated by the demolition and construction. Best management practices to reduce the amount of airborne dust would help lessen potential short-term impacts to the biological resources. Wildlife may avoid the area due to the increase in noise during demolition and construction, and an increased chance of wildlife-vehicle interactions may occur with the increase in vehicles from construction equipment.

Although some short-term impacts from demolition and construction may occur, overall the Preferred Alternative would not cause any long-term negative impacts to the biological resources. Beneficial long-term impacts would occur as the area becomes more developed as a park setting with the inclusion of trails and vegetation. Increased use of the sparsely vegetated areas around the North Penn USARC complex by wildlife may occur; however, access to the area would still be restricted from the fence surrounding the site to most terrestrial wildlife. Park and community theater visitors would likely increase the use of the North Penn USARC site from its current use; however, use of larger vehicles would decrease and access would be limited to daylight hours. These limitations would be beneficial to wildlife using the area as most wildlife movements would occur during non-park use hours. Trail construction would likely include additional vegetation on the site which would improve wildlife habitat and provide additional coverage for wildlife using the area, therefore, providing long-term beneficial impacts.

4.8.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, no adverse impacts to biological resources would occur. Potential short-term positive impacts may be realized as the military presence on the site

decreases and the number of personnel, vehicles, and potential for interactions with wildlife decreases.

4.8.2.3 No Action Alternative

Under the No Action Alternative, no changes or impacts would occur to biological resources.

4.9 Cultural Resources

4.9.1 AFFECTED ENVIRONMENT

This section describes the existing cultural resource conditions in the area of the North Penn USARC. The prehistoric and historic background of the area is summarized first, followed by the status of cultural resource inventories and Section 106 consultations, and Native American resources.

4.9.1.1 Prehistoric and Historic Background

The Paleo-Indian Period (10,000 BC—8000 BC) began in Pennsylvania when the earliest Indians came here. By about 10,000 years ago most of the big game animals of the glacial age had become extinct, and the climate became more similar to the present. This was the Archaic period (8000 BC—1000 BC), and the Indians developed a new way of life to adapt to the changing environment using a device called the spear thrower or atlatl. It enabled the hunter to throw his spear farther and harder. During the Transitional Period (1800 BC—800 BC), at the latter part of the Archaic period and for several centuries afterward, there were people in eastern Pennsylvania who used soapstone bowls and broad spear points. Soapstone vessels permitted food to be boiled directly over fire. The Woodland Period (1000 BC—1550 AD) is marked by two important activities which earlier cultures did not have, agriculture and pottery making, and lasted until the first contacts with the European culture. Sites of the historic period (beginning around 1550 AD) are marked by objects of European manufacture. Competition for land and trade led to the constant wars of the early historic period and a general breakdown of the old order (Northcentral 2010).

The 99th RSC's roots began on July 23, 1918, with the headquarters of the 99th Division at Camp Wheeler, Georgia. Reconstituted on June 24, 1921, as the Headquarters Command 99th (Checkerboard) Division, it became part of the organized reserve in Pittsburgh, Pennsylvania. With the war in Europe over, the 99th was inactivated on September 27, 1945. Reactivated as the 99th U.S. Army Reserve Command on December 22, 1967, the 99th has since remained in the Army Reserve. After the 2005 BRAC recommendations, the DoD established a Northeast Regional Support Command Headquarters at Fort Dix, New Jersey, to further support the re-engineering and streamlining of the Command and Control structure of the Army Reserve (99th RSC 2009).

Historic aerial photographs and topographic maps dated as early as 1942 show the North Penn USARC property as open fields or used for agricultural production prior to U.S. Government ownership. Those maps show no pre-military structures present on the property. The U.S. Government purchased the property in 1954 and subsequently constructed a Nike Ajax missile launch facility. The property functioned as a Nike Ajax missile launch facility until 1964, after which it was converted to a USARC (Brockington 2010).

When it served as a Nike Missile launch facility, the property contained other buildings, including a barracks, a bachelors' officers quarters, a missile assembly and test building, a generator building, a paint shed, an acid storage shed, and a chemical storage shed. These buildings were located around the northeastern portion of the property, and were demolished around 1973-1974. Today, the only remaining architectural elements from the Nike Missile period include the underground storage silos, an underground sewage treatment plant, an unheated storage building, and a well pump house. Because of modernization of the Nike missile from the Ajax to Hercules variant, the property no longer functioned as a launch facility after 1964. At that time, it was transferred over to the USAR as a training site. Construction of the current USARC administration building and the OMS was completed in 1974 (Brockington 2010).

4.9.1.2 Status of Cultural Resource Inventories and Section 106 Consultations

Section 110 of the National Historic Preservation Act requires federal agencies to locate, inventory, and nominate to the National Register of Historic Places (NRHP) all resources that are recommended eligible for inclusion on the NRHP. In July 1995, a Cultural Resource Management Plan for the property was prepared. The purpose of the plan and subsequent report was to inventory 32 79th Army Reserve Command properties in central and southeastern Pennsylvania. To facilitate the cultural resource assessment for the Cultural Resource Management Plan, background research and a site visit were conducted. Research included an evaluation of historical documents, previous assessments, and a summary description of the facility and its surroundings. In addition, the components of the USARC were assessed for eligibility to the NRHP. The report concludes that no historic architectural resources were identified on the property, and none of the buildings at the site were found to meet the criteria for inclusion on the NRHP (KFS 1995). In addition, the investigators determined during earlier studies that the site did not have archeological site potential (99th RSC 2009).

In order to comply with Section 106 of the *National Historic Preservation Act of 1966*, Brockington and Associates conducted an assessment in January 2010 and confirmed the findings from 1995. In conducting this work, the area of potential effects was limited to the current legal boundary and all real property of the North Penn USARC. Prior to the field assessment, a thorough literature review was conducted to identify previously recorded archaeological sites and historic structures within, or adjacent to, the USARC property. There are no previously recorded archaeological sites or historic structures on the USARC property. No systematic archaeological survey has been conducted on the North Penn USARC property; however, the literature review revealed substantial ground disturbance through the construction and demolition of buildings and parking lots during the Cold War period when the property was used as a Nike Missile launch area. Because of the extent and pattern of these disturbances, the potential for identifying intact cultural deposits is low (Brockington 2010).

In addition, five buildings or structures located on the North Penn USARC were also evaluated as part of the 2010 assessment. These included the Main Reserve Center (Administration), OMS, and three Nike Ajax missile silos (with their ancillary structures: unheated storage building and potable well pump house). The administration building and OMS were constructed during the 1970s and do not possess significant historical associations that would render them eligible for inclusion on the NRHP. The unheated storage building and well pump house that

were constructed in the late 1950s were also evaluated. Both were evaluated for architectural and historical significance and neither is recommended eligible for the NRHP. The remaining structures on the North Penn USARC are three underground Nike Missile silos. There are few remaining components of the Nike Missile facility. These underground silos, or vaults, are lined with steel-reinforced concrete, and are accessed by both a stairwell and a vertical hatch. The chamber contained the elevator shaft and the control area, but few pieces of original equipment remain. Based on historic photographs of similar Nike facilities, the North Penn Nike chambers appear to retain their architectural integrity and original condition, though the electronic and mechanical equipment has been removed. However, the North Penn Nike-Ajax launch facility does not appear to retain sufficient architectural or engineering integrity or significant historical associations to be considered NRHP-eligible at the National or State levels of significance. The facility was one of twelve such bases around Philadelphia and one of hundreds constructed across the United States. The Library of Congress Historic American Engineering Record collection has numerous better documented examples of intact facilities, including those with surviving ancillary and support structures. Furthermore, these silos do not possess significant historical associations with the Cold War (Brockington 2010). The 2010 Cultural Resources Assessment is provided in Appendix D.

The Army has completed Section 106 consultation and coordination with the Pennsylvania State Historic Preservation Office via the Pennsylvania Historical and Museum Commission (PHMC). On March 9, 2010, the 99th RSC sent a consultation letter to the PHMC (Appendix C). On April 12, 2010 the PHMC responded to the 99th RSC stating they concurred that no further archaeological investigations are necessary; however, they required further information in order to conduct the review on historic structures (Appendix C). On, May 7, 2010 the 99th RSC submitted the required Historic Resource Survey Form with photographic attachments (received by the PHMC on May 10, 2010) (Appendix C). In a letter dated May 21, 2010, the PHMC gave concurrence that there are not NRHP-eligible historic buildings, structures, districts or objects in the area of the proposed project; therefore, consultation with the PHMC is complete (Appendix C).

4.9.1.3 Native American Resources

No Native American concerns regarding the Proposed Action have been identified. On February 17, 2010, the Army sent notification letters to seven federally-recognized tribes (Absentee-Shawnee Tribe of Indians of Oklahoma, Delaware Tribe of Western Oklahoma, Cayuga Nation of Indians, Onondaga Indian Nation, Oneida Indian Nation, Akwesasne Mohawk Nation, and Tonawanda Band of Seneca) regarding the Proposed Action. Copies of the notification letters, responses, and a Memorandum for the Record that shows attempted phone calls are included in Appendix C. To date, one tribe (Absentee-Shawnee Tribe of Indians of Oklahoma) is not interested in participating in the Section 106 process and one tribe (The Delaware Nation) is interested in participating in the Section 106 process. Consultation with The Delaware Nation will conclude by sending them a copy of the Final EA and the January 2010 Cultural Resources Assessment. No other comments have been received from the other five tribes, and it is therefore assumed they are not interested in participating in the Section 106 process.

4.9.2 CONSEQUENCES

Potential impacts to historic properties and/or archaeological resources are considered significant without a proper mitigation plan, if the Proposed Action would:

- Physically destroy, damage, or alter all or part of the property;
- Physically destroy, damage, alter or remove items from archaeological contexts;
- Isolate the property from or alter the character of the property's setting when that character contributes to the property's qualification for the NRHP;
- Introduce visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
- Neglect a property resulting in its deterioration or destruction; or
- Transfer, lease, or sell the property (36 CFR 800.9[b]) without a proper preservation plan.

4.9.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, potential impacts to cultural resources from closure, demolition, construction, and reuse would not be significant because no cultural or historical resources have been identified or thought to occur at the North Penn USARC. If, during construction, any potential historic or archaeological resource is uncovered or inadvertent discoveries are made of Native American human remains and associated funerary objects, sacred objects, or objects of cultural patrimony, the Cultural Resources personnel at the local and state levels would be contacted, in accordance with typical standard operating procedure for the accidental discovery of archaeological resources or Native American artifacts.

4.9.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, no changes or impacts would occur to cultural resources.

4.9.2.3 No Action Alternative

Under the No-Action Alternative, no changes or impacts would occur to cultural resources.

4.10 Socioeconomics

4.10.1 AFFECTED ENVIRONMENT

The analysis in this section has been revised; it is based on the physical location of the North Penn USARC in Worcester Township. This section describes the existing socioeconomic conditions for Worcester Township and Montgomery County, which would provide the necessary goods and services to future occupants or users of the North Penn USARC property, including food, gasoline, and miscellaneous supplies. Socioeconomic factors include economic development, demographics, housing, quality of life, environmental justice, and protection of children. The economic ROI considered in this EA encompasses Worcester Township, Pennsylvania. Socioeconomic factors for the township were compared to those for Montgomery County and the state of Pennsylvania.

4.10.1.1 Economic Development

The U.S. Census Bureau (U.S. Census Bureau 2010a) reported that the civilian labor force within the state of Pennsylvania was 6,339,699, the total workforce within Montgomery County was 425,828, and Worcester Township's was 5,112 for 2009. Per capita income statistics from the 2005-2009 U.S. Census period indicate that the average per capita income of Montgomery County and Worcester Township were significantly higher than the state's per capita income. Per capita income statistics for each area are included in Table 4-4. The median household income of Worcester Township and Montgomery County were also significantly higher than that of the state (U.S. Census Bureau 2010a). Worcester Township's average annual unemployment was 2.4 percent, which was lower than both the county and state. Table 4-4 displays selected income characteristics for Worcester Township, Montgomery County, and Pennsylvania.

Table 4-4. Regional Income Statistics for 2005-2009.

Area	Workforce	Per Capita Income (\$)	Median Household Income (\$)	Unemployment Rate (%)
Pennsylvania	6,339,699	\$ 26,678	\$ 49,737	4.3
Montgomery County	425,828	\$ 39,511	\$ 75,728	3.3
Worcester Township	5,112	\$ 50,556.00	\$ 100,446.00	2.4

SOURCE: U.S. Census Bureau 2010a

The top three industry sectors within Pennsylvania are (1) educational services, and health care and social assistance (2) manufacturing; and (3) retail trade. The top three industry sectors in Worcester Township and Montgomery County include the following: (1) educational services, and health care and social assistance (2) manufacturing; and (3) professional, scientific, and management, and administrative and waste management services (U.S. Census Bureau 2010a). The top three occupations within Pennsylvania, Montgomery County, and Worcester Township are (1) management, professional, and related occupations; (2) sales and office occupations; and (3) service occupations. Table 4-5 displays selected employment statistics.

Table 4-5. Regional Employment Statistics for 2005-2009.

Area	Top Three Industries (%)	Top Three Occupations (%)
Pennsylvania	1 - Educational services, and health care and social assistance (24.3) 2- Manufacturing (13.2) 3 - Retail trade (11.7)	1 - Management, professional, and related occupations (34.8) 2 - Sales and office occupations (25.8) 3 - Service occupations (16.3)
Montgomery County	1 - Educational services, and health care and social assistance (24.0) 2 - Professional, scientific, and management, and administrative and waste management services (13.9) 3 - Manufacturing (12.8)	1 - Management, professional, and related occupations (47.0) 2 - Sales and office occupations (26.2) 3 - Service occupations (11.7)
Worcester Township	1 - Educational services, and health care and social assistance (20.0) 2 - Professional, scientific, and management, and administrative and waste management services (16.8) 3 - Manufacturing (14.5)	1 - Management, professional, and related occupations (48.7) 2 - Sales and office occupations (23.3) 3 - Service occupations (10.5)

SOURCE: U.S. Census Bureau 2010a

4.10.1.2 Demographics

Pennsylvania, Montgomery County, and Worcester Township all experienced an increase in population from 2000 to 2009. The township's population increase was significantly greater than the state and county (greater than 12 percent). Pennsylvania's overall increase was approximately 2 percent, while Montgomery County experienced growth of approximately 3.5 percent (U.S. Census Bureau 2010b).

According to the 2005-2009 U.S. Census estimates, Pennsylvania's percentage of individuals with a high school diploma was 86.9 percent (U.S. Census Bureau 2010a). Montgomery County had a higher percentage of high school graduates (92.2 percent). Worcester Township's percentage of high school graduates was higher than both areas (95.5 percent), and the percentage of individuals with Bachelor's Degrees was significantly higher (53.2 percent). Table 4-6 provides selected statistics for population trends and educational attainment for persons 25 years and older for 2005-2009.

Table 4-6. Regional Population and Education.

Area	2000 Population	2005-2009 Population	Population Trend 2000-2009 (%)	% High School Graduates	% Bachelor Degree or Higher
Pennsylvania	12,281,054	12,516,596	+ 1.9	86.9	26.0
Montgomery County	750,097	776,306	+ 3.5	92.2	43.7
Worcester Township	7,789	8,773	+12.6	95.5	53.2

SOURCES: U.S. Census Bureau 2010a, U.S. Census Bureau 2010b

4.10.1.3 Housing

Worcester Township and Montgomery County's housing occupancy rates were higher than state rates. Worcester Township's owner occupancy rates were significantly higher than the state and county. Housing statistics within the region reveal that the median home value was significantly higher in the township and Montgomery County than the state of Pennsylvania. Median rent in the ROI was also significantly higher than the state as a whole. Selected housing characteristics related to occupancy status, median house value, and median monthly rent are presented in Table 4-7.

Table 4-7. Regional Housing Characteristics for 2005-2009.

Area	Number of Housing Units	Occupied Houses (%)	Owner-Occupied (%)	Renter-Occupied (%)	Median Value	Median Contract Rent
Pennsylvania	5,481,676	89.3	71.5	28.5	\$ 152,300	\$ 716
Montgomery County	313,224	95.2	74.8	25.2	\$ 294,000	\$ 996
Worcester Township	3,452	95.7	85.0	15.0	\$ 424,400	\$1,475

SOURCE: U.S. Census Bureau 2010a

4.10.1.4 Public Services Schools

Worcester Township has approximately 5,400 students attending five elementary schools, one upper elementary school (grades 5 and 6), one intermediate school, and one high school (Methacton School District 2008).

Health

Four area medical facilities include Montgomery Hospital in Norristown, Phoenixville Hospital in Phoenixville, Lansdale Hospital in Lansdale, and Pottstown Memorial Medical Center in Pottstown (Worcester Township 2010b). Montgomery Hospital has 282 beds; Phoenixville Hospital has 153 beds; Lansdale Hospital has 125 beds; and Pottstown has 227 beds.

Law Enforcement

The Montgomery County Sheriff's Department is located in Norristown. Its primary duties are service of all writs, both criminal and civil, issued by the Courts; transportation of prisoners throughout the Commonwealth of Pennsylvania; and extraditions from other states for court proceedings. The Sheriff's Department has a bomb disposal unit, County Emergency Response Team, five Driving Under the Influence Processing Centers, and various community outreach programs. There are 129 staff members in the Montgomery County Sheriff's Department, including Deputy Sheriffs, administrative personnel, and clerical staff (Montgomery County 2010b).

Worcester Township's law enforcement services are provided by the Pennsylvania State Police (Worcester Township 2010b). In addition to law enforcement, the state police provide a variety of services from laboratory testing to specialized training.

Fire Protection

Worcester Township has an all-volunteer fire department that provides fire services within the township. They responded to an average of 211 calls each year between 2007 and 2010 (Worcester Township 2010b).

Montgomery County provides fire and emergency medical services to the county through its Department of Public Safety, which provides the education and training for the fire, rescue, and emergency medical services within the county. The Division of Emergency Medical Services maintains an emergency medical services system which is accessible on a uniform basis, to all residents and visitors of Montgomery County (Montgomery County 2010c).

Recreation

The ROI has a number of opportunities for recreation, including children and adult programs, softball, baseball, bocce ball, volleyball, and horseshoes for league play. Heebner Park is an 84-acre park with 2.25 miles of walking trails, a tot lot, outdoor basketball courts, tennis courts, soccer/multi-purpose fields, ball fields, picnic tables, and a gazebo (Worcester Township 2010c). A majority of households that frequent parks in the area use Heebner Park. Other popular parks include Zacharias Trail, Mount Kirk, and Sunny Brook Park.

4.10.1.5 Environmental Justice

Environmental justice is the fair treatment for people of all races, cultures, and incomes, regarding the development and implementation (or lack thereof) of environmental laws, regulations, and policies. EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, directs federal agencies to address environmental and human health conditions in minority and low-income communities. A memorandum from former President Clinton concerning EO 12898 stated that federal agencies would collect and analyze information concerning a project's impacts on minorities or low-income groups when required by NEPA. If such investigations find that minority or low-income groups experience a disproportionate adverse impact, then avoidance or mitigation measures are necessary. This section describes the distribution of minority and low-income populations for the North Penn USARC.

The initial step in the environmental justice analysis process is the identification of minority populations and low-income populations that might be affected by implementation of the proposed action or alternatives. For environmental justice considerations, these populations are defined as individuals or groups of individuals, which are subject to an actual or potential health, economic, or environmental threat arising from existing or proposed federal actions and policies. Low income, or the poverty threshold, is defined as the aggregate annual mean income for a family of four correlating to \$21,200 or for a family of three correlating to \$17,600 in 2008 (Department of Health and Human Services 2009).

As indicated in Table 4-8, according to the 2005-2009 U.S. Census, the percent of population within Worcester Township considered to be minority was significantly lower than the nation, state, and Montgomery County. Pennsylvania's minority population accounted for 16.2 percent of total population, while the minority population of Worcester Township was 9.5 percent and Montgomery County's was 15.7 percent. The national percentage of population considered

minority during the same time was 25.5 percent (U.S. Census Bureau 2010a). Residents identifying themselves as Black, African American, or Asian comprised a majority of the minority population in the state, county, and township.

Table 4-8. Regional Minority Population and Poverty Levels for 2005-2009.

Area	Minority Population (%)	% Individuals Below Poverty Level	% Below Poverty Level (Under Age 18)	% Below Poverty Level (Over Age 65)
Pennsylvania	16.2	12.1	16.8	9.0
Montgomery County	15.7	5.5	6.1	6.0
Worcester Township	9.5	1.8	0.0	4.6

SOURCE: U.S. Census Bureau 2010a

According to the U.S. Census Bureau (U.S. Census Bureau 2010a) estimates, 12.1 percent of individuals in the state of Pennsylvania were below poverty level compared to 5.5 percent in Montgomery County, and just 1.8 percent in Worcester Township. Poverty rates within Worcester Township for those under age 18 were significantly lower than the state and Montgomery County, while poverty rates for those over age 65 were also lower. Table 4-8 presents selected regional poverty statistics.

4.10.1.6 Protection of Children

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. These risks arise because children's bodily systems are not fully developed; because they eat, drink, and breathe more in proportion to their body weight; because their size and weight can diminish protection from standard safety features; and because their behavior patterns can make them more susceptible to accidents. Based on these factors, President Clinton directed each federal agency to make it a high priority to identify and assess environmental health risks and safety risks that might disproportionately affect children. President Clinton also directed each federal agency to ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or 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.

4.10.2 CONSEQUENCES

Potential socioeconomic impacts are considered significant if the Proposed Action would cause:

- Substantial gains or losses in population and/or employment; or

- Disequilibrium in the housing market, such as severe housing shortages or surpluses, resulting in substantial property value changes.

Potential environmental justice impacts are considered significant if the Proposed Action would cause disproportionate effects on low-income and/or minority populations. Potential impacts to protection of children are considered significant if the Proposed Action would cause disproportionate effects on children.

4.10.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, potential socioeconomic impacts from closure, demolition, construction, and reuse would not be significant. Changes to the existing socioeconomic baseline conditions in the ROI would be negligible as a result of closure of the facility. The existing three full-time personnel and reservists assigned to the North Penn USARC would be transferred to Willow Grove Joint Reserve Base, Pennsylvania, which is approximately 15 miles from the North Penn USARC, and within Montgomery County.

Potential short-term economic benefits would be realized as a result of demolition and activity for the proposed reuse. These impacts would be in the form of additional employment, income, and business sales created. Negligible impacts to housing, education facilities, law enforcement, and fire protection under this reuse scenario are also anticipated. Development of the new park and open space would be a beneficial impact to recreation in the local area. Additional positive impacts of development include use of the facilities by area residents and community groups. No adverse potential impacts to minority or low-income populations have been identified as a result of the proposed closure, demolition, construction, and reuse activities.

Reuse of the area for recreation would result in increased access to the property by children. Reuse could pose a potential adverse impact to child health and safety should they gain access to that portion of the property containing the OMS pad, the vehicle storage area, and the underground missile silos. The 99th RSC will take reasonable precautions to secure the portion of the property containing the OMS pad, the vehicle storage area, and the underground missile silos prior to transfer. Mitigation would include fencing and locking the area to prevent unauthorized access. In addition, barriers to the entrances of the silos and other underground facilities would be secured by locks and welds to prevent unauthorized entry.

Further, Worcester Township would mitigate the long-term potential health and safety impacts to children by keeping that portion of the property containing the Nike underground missile silos and other underground facilities fenced and locked, maintaining the barriers that deny access to underground facilities, and taking appropriate measures to prevent unauthorized access to this area and the silos. Worcester Township will not allow public access to this area in the future without first implementing appropriate safety measures.

4.10.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, there would be no short- or long-term benefits. Changes to the existing socioeconomic baseline conditions would be negligible as a result of operational closure with periodic maintenance and upkeep of the facility. Worcester Township would not experience any substantial gains or losses in population, unemployment, or housing.

4.10.2.3 No Action Alternative

Under the No Action Alternative, there would be no changes to the existing socioeconomic baseline conditions.

4.11 Transportation

4.11.1 AFFECTED ENVIRONMENT

This section describes the existing transportation conditions at and surrounding the North Penn USARC. Roadways and traffic are discussed first, followed by site and public transportation.

4.11.1.1 Roadways and Traffic

The North Penn USARC is located in Montgomery County, Pennsylvania, in the Township of Worcester. The facility is on the north side of Berks Road, and is located approximately 2.5 miles northwest of the intersection of U.S. Route 202 and Interstate 476.

Montgomery County experiences a large amount of vehicle traffic and has 39.2 miles of federal and 157 miles of state highway to support that traffic (PennDOT 2008). The major highways located within the area include State Highways 363 and 73. Travel to the North Penn USARC from anywhere within Montgomery County is possible via the extensive network of highways and surface roads.

4.11.1.2 Site Transportation

The 19-acre North Penn USARC site is accessed via Berks Road. No major streets occur within the facility's boundary. However, the site includes paved parking areas for military equipment and privately-owned vehicles. Approximately 52 percent of the site is covered by impervious surfaces such as parking areas and building footprints.

4.11.1.3 Public Transportation

Worcester Township is not served by public transportation.

4.11.2 CONSEQUENCES

Potential impacts to transportation are evaluated with respect to the potential for the Proposed Action to:

- Disrupt or improve current transportation patterns and systems;
- Deteriorate or improve existing levels of service; and
- Change existing levels of safety.

4.11.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, impacts to transportation from closure, demolition, construction, and reuse would not be significant. Closing the site would eliminate the daily vehicle traffic from the three full-time workers and also eliminate the weekend vehicle traffic from up to 68 reservists attending a drill weekend.

Construction and demolition activities would be temporary and would occur only within the site's boundary. However, if a wing of the administration building is demolished, an increase in vehicular traffic on the local streets would occur due to truck and heavy equipment traffic and from the private vehicle traffic of the demolition workers. This impact would be temporary, and should not disrupt existing transportation patterns or systems. No changes to Berks Road or the entrance of the facility are planned. An increase in heavy equipment on the local roadways and at the site during the construction and demolition phases may cause minor, short-term traffic safety issues. These issues could include temporary lane closures within the vicinity of the property and oversized vehicles on roadways.

Based on the reuse plan, traffic to the area is expected to increase once the park has been completed, causing a minor adverse impact. Reuse of the property would cause daily variations in traffic activity, based on the time of year and community theater rehearsal and event schedules. No park visitor numbers are available yet, but it is expected to be well used by the 8,000- to 9,000-person community. Currently, there are three full-time employees on site. A total of 139 reservists are assigned to the facility, with three drill weekends per month. The largest drill weekend is 68 reservists, and an average drill weekend is 46 reservists.

An increased accessibility to the park and surrounding areas via alternate forms of transportation is also anticipated. The reuse plan calls for the creation of pedestrian walkways, bike paths and horse trails within the park area, with the intent of connecting these new trails with existing ones in the surrounding area. This expansion of the community's network of trails and paths is expected to increase access to the park and surrounding areas, and is considered a beneficial impact for the community.

4.11.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, the vehicle traffic would be reduced from the existing conditions. The daily vehicle traffic from the current three full-time workers and the weekend vehicle traffic would be eliminated. The number of maintenance workers, and thus the amount of vehicle traffic, would be less than existing conditions. This would create a minor positive impact with regard to traffic safety in and around the site. The current transportation patterns and systems would be slightly benefited under this alternative, due to less traffic on the roadways.

4.11.2.3 No Action Alternative

Under the No Action Alternative, the Army would continue to use the North Penn USARC under the existing baseline conditions. No changes or impacts would occur to transportation.

4.12 Utilities

4.12.1 AFFECTED ENVIRONMENT

This section describes existing utilities at the North Penn USARC. In general, the utility systems are classified as distribution and collection systems including water, sanitary sewer, storm drainage, electrical, natural gas, and industrial wastewater. Communication systems and solid waste disposal are also discussed in this section.

4.12.1.1 Potable Water Supply

Potable water can be defined as water fit for drinking, being free from contamination, and not containing a sufficient quantity of saline material to be regarded as a mineral water. A water supply well located on the North Penn USARC provides potable water. The water supply well is located in the center of the privately-owned vehicle parking lot, within a 54-square foot pump house. The water supply well is approximately 235 feet deep and contains a 5 gallons per minute electric submersible pump which fills a 2,000 gallon hydropneumatic supply tank. Two booster pumps provide potable water at 80 gallons per minute to the North Penn USARC potable water supply system.

Concentrations of VOCs in groundwater were detected above safe drinking water standards in the North Penn USARC potable water supply well in 1993 and 1994. Subsequent analysis in 1996 and 1997 found VOC concentrations were in compliance with safe drinking water standards, likely a result of cleanup efforts at the Transicoil/North Penn – Area 12 site (USACE Louisville 2007). Although lead and copper were detected in the 1996 and 1997 groundwater samples, their concentrations were below PADEP drinking water and Act 2 standards (USACE Louisville 2007). Chapter 109 of the Pennsylvania Code provides for the protection of the public health and safety by assuring that public water systems provide a safe and adequate supply of water for human consumption by establishing drinking water quality standards, permit requirements, design and construction standards, system management responsibilities and requirements for public notification (Pennsylvania Code 2010). Section 4.13 contains additional information on groundwater contamination at the property. Section 4.7 discusses groundwater resources.

4.12.1.2 Wastewater System

Wastewater collection and treatment at the property is accomplished through a local collection system, pump station, and sand-mounded septic system. The sand-mounded septic system replaced the previous sewage treatment plant in the same northeastern portion of the property. Sewage collects at a pump station on the southwest side of the privately-owned vehicle parking lot and is pumped to the sand-mounded septic system (USACE Louisville 2007).

4.12.1.3 Energy Sources

Electric and natural gas services for the property are provided by the PECO (USACE Louisville 2007). PECO serves 1.6 million electric and 491,000 natural gas customers in southeastern Pennsylvania, and operates 550 electric substations, 21,000 miles of distribution and transmission lines, 27 natural gas gate stations, and 6,600 miles of underground gas mains. PECO is helping customers use energy more efficiently by offering energy saving products at savings up to 20 percent. PECO is also an Energy Star partner and provides discounts on natural gas heaters and water heaters. Furthermore, wind-generated electricity is available to customers through PECO WIND, named one of the Department of Energy's top ten green power programs in 2008. These efforts are a component of Exelon 2020: A Low-Carbon Roadmap, the comprehensive environmental plan of PECO's parent company. Exelon 2020 sets the goal of reducing, offsetting or displacing more than 15 million metric tons of greenhouse gas emissions per year by 2020. The corporation will do this by reducing or offsetting the company's carbon

footprint, helping customers reduce their greenhouse gas emissions, and providing more low-carbon electricity in the marketplace (PECO 2010a).

4.12.1.4 Communication

Telecommunication services for the property are offered by Verizon (formerly Bell Atlantic-Pennsylvania, Inc.), Conestoga Telephone & Telegraph Company, and AT&T (MCEDC 2010).

4.12.1.5 Solid Waste

Solid waste collection services for the property are offered by several private haulers (YellowUSA 2010).

4.12.2 CONSEQUENCES

Effects on infrastructure are considered in terms of increases in demands on systems and the ability of existing systems to meet those demands. Potential effects to the environment could occur if the existing systems are insufficient to handle the increased demands requiring construction and operation of a new system. Utility demands include both construction and operations usage. Individual segments that comprise the totality of the infrastructure are discussed below.

Potential impacts to the potable water system are considered significant if the Proposed Action would:

- Reduce potable water availability;
- Disrupt potable water distribution systems;
- Change water demands that affect regional potable supplies; or
- Generate contaminants that cause negative effects on water quality.

Potential impacts to the electrical systems are considered significant if the Proposed Action would:

- Change regional electricity demands requiring major new components such as transmission lines, transformers, and substations; or
- Cause long-term disruptions in available electrical services.

Potential impacts to liquid fuel systems are considered significant if the Proposed Action would:

- Cause unsafe, inadequate, or noncompliant temporary or long-term storage or distribution systems; or
- Cause unreliable distribution of liquid fuels that cannot meet the mission and support requirements.

Potential impacts to solid waste are considered significant if the Proposed Action would increase solid waste such that it overwhelms local landfills.

4.12.2.1 Preferred Alternative: Traditional Disposal and Reuse

Overall, impacts to utilities from closure, demolition, construction, and reuse would not be significant. One wing of the administration building may be demolished. Demolition could temporarily impact solid waste resources by temporarily increasing the volume of demolition debris requiring landfilling. The LRA's proposed reuse involves minimal construction and therefore, no impacts to utilities associated with construction are expected.

Reuse of the property would result in continued use of the potable water supply, wastewater system, energy sources, communication services, and solid waste system at levels similar to those currently experienced. Concentrations of VOCs in groundwater were detected above safe drinking water standards in the North Penn USARC potable water supply well in 1993 and 1994. Subsequent analysis in 1996 and 1997 found VOCs concentrations were in compliance with safe drinking water standards, likely a result of cleanup efforts at the Transicoil/North Penn – Area 12 site (USACE Louisville 2007). Although lead and copper were detected in the 1996 and 1997 groundwater samples, their concentrations were below PADEP drinking water and Act 2 standards (USACE Louisville 2007). Chapter 109 of the Pennsylvania Code provides for the protection of the public health and safety by assuring that public water systems provide a safe and adequate supply of water for human consumption by establishing drinking water quality standards, permit requirements, design and construction standards, system management responsibilities and requirements for public notification (Pennsylvania Code 2010).

4.12.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, impacts to utilities systems would be beneficial in that there would be a significant reduction or elimination of demand for all of the utility resources.

4.12.2.3 No Action Alternative

Under the No Action Alternative, there would be no change to utility resources as operations would continue at present activity levels.

4.13 Hazardous and Toxic Substances

4.13.1 AFFECTED ENVIRONMENT

This section describes the existing conditions of hazardous and toxic substances at the North Penn USARC.

4.13.1.1 Hazardous Materials

For purposes of this EA, hazardous materials are those regulated under federal, state, DoD, and Army regulations. Hazardous materials are required to be handled, managed, treated, or stored properly by trained personnel under the following regulations: Occupational Safety and Health Administration Hazardous Communication, 29 CFR 1900.1200 and 29 CFR 1926.59; and Department of Transportation Hazardous Materials, 49 CFR 172.101; EPA, 40 CFR 260 et seq. (OSHA 2010). Hazardous materials used and stored at the North Penn USARC are associated with facility maintenance, vehicle maintenance, janitorial activities, and historic Nike Ajax missile operations. Vehicle maintenance chemicals (vehicle maintenance products, petroleum products, oils, and lubricants) found in the OMS building are stored both in open areas and in

flammable materials storage cabinets. Janitorial chemicals (cleaning products) are stored in the Administration Building janitorial closet's designated storage area. Storage of chemicals associated with historic Nike Ajax missile operations varies considerably (USACE Louisville 2007).

4.13.1.2 Hazardous Waste Disposal

In 2005, the PADEP concluded that North Penn USARC was no longer classified as a transporter of hazardous waste or a Resource Conservation and Recovery Act (RCRA) small quantity generator, but more appropriately a RCRA conditionally exempt small quantity generator. In addition, 99th RSC personnel stated that hazardous wastes are no longer generated at the North Penn USARC (USACE Louisville 2007).

4.13.1.3 Environmental Condition of Property

An Environmental Condition of Property Report (USACE Louisville 2007) was completed along with a Sampling Work Plan Phase II Environmental Condition of Property (USACE Baltimore 2009). The purpose of these reports was to obtain a baseline of the environmental condition of the property and provide recommendations for future studies. Results of the findings are summarized below. A Phase II Environmental Condition of Property report is in progress. The draft final report is provided in Appendix F.

Groundwater. The North Penn USARC is located downgradient of the Transicoil/North Penn – Area 12 Superfund site (USEPA ID# PAD057152365). Concentrations of VOCs in groundwater were detected above safe drinking water standards in the North Penn USARC potable water supply well in 1993 and 1994. Subsequent analysis in 1996 and 1997 found VOC concentrations were in compliance with safe drinking water standards, likely a result of cleanup efforts at the Transicoil/North Penn – Area 12 site (USACE Louisville 2007). Historic groundwater samples collected from the water supply well in 1993 and 1994 were found to contain VOCs and metals in exceedance of PADEP drinking water and Act 2 standards. PADEP's Act 2, Land Recycling Program, encourages the recycling and redevelopment of old industrial sites. It sets standards that are protective of human health and the environment, but also considers future use. VOCs were not detected in subsequent groundwater samples from the water supply well collected in 1996 and 1997. Although lead and copper were detected in the 1996 and 1997 groundwater samples, their concentrations were below PADEP drinking water and Act 2 standards (USACE Louisville 2007). Drinking water test results from the January 2010 sampling event revealed that total coliform was not detected in the sample (Cedar Grove Environmental, Inc. 2010). Soil samples collected as part of the Phase II Environmental Condition of Property report did not contain target constituent concentrations in excess of their respective PADEP Act 2 standards (Appendix F).

Spoils area. A former spoils area is located southeast of the former sewage treatment plant, likely associated with sewage plant upgrades. The nature of these spoils is uncertain, as no historical documents indicate their nature or their removal. This area was sampled in 2001; no exceedances of PADEP Act 2 regulatory standards were reported. The PADEP and 99th RSC did a further review of this area, including a site visit in July 2009, and negotiations resulted in removal of this area as a concern (USACE Baltimore 2009).

USTs. A former 1,000-gallon gasoline UST is listed on the PADEP Tank Incident List in “inactive” status, indicating the PADEP does not consider the UST as being closed. Soil samples were collected from this area per PADEP guidance during an investigation in July 2010. Lead was the only analyte detected and was found at concentrations ranging from 11.3 milligrams per kilogram (mg/kg) to 24.3 mg/kg (Bhate Associates 2010). These concentrations are well below statewide health-based standards. The PADEP Act 2 Medium Specific Concentration is 190,000 mg/kg for direct contact with subsurface soils in nonresidential areas and the minimum threshold standard is 450 mg/kg for transfer of lead from soil to groundwater.

A former 20,000-gallon heating oil UST was removed due to a leak. This UST is listed on the PADEP Tank Incident List in “inactive” status, indicating the PADEP does not consider the UST as being closed (USACE Louisville 2007). Soil samples were collected from this area per PADEP guidance during an investigation in July 2010. Based on the laboratory analytical reports, no chemicals of concern were detected in the soil samples (Bhate Associates 2010).

Soil samples were also collected at a former 5,000-gallon diesel UST in July 2010. Based on the laboratory analytical reports, no chemicals of concern were detected in the soil samples (Bhate Associates 2010).

Above-ground storage tank. An historical spill of heating oil is associated with the aboveground storage tank next to the potable water supply well. The PADEP and 99th RSC did a further review of this area, including a site visit in July 2009, and negotiations resulted in removal of this area as a concern (USACE Baltimore 2009).

Soil contamination. A soil excavation was completed to remove an oil-like substance identified in the drainage ditch southeast of the Administration Building. The same oil-like substance was subsequently observed in the storm sewer outfall and ditch following cleanup activities (USACE Louisville 2007). Soil samples were collected from this area per PADEP guidance during an investigation in July 2010. Based on the laboratory analytical reports, semi-volatile organic compounds were detected in the composite surface soil sample at concentrations below their respective PADEP Act 2 Medium Specific Concentrations. Total petroleum hydrocarbon was detected at a concentration of 1,340 mg/kg. There is not a PADEP Act 2 Medium Specific Concentration for total petroleum hydrocarbon (Bhate Associates 2010). However, the State of Pennsylvania has determined that if no surface soil Medium Specific Concentrations for individual chemicals were exceeded, no health-based standards have been exceeded.

PADEP identified a former Fire Training Area Burn Area in its June 2007 letter to the 99th RSC. As part of an investigation during January 2010, soil samples were collected from this area per PADEP guidance (USACE Baltimore 2009). As part of the investigation in July 2010, soil samples were collected from this area per PADEP guidance. Based on the laboratory analytical reports, semi-volatile organic compounds were detected in subsurface soil samples at concentrations below their respective PADEP Act 2 Medium Specific Concentrations. Volatile organic compounds and total petroleum hydrocarbon were not detected in the soil samples (Bhate Associates 2010) and are therefore below the minimum threshold for Pennsylvania health-based standards.

PADEP also identified an OMS Service Pit Closure in its June 2007 letter. The PADEP and 99th RSC did a further review of this area, including a site visit in July 2009, and negotiations resulted in removal of this area as a concern (USACE Baltimore 2009).

Asbestos. A November 2004 investigation identified friable and nonfriable asbestos-containing material (ACM) in the buildings at the North Penn USARC. The main USARC building contains known or suspected ACM. Nonfriable asbestos was found in the off-white and white-speckled 12-inch by 12-inch floor tile and black mastic material in the main building. Friable asbestos was found in an off-white divider wall in Room 109 and similar divider walls were noted in six other rooms, although none were sampled. Thirteen sets of single and double fire doors located throughout the building were not sampled, but are assumed to have ACM based on the manufacturer and date of the building. In addition, the roof of the administration building was not sampled and could contain asbestos (USACE Louisville 2007).

Polychlorinated biphenyls. Results of a 2003 investigation determined that a pad-mounted transformer located on the southwest side of the Administration Building and one pole-mounted transformer located between the OMS building and sand-mounded treatment system contain polychlorinated biphenyls. A site reconnaissance completed in 2006 confirmed the pad-mounted transformer was labeled as containing polychlorinated biphenyls (USACE Louisville 2007).

Lead-based paint. LBP or lead-containing paint has been identified in North Penn USARC buildings as a result of a 2004 inspection. LBP and lead-containing paint was primarily found on walls, doors, doorframes, windowsills, window frames, ceilings, and radiators in both the Administration Building and OMS building (USACE Louisville 2007). The Army has no further plans to test for LBP. Any further testing would be conducted by the LRA prior to any demolition.

Nike Ajax missile silos. Potential contamination associated with historic Nike Ajax missile operations including use of chlorinated solvents and acids have only been minimally investigated. A limited site investigation performed in 2001 recommended a groundwater investigation. The PADEP and 99th RSC did a further review of this area, including a site visit in July 2009, and negotiations resulted in removal of this area as a concern (USACE Baltimore 2009).

4.13.2 CONSEQUENCES

Potential impacts to hazardous materials management are considered significant if the Proposed Action would:

- Result in noncompliance with applicable federal and state regulations; or
- Increase the amounts of generated or procured hazardous materials beyond current permitted capacities or management capabilities.

4.13.2.1 Preferred Alternative: Traditional Disposal and Reuse

Closure of the North Penn USARC would not relieve the Army of its responsibility to investigate and clean up potential soil and or groundwater contamination resulting from previous Army activities. The North Penn USARC potable water supply well complies with federal and state

drinking water standards. Demolition of the classrooms wing of the Administration Building as considered by the LRA would have no additional impact to hazardous materials management beyond that associated with closure of the North Penn USARC. Prior to any demolition, Worcester Township would be responsible for abatement of asbestos and LBP by trained and certified personnel. Removal and disposal would be in accordance with applicable federal and PADEP regulations and no significant impacts are expected.

Implementation of the LRA's proposed reuse involves minimal construction. Therefore, there would be no impact to hazardous materials or hazardous wastes management associated with construction activities. Because the concentrations of all chemicals detected in the soils during the soil investigation in July 2010 were below the health-based standards established for nonresidential soils, no adverse health impacts would be expected from exposure to surface or subsurface soil during demolition or construction activities.

Reuse of the North Penn USARC facilities following the LRA reuse plan would have a beneficial impact to hazardous materials and hazardous wastes management. Reuse of the facilities would necessarily require closure of the facility and result in reduced demand for both hazardous materials and hazardous wastes management compared to those used by existing facility maintenance, vehicle maintenance, or janitorial activities.

4.13.2.2 Caretaker Status Alternative

Implementation of the Caretaker Status Alternative would result in beneficial impacts to hazardous materials and hazardous wastes management similar to that associated with closure as discussed under the Preferred Alternative.

4.13.2.3 No Action Alternative

Under the No Action Alternative, there would be no change to hazardous materials or hazardous wastes management as operations would continue at present activity levels.

4.14 Cumulative Effects

Cumulative effects are those environmental impacts that result from the incremental effects of other past, present, or reasonably foreseeable future actions when combined with the Proposed Action. CEQ regulations stipulate that the cumulative effects analysis within an EA consider the potential environmental impacts resulting from the "incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such actions" (40 CFR 1508.7). Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (federal, state, and local) or individuals.

The scope of the cumulative effect analysis involves evaluating impacts to environmental resources by geographic extent of the effects and the time frame in which the effects are expected to occur. Past, present, and reasonably foreseeable actions are identified first, followed by the cumulative effects that could result from these actions when combined with the Proposed Action.

4.14.1 PAST, PRESENT, AND REASONABLY FORESEEABLE ACTIONS

The geographic area analyzed for cumulative effects of past, present, and future actions includes Montgomery County and Worcester Township, where reuse impacts would be the greatest. Pennsylvania is a state rich in history and culture. Worcester Township, formed in 1733, was settled by diverse immigrants of Dutch, English, German, and Welsh descent, where farming played a central role to the area's economy. Wheat, dairy, poultry and potatoes, as well as flax seed oil were common agriculture commodities. With the development of two large pike roads, the Skippack Pike and Germantown Pike, early in the township's history, Worcester Township became known for its farming trade with Philadelphia (Worcester Historical Society 2010). Worcester Township and Montgomery County were also known for reshaping portions of history including the revolutionary war involvement with George Washington's army at Valley Forge, and establishments involved in the Underground Railroad.

Montgomery County still retains its rural and farming characteristics, which is not likely to dramatically change in the future, with the movement towards permanently preserved farms. Several Montgomery County agriculture programs exist that allow farmers to place an easement on property to prevent future commercial, residential or industrial development of the land (Montgomery County 2010a). By 2010, the Montgomery County Farmland Preserve Program had established 126 farms, for a total of 7,902 acres to remain in perpetuity in the area.

The main changes and improvements to the county include several transportation improvement projects in the last couple of years. The widening of I-276 highway from Norristown to Valley Forge increased the number of lanes to six through the area as well as replaced the Norristown interchange with the state-of-the-art toll booth station (Montgomery County 2008). In 2008, the Interstate 476 widening project from Plymouth Meeting to Lansdale began (Montgomery County 2008). Reconstruction of the bridges at U.S. Highway 202 and Walton Road began in February 2009 and were completed in October 2010. Widening of the southern 6 miles of Interstate 476, from the Mid-County interchange to the Lansdale interchange, is scheduled to begin in spring 2011. The northern section of the rebuilding project from the Lansdale interchange to Berks Road is scheduled for construction in 2014 (Philly.com 2010).

Present and future actions near the Proposed Action site are assumed to relate to increased development and the conversion or reduction in farmland. The area immediately surrounding the Proposed Action site is zoned agriculture and residential, and no future projects are planned in the immediate area. However, two construction projects are proposed within 5 miles of the Proposed Action site: the PECO substation and the Einstein Hospital. The construction of a new substation that will transfer 500 kilovolts of power to another line at 230 kilovolts is planned for Central Point about 2 miles from the Proposed Action (PECO 2010b). The substation would develop an additional 10 acres of land in the area. Four miles from the Proposed Action site, north of Route 202, is the site of the new Albert Einstein Healthcare Network, a 100-150 bed hospital (Philadelphia Bizjournal 2008) to serve the communities of central Montgomery County. The 450,000-square-foot facility will be located on what is now an 85-acre golf course in East Norriton. Final approval by the East Norriton Township for the project has occurred and ground breaking for the new hospital occurred in September 2010. Development of the hospital is only expected on one-third of the property with two-thirds of the acreage to remain as undeveloped and open space (Bortnichak 2010).

4.14.2 CUMULATIVE EFFECTS SUMMARY

Environmental effects for all resources potentially affected by the Proposed Action and alternatives when combined with the past, present, and reasonably foreseeable projects in the area would not be significant.

4.14.2.1 Preferred Alternative – Traditional Disposal and Reuse

The conversion of land resources from use as an Army Reserve training center to a public park and recreational center would not cause an adverse impact to land use because it is compatible with the overall residential and agricultural character of the area. The Proposed Action would cause incremental beneficial impacts to aesthetics and visual resources (as seen from the immediately surrounding area) as new trails and recreational areas are developed and potentially new vegetation is added. New construction in the area, especially the Einstein Hospital, would cause some visual and aesthetic impacts to the area as a portion of the golf course is converted into the hospital, but the impacts would not be significant since only one-third of the property is expected to be developed and trees for a visual buffer will be used around the hospital to minimize impacts (Bortnichak 2010). The PECO substation would also add to the visual impacts in the area from large towers and additional transmission lines. The Preferred Alternative would not cause cumulative impacts to visual resources when combined with the PECO and Einstein Hospital projects due to the distance between the projects and the visual buffers used to reduce impacts.

Cumulative impacts of the Proposed Action, when combined with past, current, and future actions in the area, would not substantially enhance or diminish the quantity or quality of habitat for plants and animals, nor would they substantially enhance or diminish regional or local populations of federal- or state-listed plant or animal species. Although the construction of the hospital will alter approximately 28 acres of potential wildlife habitat, the conversion of the North Penn USARC to parkland and the remaining proposed hospital area being open space acreage, as well as the preservation of surrounding farms, would maintain areas for wildlife usage. Therefore, resulting cumulative impacts to biological resources would not be significant.

Noise associated with construction would not add significantly to other sources of noise, and specifically would not result in significant cumulative impacts in combination with the projects due to the distance between the projects and the rural setting separating them. In addition, cumulative impacts on groundwater recharge would not be significant with the proposed reuse and construction projects since the amount of impervious surfaces at the proposed site is not expected to increase, and the hospital will occupy the area currently composed of impervious surfaces at the golf course to maintain the same parking lot. Construction projects may temporarily disturb surface water infiltration, but with no surface waters or floodplains located on the North Penn site, and the distance between construction projects, cumulative impacts to surface waters and floodplains are not expected. With little construction expected at the proposed site, the effects on geology and soils, air quality, and waste are not likely to be cumulative with the other projects proposed in the area due to the distance between the projects. Cumulative impacts to utilities are also not likely due to the distance between the projects and the reduced demand on utilities at the North Penn USARC.

Traffic from the proposed project is likely to increase as the site becomes more developed as a recreation site. This increase in traffic, in addition to other development projects, such as the new hospital, could cause cumulative effects on traffic flow through the area. However, the improved highway systems will reduce the traffic impacts and reduce their cumulative effect. Cumulative impacts to transportation would not be significant.

Although the area near the North Penn USARC contains a few historical sites, cumulative impacts to cultural resources from the proposed project would not be significant since the proposed project would be completed mostly on areas already developed that contain no historical sites or cultural resources. Positive impacts to the cultural resources may be realized as people visit the area for the recreational opportunities and are exposed to the historical culture of the area. In addition, although the closure of the North Penn USARC would reduce the number of reservists using the area, the site may actually see an increase in usage that provides positive benefits for the township. Cumulative impacts for socioeconomics when considered with the other projects in the area are likely to be beneficial.

4.14.2.2 Caretaker Status Alternative

Under the Caretaker Status Alternative, it is anticipated that past and present development trends in the surrounding civilian community would continue and activity at the North Penn USARC would be drastically reduced as the mission was relocated and the site subjected to caretaker status. No cumulative impacts would occur under this alternative.

4.14.2.3 No Action Alternative

Under the No Action Alternative, no impacts or changes to the existing conditions at the North Penn USARC would occur. Therefore, no cumulative impacts would occur from past, present, or reasonably foreseeable actions.

4.15 Mitigation Summary

Mitigation measures are actions required for the specific purpose of reducing the significant environmental impacts of implementing a proposed or alternative action. An EA may specify mitigation measures that, if implemented, would prevent significant impacts that would otherwise require an environmental impact statement.

The 99th RSC will take reasonable precautions to secure the portion of the property containing the OMS pad, the vehicle storage area, and the underground missile silos prior to transfer. Mitigation would include fencing and locking the area to prevent unauthorized access. In addition, barriers to the entrances of the silos and other underground facilities would be secured by locks and welds to prevent unauthorized entry.

Further, Worcester Township would mitigate the long-term potential health and safety impacts to children by keeping that portion of the property containing the Nike underground missile silos and other underground facilities fenced and locked, maintaining the barriers that deny access to underground facilities, and taking appropriate measures to prevent unauthorized access to this area and the silos. Worcester Township will not allow public access to this area in the future without first implementing appropriate safety measures.

5.0 FINDINGS AND CONCLUSIONS

The purpose of the Proposed Action is to implement the Army's proposal to close the North Penn USARC as directed by BRAC. Disposal and property reuse by the LRA for local reuse and development is the Army's Preferred Alternative. Direct, indirect, and cumulative impacts of the Preferred Alternative, the Caretaker Status Alternative, and the No Action Alternative have been considered. The evaluation performed within this EA concludes that there would be *no significant adverse impact* to the local environment or quality of life as a result of the implementation of the Preferred Alternative provided that best management practices and mitigation measures specified in this EA are implemented. Long-term beneficial impacts to aesthetics, biological resources, and recreation would occur from development of the proposed parkland. Therefore, the issuance of a FNSI is warranted, and preparation of an environmental impact statement is not required.

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APPENDIX A. RECOMMENDED REUSE PLAN

This appendix contains the Local Redevelopment Authority's recommended reuse plan for the North Penn Memorial United States Army Reserve Center.

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN USARC LRA
CONCERNING THE REUSE OF THE NORTH PENN USARC
WORCESTER TOWNSHIP, PA**



LRA MEMBERS: John R. Harris
Chase E. Kneeland
Arthur C. Bustard

FINAL REPORT AND RECOMMENDATION OF THE NORTH PENN USARC LRA

A. SURPLUS PROPERTY DECLARATION AND FORMATION OF LRA

During the spring of 2006, the Board of Supervisors of Worcester Township was informed that the North Penn U.S. Memorial Army Reserve Center, located in Worcester Township, had been declared surplus property and was to be disposed of by the Army in accordance with applicable federal law.¹

At a public meeting held on April 19, 2006, the Board of Supervisors passed Resolution No. 06-07,² establishing the North Penn USARC Redevelopment Authority for the purpose of formulating a recommendation for the reuse of the site. The LRA's duties included supplying information about the property to interested parties and the public; receiving public input; holding public hearings; and making a final recommendation concerning the reuse of the property.

Pursuant to this resolution, the following residents of Worcester Township were appointed to the LRA: John Harris, Chase Kneeland, and Arthur Bustard. All three LRA members are elected members of the Worcester Township Board of Supervisors.

A certified copy of Resolution No. 06-07 was submitted to the Office of the Secretary of Defense, and that office was asked to recognize the North Penn USARC LRA as the official body responsible for preparing the necessary land use plan and recommendation. Subsequently, the Office of Economic Adjustment, Office of the Secretary of Defense, designated the North Penn USARC LRA as the recognized agency for reuse planning.³

The political jurisdiction comprising the LRA is Worcester Township, a municipal body organized and operating as a Township of the Second Class under the laws of the Commonwealth of Pennsylvania.

The LRA established a planning time frame and, as part of the time frame, established a six-month screening period for interested public benefit organizations to file a Notice of Interest (NOI) to reuse the property. This screening period extended from June 9, 2006, to December 8, 2006.

In May 2006, the LRA members attended an informational meeting with Liz Gabor, Project Manager with the Office of the Secretary of Defense, Office of Economic Adjustment. Ms. Gabor reviewed with the LRA the procedure and requirements for screening for this property.

B. PUBLIC WORKSHOP AND SITE TOUR

As part of the public planning process, the LRA held a public workshop on June 29, 2006, to provide public benefit organizations with the opportunity to become familiar with the property, and to answer any questions about the NOI process. This workshop was advertised in the local newspaper, *The Times Herald*.⁴ The notice of this workshop was also sent to the following public agencies and organizations, including those that provide, or propose to provide, homeless and supportive housing and services in the area:

¹ The notice of surplus property is included in Appendix I.

² Resolution No. 06-07 is included in Appendix I.

³ The Federal Register notice of recognition of the North Penn LRA is included in Appendix I.

⁴ A copy of the local newspaper notice is included in Appendix II.

- Montgomery County Housing Coalition (POC for the Homeless Continuum of Care in Montgomery County)
- Worcester Volunteer Fire Department
- Montgomery County Board of Commissioners
- Methacton School District

Representatives of several of these organizations attended the public workshop.⁵ The LRA assembled a packet of informational material on the property and the NOI process. This packet was distributed to all participants at the June 29 workshop and was also available to the general public.⁶ This packet has been distributed to any individual or organization requesting a copy.

As an additional part of the planning process, the LRA held a public tour of the facility on September 27, 2006. This site tour was advertised in the local newspaper in the legal notices section and the front section.⁷ The information packet that was distributed at the public workshop on June 29 was also made available at the public site tour on September 27. Representatives of several public benefit organizations attended the site tour, along with township residents and officials.⁸

C. HOMELESS ASSISTANCE SUBMISSION

1. Information about Homelessness

Outreach efforts by the LRA resulted in no homeless provider interest in the property. The Montgomery County Housing Coalition is the homeless Continuum of Care point of contact for Montgomery County. This organization brings together a diverse group of people from community-based organizations, local government leadership, businesses, human services organizations, government agencies, financial institutions, builders, and faith-based organizations.

The Housing Coalition is a model of private and public sector partnership, with the common goal of reducing barriers to affordable housing, which is one of the most pressing needs of the homeless in Montgomery County. The Coalition members work to identify different populations of individuals who make up the homeless as well as the supportive services they need. Monthly Coalition meetings facilitate communication and nurture partnerships, cooperation, and joint ventures.

Periodic assessments of the needs of the homeless population performed by the Continuum of Care for Montgomery County have provided data to identify the needs of this population. In January 2005, the Montgomery County Housing Coalition's Homeless Continuum of Care Committee on Shelter and Transitional Housing, in cooperation with the County Homeless Action Team, conducted a one-day point-in-time count of the homeless population in Montgomery County. The survey counted homeless persons when they received or requested shelter during a 24-hour period. Twenty-one agencies and shelters participated in this count. In addition, a one-night street count was performed in the boroughs of Lansdale, Norristown, and Pottstown to count persons visually.⁹

⁵ A listing of workshop attendees is included in Appendix II.

⁶ The information packet is included in Appendix II.

⁷ A copy of the newspaper notices is included in Appendix III.

⁸ A list of attendees at the site tour is included in Appendix III.

⁹ A copy of the point-in-time count tally is included in Appendix IV.

For the 2005 count, the homeless persons in Montgomery County totaled 629. Of these, 374 were counted in emergency shelters, 202 were in transitional shelters, and 53 were unsheltered. There were 152 families with children, totaling 468 individuals. All of these families were sheltered in either emergency or transitional shelters. Single individuals or persons in families without children numbered 161, 53 of whom were not sheltered. Homeless subpopulations were identified as shown.

Homeless Subpopulations

Homeless Subpopulation	Sheltered	Unsheltered	Total
Chronically homeless	57	5	62
Severely mentally ill	35	0	35
Chronic substance abuse	47	0	47
Veterans	8	0	8
Persons with HIV/AIDS	1	0	1
Victims of domestic violence	43	0	43
Unaccompanied youth under 18	0	0	0

2. Needs and Priorities of the Homeless

Other assessments have provided additional information concerning the needs of the homeless in Montgomery County. The services most frequently requested by the homeless population are affordable child care, jobs that pay a livable wage, affordable housing, and public transportation. A county-wide needs assessment study released in October 2006 identified two immediate priorities for serving the homeless population: expanding the capacity of supportive transitional housing programs, and increasing the stock of affordable housing. This report noted that without sufficient transitional housing, the homeless often were unable to overcome other problems—mental illness, drug and alcohol problems, domestic abuse, or poverty—which had caused them to become homeless.

A county-wide housing inventory conducted from January 2005 to January 2006 tallied the beds available in emergency shelters, transitional housing, and permanent supportive housing. The chart below shows the number of beds available and the unmet need for each type of housing. The inventory counts beds in two categories: individual beds and beds for families with children.

Continuum of Care -- Housing Gap Analysis

	Current Inventory	Units Development	Unmet Need/Gap
INDIVIDUAL BEDS			
Emergency Shelter	82	0	83
Transitional Housing	39	0	40
Permanent Supportive Housing	33	10	67
Total	154	10	150
FAMILIES WITH CHILDREN BEDS			
Emergency Shelter	143	0	147
Transitional Housing	269	0	116
Permanent Supportive Housing	134	0	71
Total	521	0	334

Many services for the homeless are provided in Norristown, which is the county seat for Montgomery County. Some services are also provided in the towns of Abington, Pennsburg, Lansdale, and Pottstown. However, a lack of public transportation serving much of the suburban area in Montgomery County makes it difficult or impossible for many homeless persons to access these services.

Another barrier to the homeless obtaining needed services is the lack of coordinated information. The 2006 county-wide needs assessment study indicated that the lack of adequate information on where and how to get services was a significant problem. In the North Penn area of the county, churches are the most common source of outreach and information for the homeless. In addition to providing some emergency shelter and food kitchens/food banks, churches often act as clearinghouses to refer the needy to organizations that can provide additional services. Finally, Montgomery County is working toward the goal of establishing a 211 telephone system, which is a centralized information and referral source for all social services, including services for the homeless. This goal is a funding initiative of the Southeastern Pennsylvania United Way.

In Montgomery County, the majority of the homeless are families with children. The immediate need for this population is access to housing of all types – emergency shelter, transitional housing, and permanent supportive housing. Additional needs include affordable child care for these families, jobs that pay well enough to provide adequate economic support, and transportation to jobs and child care.

3. Inventory of Facilities That Provide Services to the Homeless

The following inventory includes facilities providing emergency shelter, transitional housing, permanent supportive housing, and supportive services for the homeless in Montgomery County.

Facilities and Services for the Homeless

Facility	Emerg. Shelter	Transitional Housing	Permanent Housing	Supportive Services
Indian Valley Housing Corp.	x	x		
Interfaith of the Main Line	x			
Interfaith Housing Alliance	x	x		x
Laurel House	x	x		
Morning Star Ministries		x		
Salvation Army Pottstown	x	x	x	x
Salvation Army Norristown	x	x	x	x
Sisters of Charity	x			
CADCOM				x
Community Housing Services		x		
Eldernet				x
Mental Health Association	x	x		x
Office of Aging & Adult Services		x		x
Open Line				x
Baptist Children's Services	x			
Cradle of Hope		x		
Big Brothers/Big Sisters		x		x
Our Lady's House		x		
Family Services			x	
Hedwig House			x	x

4. Efforts to Document Homelessness in Worcester Township

Homeless statistics are kept for Montgomery County as a whole. Since the jurisdiction of the LRA is Worcester Township, the LRA focused its efforts on identifying homeless persons in Worcester Township. The following organizations were contacted to determine whether they serve clients from Worcester Township:

- Coordinated Housing Outreach Center
- Methacton School District Home & School Visitor
- Montgomery County Department of Housing & Community Development
- Montgomery County Housing Coalition
- Montgomery County Office of Aging & Adult Services
- Salvation Army of Norristown

Each of these organizations informed the LRA that they had no record of serving any homeless clients from Worcester Township.

Information concerning the property and the public workshop was sent to all of the member organizations of the Montgomery County Housing Coalition.¹⁰ Two homeless services providers sent representatives to the public workshop and the site tour: Genesis Housing Corporation and Habitat for Humanity. After the public site tour, Genesis Housing Corporation advised the LRA that it would not be submitting an NOI. The LRA received no further communication from Habitat for Humanity.

One homeless services provider, the American Legion Housing for Homeless Veterans, contacted the LRA for information concerning the site and sent a representative to the site tour. Following the site tour, the LRA received no further communication from the American Legion Housing for Homeless Veterans.

D. OUTREACH TO PUBLIC BENEFIT ORGANIZATIONS

The LRA received inquiries concerning the possible reuse of the site from four local organizations – Animal Welfare Project, Methacton Community Theater, Methacton United Soccer Club, and Methacton School District. Information concerning the property was provided to each organization.

1. A representative of the Animal Welfare Project (AWP) attended the public workshop and site tour and met several times with a representative of the LRA regarding possible uses of the site. AWP was not able to submit an NOI for the property, but the organization expressed interest in the possibility of co-using portions of the site along with Worcester Township, if the township applied to acquire the property for public park and recreational purposes. Ultimately it was determined that since the majority of AWP's proposed activities at the site would not be open to the public, these activities would not be compatible with public park and recreational uses. In March 2007, AWP withdrew its expression of interest in the property.
2. Representatives of Methacton Community Theater (MCT) expressed interest in creating a permanent home for the organization, including a community theater, rehearsal rooms, and storage facilities, in the main building at the site. Several MCT board members attended a tour of the building. Following that tour, MCT presented a proposal to the LRA regarding building

¹⁰ A list of the organizations to which this information was sent is included in Appendix IV.

a community theater in the main building. This proposal is described in a separate section below.

3. The Methacton United Soccer Club expressed interest in acquiring the site for the development of private playing fields for its member teams. The organization was informed that since it is a private sports club, it is not eligible to apply for reuse of the property as a public benefit organization. No further communication was received by the LRA from the Methacton United Soccer Club.
4. Representatives of the Methacton School District attended the workshop and site tour and submitted a Notice of Interest to reuse the site as a parking and maintenance facility for the district's fleet of school buses. This NOI is discussed in more detail in a separate section below.

The Worcester Volunteer Fire Department was invited by the LRA to tour the site and consider the property for the possible relocation of the fire company. Following the site tour, Fire Department officials informed the LRA that the site was not suitable for their needs.

The Skippack barracks of the Pennsylvania State Police was invited to tour the site and consider the property for the possible relocation of this barracks. The LRA received no further communication from representatives of the Skippack barracks of the Pennsylvania State Police.

The Montgomery County Fire Academy was invited to tour the site and consider it for the possible expansion of the Fire Academy's programs. After Fire Academy representatives toured the site, the LRA received no further communication from the Fire Academy.

The LRA was contacted by three companies interested in development opportunities at the site. The LRA included these entities on the contact list for all meetings and communications.

On October 24, 2006, the LRA sent a notice to all homeless services providers and public benefit organizations that had expressed interest in the reuse of the property. These organizations were invited to make a brief presentation to the LRA concerning their possible interest in using a portion of the property in cooperation with Worcester Township's proposed acquisition of the site for public park and recreational purposes through the National Park Service's Federal Lands to Parks Program. The Animal Welfare Project and the Methacton Community Theater indicated their interest in making such presentations. Accordingly, a public meeting was scheduled.

On November 15, 2006, the LRA held a public meeting at which the Animal Welfare Project and the Methacton Community Theater made presentations indicating their interest in using a portion of the site in cooperation with Worcester Township, if the township were to acquire the site for public park and recreational purposes under the Federal Lands to Parks Program.

As of December 8, 2006, the deadline for submission of NOIs to the LRA, the LRA received one NOI, from Methacton School District, for the reuse of a portion of the site. The LRA also was aware that Worcester Township was interested in acquiring the property for public park and recreational use under the Federal Lands to Parks Program.

E. PUBLIC PLANNING MEETINGS

In January 2007, the LRA scheduled a series of three public meetings to identify community goals and vision for the site, to review the NOI that was received, and to review other proposals for the reuse of the property. In preparation for these meetings, the LRA notified all public benefit organizations, interested residents, and other entities of the meeting schedule. The meeting schedule was also posted on the Worcester Township website and listed in an article in the winter 2007 issue of the Worcester Township newsletter.¹¹

Residents living within approximately 0.75 miles of the property were notified of the meeting schedule by letter.¹² Three community-based organizations in the township (the Farmers Union Horse Company, the Friends of Worcester, and the Worcester Historical Society) were contacted by letter and invited to submit their comments concerning reuse of the site to the LRA.¹³ The Worcester Township Planning Commission was asked to submit its recommendations concerning reuse of the site.

1. First Public Planning Meeting – February 21, 2007

On February 21, 2007, the LRA held a public meeting to identify community goals and vision for the site. The meeting began with a powerpoint presentation that included information about the property and the surrounding area. Representatives of three community organizations then presented their comments concerning the future use of the property. Two of these organizations also sent letters to the LRA with their comments.¹⁴ The Worcester Township Planning Commission submitted a memorandum containing its evaluation and recommendations for the site.¹⁵

Following the presentation, LRA members and residents asked questions and offered their comments.¹⁶ Additional comments from residents were received after the meeting.¹⁷ This presentation was also given at the Meadowood Retirement Community in Worcester Township for the benefit of those residents who were unable to travel to the public meeting on February 21.

2. Second Public Planning Meeting – March 21, 2007

On March 21, 2007, the LRA held a second public meeting. At this meeting, representatives of Methacton School District presented their NOI to use a portion of the property as a parking and maintenance facility for the district's fleet of school buses. Following the presentation, comments and questions from the LRA and the public were received.

3. Third Public Planning Meeting – April 18, 2007

On April 18, 2007, the LRA held a third public meeting to consider other possible reuses of the site. A presentation was made concerning the township's possible acquisition of the property for public park and recreational uses under the Federal Lands to Parks Program. Methacton Community Theater, a local nonprofit organization, made a presentation concerning their proposal to build a community

¹¹ Copies of the website posting and the article in the Worcester Township newsletter are included in Appendix V.

¹² The letter to residents is included in Appendix V.

¹³ The letters to community organizations are included in Appendix V.

¹⁴ The letters submitted by community organizations are included in Appendix VI.

¹⁵ The memorandum from the Worcester Township Planning Commission is included in Appendix VI.

¹⁶ The minutes of the February 21, 2007, meeting are included in Appendix VI.

¹⁷ Additional comments from residents following the February 21 meeting are included in Appendix VI.

theater in the Assembly Hall of the main building, in cooperation with the township's proposed use of the site for park and recreational uses. The LRA and residents asked questions and offered comments on these proposed uses.

At the conclusion of this planning process, the LRA had under consideration (1) the NOI from Methacton School District to use a portion of the site for a school bus facility, and (2) Worcester Township's proposal to acquire the site for public park and recreational purposes, including a community center.. Methacton Community Theater proposed to partner with the township on the public park proposal, contributing funding, expertise, and labor to construct a community theater in one room of the main building on the property. No proposals for reuse were received by homeless services providers.

F. LRA DECISION ON RECOMMENDATION FOR REUSE

The LRA held a public meeting on June 4, 2007, to make its recommendation for the reuse of the property. This meeting was advertised in the local newspaper¹⁸ and on the Worcester Township website.

The LRA reviewed the two proposals for reuse – (1) the NOI from Methacton School District, and (2) the proposal from Worcester Township to acquire the property for public park and recreational use under the Federal Lands to Parks Program. There was no interest in the property from homeless services providers. The LRA discussed the positive and negative aspects of each proposal.

1. Methacton School District NOI

The school district proposed to use approximately two-thirds of the property, not including the main building, for a school bus parking and maintenance facility. No use was proposed for the main building and the remaining one-third of the property.

The school district's proposal involves over 200 school buses and employees' cars entering and exiting the property twice a day, including during morning rush hour, when the local roads are already clogged with pass-through traffic. The LRA noted that members of the public had expressed their concern about the inability of the local road system to handle this increased traffic, and also about the presence of so many large buses at the two intersections closest to the site, both of which are narrow and dangerous. It was noted that many expensive road improvements would be required to handle this increase in traffic, including the addition of several traffic signals, road widening and straightening, and the construction of turn lanes. Finally, neither the township nor the school district would receive any economic benefit from this proposal, since local and school taxes would be abated on a site owned by the school district. The LRA received no positive comments from the public, from community groups, or from the Worcester Planning Commission regarding this proposal.

The positive aspects of this proposal, from the viewpoint of the school district, were:

- The school bus parking and maintenance facilities have insufficient space at their current location at the high school. There is no room to expand these facilities, and in fact the space now occupied by the buses is needed to provide additional parking for staff and students.

¹⁸ Copies of the newspaper advertisements are included in Appendix VII.

- The existing parking facilities and maintenance building on the Army Reserve property could be used by the district with little additional expenditure for renovation or improvement.
- The cost of the property would be discounted 40%, saving the district some of the cost of land acquisition.

2. Worcester Township Proposal – Federal Lands to Parks Program

From the beginning of the planning process, Worcester Township expressed interest in acquiring the property for public park and recreational uses under the Federal Lands to Parks Program. In the fall of 2006, the LRA contacted the sponsoring agency for this proposed reuse, the National Park Service. An LRA representative spoke with Mr. William L. Huie, Program Manager of the Federal Lands to Parks Program, Southeast Region, to discuss the proposed reuse of this property as a public park. Mr. Huie explained the opportunities and requirements of the FLP program. As the LRA worked through the reuse planning process, Mr. Huie advised the LRA and the township as to which co-uses would be appropriate under the guidelines of the Federal Lands to Parks program.

Throughout the planning process, township residents expressed support for a park at this site. At the February 2007 public planning meeting, it was noted that the portion of the township in which the Army base is located has no neighborhood park where residents can walk, jog, bicycle, or ride horseback. Many of these activities are no longer safe to pursue on the township's narrow roads because of the amount of pass-through traffic on these roads.

The 2006 Worcester Open Space Plan indicated that the township's needs for park facilities are barely being met by its current park system. The township's population has grown considerably in the past 25 years and is expected to continue to grow, creating a need for additional park facilities, and particularly for indoor facilities. The township currently has one community park, Heebner Park, at the center of the township. This facility includes a tot lot, several soccer and baseball fields, several short walking and bridle trails, and outdoor tennis and basketball courts. There are no indoor recreational facilities at this park, nor are any planned at this time.

The township has three smaller neighborhood parks, each less than 10 acres in size. One is located at the far eastern edge of the township and includes several ballfields and a tot lot. The second is located at the western edge of the township and includes one ballfield and a short walking trail. The third is currently undeveloped due to environmental issues. A park owned by an adjacent municipality is located in the northern corner of the township. It includes ballfields, picnic pavilions, and walking trails. A county-owned historic site is located near the center of the township and provides walking trails. A state park located on the western edge of the township provides trails for walking and horseback riding.¹⁹

The Army base property already contains the basic infrastructure necessary for a public park – water, on-site septic, outdoor lighting, adequate parking, and security fencing. An overview of the outdoor recreational opportunities at the site concluded that the internal road and sidewalk system at the Army Reserve base could be converted into a paved loop trail for various active recreational opportunities. These trails could be made accessible to persons with disabilities. Portions of the large paved parking areas could be converted into tennis, volleyball, and basketball courts, and an outdoor ice skating rink. The site has good possibilities for future off-road trail connections to the township's municipal park system and to two proposed multi-use trail corridors.

¹⁹ A map of the existing park facilities in the township is included in Appendix VII.

The township currently has no facility at which evening classes, summer camps, and indoor cultural activities can be held. Methacton Community Theater (MCT) has expressed interest in partnering with the township to build a community theater in the main building's large Assembly Hall. MCT's productions, as well as other community activities, could be held in this facility. The classrooms in the main building would be usable for community education offerings and meeting spaces for community groups.

A Facilities Assessment was commissioned by the township to assess the current condition of the buildings on the site, in order to assist the LRA in its decision-making process. The Facilities Assessment concluded that the main building is well built and reasonably well maintained. The value of the building was estimated to be much greater than the cost to demolish it or renovate it for use as a community center. The report included recommendations and cost estimates for the renovations necessary to conform this building to current code requirements for public occupancy and ADA accessibility.

The LRA discussed the fact that there will be maintenance and renovation expenses associated with developing this property as a public park. The schedule and budget for renovating and using the site infrastructure and the buildings will be included in the township's Federal Lands to Parks Program application to the National Park Service, which is currently being prepared for submission to the NPS.

Township officials recognized that there may be environmental contamination on the site resulting from its years of use as a Nike missile base and an Army Reserve Center. The township is aware of the information presented in the Environmental Condition of Property report, and also of the Pennsylvania Department of Environmental Protection's position that further testing is needed to assess the type, location, and extent of any contamination. If the township's proposal under the Federal Lands to Parks Program is approved, the township expects to work with the Pennsylvania Department of Environmental Protection, the Army, and the Army Corps of Engineers to address any site contamination in a manner that will be appropriate for the anticipated recreational uses of the site.

3. Public Comments and Reuse Decision

Following the LRA's summation of these two reuse proposals, public comments were received.²⁰ A member of the Methacton Community Theater's Board of Directors confirmed the organization's desire to partner with the township to construct a community theater in the Assembly Hall of the main building. The LRA noted that the majority of public sentiment, both at this meeting and at previous public meetings, supported the reuse of this site as a park. After careful consideration of the options, the LRA voted unanimously to recommend to the Office of the Secretary of Defense that the property be transferred to Worcester Township for public park and recreational use under the Federal Lands to Parks Program.

The township's application to acquire the property under the FLP program is now being prepared and is expected to be submitted to the National Park Service shortly. At this time, the township envisions an initial five-year implementation plan, during which the facility is proposed to be renovated and reconfigured for public use, including a loop trail system, outdoor tennis and basketball courts, a picnic area, and an outdoor ice skating area. Interpretive signage will commemorate the historical significance of the former Nike missile base on the property.

²⁰ The minutes of the June 4, 2007, public meeting are included in Appendix VII.

The main building is envisioned to be developed as a community center, to be renovated and phased into use in stages. The first floor is proposed to include a community theater, classrooms, a multipurpose room, and offices to house the township's Parks and Recreation Department. The maintenance building will be used by the township's Public Works Department to house its parks maintenance equipment.

G. PUBLIC PRESENTATION OF DRAFT BASE REUSE PLAN

The draft Base Reuse Plan was presented to residents at a public meeting on June 20, 2007. This meeting was advertised in the local newspaper pursuant to public notice.²¹

At the meeting, the LRA presented a review of the public outreach process, including the homeless assistance submission, and an analysis of the two reuse proposals that were received for the property. The pros and cons of each proposal were reviewed. Proposed park and recreational uses for specific areas and buildings on the property were presented.²²

The LRA summarized its recommendation that the property be transferred to Worcester Township for public park and recreational use under the Federal Lands to Parks Program, and noted that this option has been discussed with the National Park Service's Southeast Region office. The LRA is expected to rezone the property AGR (agricultural), in accord with the current zoning of surrounding properties, with an intended municipal use for public park and recreational purposes.

Many members of the public who commented on the plan indicated their support for the decision to take advantage of the opportunity to add this property to Worcester's municipal park system, and to acquire a facility that can be used in the future as a community center.²³ A representative of Methacton Community Theater confirmed the organization's desire to work with Worcester Township to build a community theater in the main building at the site.

At the conclusion of the meeting, Resolution No. 07-15 was passed to adopt the recommendation as presented in the Base Reuse Plan.²⁴

H. ENVIRONMENTAL CONSIDERATIONS

The Environmental Condition of Property report noted numerous environmental issues at the site, including underground storage tanks that were not properly closed and multiple areas of possible environmental contamination as a result of the property's use as a Nike missile site. The report also identified some areas of the property where additional testing will be needed to identify and characterize possible soil and groundwater contamination. The property was previously identified as a potential contributor to the soil-to-groundwater TCE contamination in the area. In addition, asbestos- and lead-containing materials were reported to be located in the buildings.

A review of the Environmental Condition of Property report was prepared for the LRA. This review indicated several additional areas of concern.²⁵ The Pennsylvania Department of Environmental Protection also reviewed the Environmental Condition of Property report and submitted their

²¹ A copy of the newspaper advertisement is included in Appendix VIII.

²² A site plan showing proposed uses at the property is included in Appendix VIII.

²³ Detailed notes of the public comments received at this meeting are included in Appendix VIII.

²⁴ A copy of Resolution No. 07-15 is included in Appendix VIII.

²⁵ A copy of this report is included in Appendix IX.

comments to the Army.²⁶ Among other issues, some areas of the property with potential for contamination were not addressed in the Environmental Condition of Property report. In addition, several reports that were previously prepared concerning environmental issues at the site have not yet been obtained and reviewed. The history of uses at the property indicates that a comprehensive schedule of environmental testing should be established for the site, in order to identify and characterize areas of contamination.

The Army and the Pennsylvania Department of Environmental Protection's Office of Federal Facilities for the Land Recycling Program are parties to a Cooperative Multi-Site Agreement to address contamination at former Nike missile sites across Pennsylvania. As a starting point, the scope of work for a standard Nike site should be reviewed to determine the types of contamination that might be found on the Nike portion of this property.

DEP's Land Recycling Office is expected to be involved in the remediation and redevelopment of the site under the Pennsylvania Land Recycling Act. It is expected that representatives of the township, the LRA, the Army, and DEP will work together throughout the site investigation, choice of remedy, and remediation processes to assure that the site investigation is complete and that cleanup standards are chosen which are protective of human health and the environment for the recommended future use of the site.

²⁶ A copy of this letter is included in Appendix IX.

Appendices to Base Reuse Plan

Appendix I – Surplus Property Declaration and Formation of LRA

Federal Register Notice of Availability of Surplus Property
Resolution No. 06-07
Federal Register Notice of Recognition of North Penn USARC LRA

Appendix II – Public Workshop

Newspaper advertisement of public workshop
List of attendees at public workshop
Information packet distributed at public workshop and provided to individuals and organizations upon request

Appendix III – Site Tour

Newspaper advertisement of site tour
List of attendees at site tour

Appendix IV – Homeless Assistance Submission

Point-in-time homeless population count, 1-26-05

Homeless services providers in the Montgomery County Continuum of Care to which notices of the availability of surplus property, public workshop, and site tour were sent

Appendix V – Outreach to Public Benefit Organizations

Notice posted on Worcester Township website
Article in Worcester Township newsletter
Letter mailed to residents living near Army Reserve Base
Letters mailed to community organizations in Worcester Township

Appendix VI – Public Planning Meeting

Letters received from community organizations
Memorandum submitted by Worcester Planning Commission
Minutes of February 21, 2007, public meeting
Comments from residents received following public meeting of February 21, 2007

Appendix VII – LRA Decision on Recommendation for Reuse

Newspaper advertisements of June 4, 2007, public meeting and reuse decision
Map of public parkland in Worcester Township
Minutes of June 4, 2007, public meeting and reuse decision
Resolution No. 07-15

Appendix VIII – Public Presentation of Draft Base Reuse Plan

Newspaper advertisement of June 20, 2007, public meeting and presentation of draft
Base Reuse Plan

Site plan showing proposed uses at the property

Detailed notes of public comments at June 20, 2007, public meeting

Appendix IX – Environmental Considerations

Review of Environmental Condition of Property Report – Memo to LRA

Letter from Federal Facilities Section, Bureau of Waste Management, Pennsylvania
DEP, regarding Environmental Condition of Property Report

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

**APPENDIX I –
SURPLUS PROPERTY DECLARATION AND FORMATION OF LRA**

Federal Register Notice of Availability of Surplus Property

Resolution No. 06-07

Federal Register Notice of Recognition of North Penn USARC LRA

Federal Register Notice of Availability of Surplus Property

BRAC 2005 Screenings

SUMMARY: These properties have been determined surplus to the United States needs in accordance with the Defense Base Closure and Realignment Act of 1990, Public Law 101-510, as amended, and the 2005 Base Closure and Realignment Commission Report, as approved, and following screening with Federal agencies and Department of Defense components.

FOR FURTHER INFORMATION CONTACT: Headquarters, Department of the Army, Assistant Chief of Staff for Installation Management, Base Realignment and Closure Division, Attn:DAIM-BD, 600 Army Pentagon, Washington DC 20310-0600, (703)-601-2418. For information regarding a specific property, a contact is provided on the list of properties below.

SUPPLEMENTARY INFORMATION: Under the provisions of the Federal Property and Administrative Services Act of 1949, as amended, the Defense Base Closure and Realignment Act of 1990, as amended, and other public benefit conveyance authorities, this surplus property may be available for conveyance to State and local governments and other eligible entities for public benefit purposes. Notices of interest from representatives of the homeless, and other interested parties located in the vicinity of any listed surplus property should be submitted to both the recognized Local Redevelopment Authority and Army point of contact as listed above, or where no Local Redevelopment Authority has been recognized, the notice of interest shall be submitted to the Army point of contact as listed. Notices of interest from representatives of the homeless shall include the information required by 32 CFR Part 176.20(c)(2)(ii). Recognized Local Redevelopment Authorities, or the Army where no Local Redevelopment Authority has been recognized, shall assist interested parties in evaluating the surplus properties for the intended use. Deadlines for notices of interest shall be 90 days from the date a corresponding notice is published in a newspaper of general circulation in the vicinity of the installation. The properties are listed by state alphabetically.

Pennsylvania

FACILITY TITLE	ADDRESS	ACRES	POC
1LT RAY S. MUSSELMAN MEMORIAL USARC	1020 SANDY HILL ROAD, NORRISTOWN	3.45	Base Realignment and Closure Division Attn:DAIM-BD 600 Army Pentagon Washington DC 20310 armybrac2005@hqda.army.mil
BLOOMSBURG USARC	1469 OLD BERWICK ROAD, BLOOMSBURG	2	Scott Township Local Redevelopment Authority Scott Township Municipal Building 350 Tenny Street Bloomsburg, PA 17815 (570) 784-9114
GERMANTOWN VETERANS MEMORIAL USARC	5200 WISSAHICKON AVENUE, PHILADELPHIA	5	City of Philadelphia Planning Commission One Parkway, 13 th Floor 1515 Arch Street Philadelphia, PA 19102 (215) 683-4615
HORSHAM MEMORIAL USARC	936 EASTON ROAD, HORSHAM	7	Horsham Township Authority for NASJRB (Naval Air Station Joint Reserve Base) 1025 Horsham Road Horsham, PA 19044 (215) 643-3131
JAMES W. REESE USARC	500 W. 24TH STREET (UPLAND), CHESTER	5	Reese Local Redevelopment Authority 224 Castle Avenue Upland, PA 19015 (610) 874-7317
LEWISBURG USARC	HAFER AND JPM ROADS, LEWISBURG	10	Kelly Township Local Redevelopment Authority

			551 Zeigler Rd Lewisburg, Pennsylvania 17837 (570) 524-0437
LYCOMING MEMORIAL USARC	1605 FOUR MILE DRIVE, WILLIAMSPORT	6.59	Loyalstock Township Board of Supervisors 2501 East Third Street Williamsport, PA 17701 (570) 323-6151
NORTH PENN MEMORIAL USARC	1625 BERKS ROAD, NORRISTOWN	19	North Penn USARC Redevelopment Authority 1721 Valley Forge Road, P.O.Box 767 Worcester, PA 19490 (610) 584-1410
PHILADELPHIA MEMORIAL AFRC	2838-98 WOODHAVEN ROAD, PHILADELPHIA	9	City of Philadelphia Planning Commission One Parkway, 13 th Floor 1515 Arch Street Philadelphia, PA 19102 (215) 683-4615
WILSON-KRAMER USARC	2940 AIRPORT ROAD, BETHLEHEM	4.5	Bethlehem Local Redevelopment Authority 10 East Church Street Bethlehem, PA 18018 (610) 865-7085
WILKES-BARRE USARC	1001 HIGHWAY 315 SOUTH, WILKES BARRE	4	Township of Plains Plains Township Municipal Building 126 Main Street Plains, PA 18705 (570) 829-3439

Worcester Township Resolution 06-07

**WORCESTER TOWNSHIP
BOARD OF SUPERVISORS**

MONTGOMERY COUNTY, COMMONWEALTH OF PENNSYLVANIA

RESOLUTION NO. 06-07

AUTHORIZING THE FORMATION OF THE NORTH PENN USARC REDEVELOPMENT AUTHORITY TO BE RECOGNIZED BY THE SECRETARY OF DEFENSE, THROUGH THE OFFICE OF ECONOMIC ADJUSTMENT, AS THE ENTITY BEING RESPONSIBLE FOR THE REUSE AND/OR REDEVELOPMENT OF THE NORTH PENN USARC SITE LOCATED AT 1625 BERKS ROAD, WORCESTER, PA.

WHEREAS, Worcester Township (the "Township") shall devise a reuse and/or redevelopment plan for the North Penn USARC site situate at 1625 Berks Road, Worcester, PA (the "Base") due to the Base's inclusion on the 2005 Base Realignment and Closure (BRAC) list.

WHEREAS, the of Supervisors of Worcester Township (the "Board") desires to create and establish the North Penn USARC Redevelopment Authority as the body charged with the task of monitoring the closure and redevelopment of the Base consistent with local needs.

WHEREAS, the Board shall be the body that composes the North Penn USARC Redevelopment Authority.

WHEREAS, the North Penn USARC Redevelopment Authority, and any persons designated by it, shall be authorized to communicate with various federal agencies to devise a reuse and/or redevelopment plan for the Base.

WHEREAS, the North Penn USARC Redevelopment Authority shall conduct such studies and recommend such plans as it may deem appropriate in order to facilitate and maximize sound and desirable land redevelopment and use, and economic stability following the closure of the Base.

NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors of Worcester Township hereby authorizes the formation of the North Penn USARC Redevelopment Authority and grants it the following powers:

1. To serve as Worcester Township's sole representative to the Department of Defense, its military departments, agencies and representatives.
2. To serve as Worcester Township's sole authority to manage any and all grants related to the reuse and/or redevelopment of the Base administered by the Department of Defense or the State of Pennsylvania; and
3. To serve as Worcester Township's sole authority to develop, coordinate and disseminate the plan for the reuse and/or redevelopment of the Base.

FURTHERMORE, the Board hereby confers upon the North Penn USARC
Redevelopment Authority the sole power and authority to represent Worcester Township in any
and all matters pertaining to planning for the reuse and/or redevelopment of the Base.

ADOPTED this 11th day of April, 2006.

BOARD OF SUPERVISORS OF WORCESTER TOWNSHIP

By: 
JOHN R. HARRIS, Chairman

Attest: 
ARTHUR C. BUSTARD, Secretary

Federal Register Notice of Recognition of LRA

28668

Federal Register / Vol. 71, No. 95 / Wednesday, May 17, 2006 / Notices

Dated: May 11, 2006.

Susan K. Brown,
Records Officer, USPTO, Office of the Chief
Information Officer,
Architecture, Engineering and Technical
Services, Data
Architecture and Services Division.

[FR Doc. E6-7484 Filed 5-16-06; 8:45 am]

BILLING CODE 3510-16-P

**COMMODITY FUTURES TRADING
COMMISSION**

Sunshine Act Meetings

AGENCY HOLDING THE MEETING:

Commodity Futures Trading
Commission.

TIME AND DATE: 11 a.m., Friday, June 2,
2006.

PLACE: 1155 21st St., NW., Washington,
DC, 9th Floor Commission Conference
Room.

STATUS: Closed.

MATTERS TO BE CONSIDERED:

Surveillance matters.

**CONTACT PERSON FOR MORE
INFORMATION:**

Eileen A. Donovan, 202-418-5100.

**Eileen A. Donovan, Acting Secretary of the
Commission** [FR Doc. 06-4638 Filed 5-12-
06; 4:42 pm]

BILLING CODE 6351-01-M

**COMMODITY FUTURES TRADING
COMMISSION**

Sunshine Act Meetings

AGENCY HOLDING THE MEETING:

Commodity Futures Trading
Commission.

TIME AND DATE: 11 a.m., Friday, June 9,
2006.

PLACE: 1155 21st St., NW., Washington,
DC, 9th Floor Commission Conference
Room.

STATUS: Closed.

MATTERS TO BE CONSIDERED:

Surveillance matters.

**CONTACT PERSON FOR MORE
INFORMATION:**

Eileen A. Donovan, 202-418-5100.

**Eileen A. Donovan, Acting Secretary of the
Commission** [FR Doc. 06-4639 Filed 5-12-
06; 4:42 pm]

BILLING CODE 6351-01-M

**COMMODITY FUTURES TRADING
COMMISSION**

Sunshine Act Meetings

AGENCY HOLDING THE MEETING:

Commodity Futures Trading
Commission.

TIME AND DATE: 11 a.m., Friday, June

16, 2006. **PLACE:** 1155 21st St., NW.,
Washington, DC, 9th Floor Commission
Conference Room.

STATUS: Closed.

MATTERS TO BE CONSIDERED:

Surveillance matters.

**CONTACT PERSON FOR MORE
INFORMATION:**

Eileen A. Donovan, 202-418-5100.

Eileen A. Donovan,

Acting Secretary of the Commission.

[FR Doc. 06-4640 Filed 5-12-06; 4:42 pm]

BILLING CODE 6351-01-M

**COMMODITY FUTURES TRADING
COMMISSION**

Notice of Meeting; Sunshine Act

AGENCY HOLDING THE MEETING:

Commodity Futures Trading
Commission.

TIME AND DATE: 11 a.m., Friday, June
23, 2006.

PLACE: 1155 21 St., NW., Washington,
DC, 9th Floor Commission Conference
Room.

STATUS: Closed.

MATTERS TO BE CONSIDERED:

Surveillance matters.

**CONTACT PERSON FOR MORE
INFORMATION:**

Eileen A. Donovan, 202-418-5100.

**Eileen A. Donovan, Acting Secretary of the
Commission** [FR Doc. 06-4641 Filed 5-12-
06; 4:42 pm]

BILLING CODE 6351-01-M

**COMMODITY FUTURES TRADING
COMMISSION**

Notice of Meeting; Sunshine Act

AGENCY HOLDING THE MEETING:

Commodity Futures Trading
Sunshine Act Meetings

TIME AND DATE: 11 a.m., Friday, June
30, 2006.

PLACE: 1155 21st St., NW., Washington,
DC, 9th Floor Commission Conference
Room.

STATUS: Closed.

MATTERS TO BE CONSIDERED:

Surveillance matters.

**CONTACT PERSON FOR MORE
INFORMATION:**

Eileen A. Donovan, (202) 418-5100.

**Eileen A. Donovan, Acting Secretary of the
Commission** [FR Doc. 06-4642 Filed 5-12-
06; 4:42 pm]

BILLING CODE 6351-01-M

DEPARTMENT OF DEFENSE

**Office of the Secretary Base Closure
and Realignment**

AGENCY: Department of Defense, Office
of Economic Adjustment.

ACTION: Notice.

SUMMARY: This Notice is provided
pursuant to section 2905(b)(7)(B)(ii) of the

Defense Base Closure and Realignment Act
of 1990. It provides a
partial list of military installations
closing or realigning pursuant to the 2005
Defense Base Closure and Realignment
(BRAC) Report. It also provides a
corresponding listing of the
Local Redevelopment Authorities (LRAs)
recognized by the Secretary of Defense,
acting through the Department of Defense
Office of Economic Adjustment (OEA), as
well as the points of contact, addresses, and
telephone numbers for the LRAs for those
installations. Representatives of state and
local governments, homeless
providers, and other parties interested in the
redevelopment of an installation should
contact the person or organization listed.
The following information will also be
published simultaneously in a newspaper of
general circulation in the area of each
installation. There will be additional
Notices providing this same information
about LRAs for other closing or realigning
installations where surplus government
property is available as those LRAs are
recognized by the OEA.

DATES: Effective Date: May 9, 2006.

FOR FURTHER INFORMATION

CONTACT:

Director, Office of Economic
Adjustment, Office of the Secretary of
Defense, 400 Army Navy Drive, Suite
200, Arlington, VA 22202-4704, (703) 604-
6020.

**Local Redevelopment Authorities (LRAs)
for Closing and Realigning Military
Installations**

Arkansas

Installation Name: Leroy R. Pond
USARC

LRA Name: City of Fayetteville
Point of Contact: Susan B. Thomas,
Public Information and Policy
Advisor, City of Fayetteville
Address: 113 W. Mountain, Fayetteville, AR
72701

Phone: (479) 575-8330

Installation Name: Rufus N. Garrett Jr.
USARC

LRA Name: City of El Dorado Local
Redevelopment Authority.
Point of Contact: Toby Anderson,
Director, El Dorado Housing
Authority

Address: One Parkway, 13th Floor,
1515 Arch Street, Philadelphia, PA
19102

Phone: (215) 683-4615
Installation Name: James W. Reese
USARC

LRA Name: Reese Local
Redevelopment Authority
Point of Contact: Richard B.
McClintock, Chairperson
Address: 224 Castle Avenue, Upland,
PA 19015
Phone: (610) 874-7317

**Installation Name: North Penn
Memorial USARC**
LRA Name: North Penn USARC
Redevelopment Authority
Point of Contact: John R. Harris,
Chairman, Board of Supervisors,
Towanship of Worcester
Address: 1721 Valley Forge Road,
P.O. Box 767, Worcester, PA 19490
Phone: (610) 584-1410

Installation Name: Philadelphia
Memorial USARC
LRA Name: City of Philadelphia
Point of Contact: Thomas A. Chapman,
Acting Executive Director,
Philadelphia City Planning
Commission

Address: One Parkway, 13th Floor,
1515 Arch Street, Philadelphia, PA
19102

Phone: (215) 683-4615
Installation Name: Wilson-Kramer
USARC

LRA Name: Bethlehem Local
Redevelopment Authority
Point of Contact: Tony Hanna, Director
of Community and Economic
Development, City of Bethlehem
Address: 10 East Church Street,
Bethlehem, PA 18018
Phone: (610) 865-7085

Rhode Island

Installation Name: PT Lloyd S. Cooper
III USARC

LRA Name: Warwick Local
Redevelopment Agency
Point of Contact: Richard Crenca,
Principal Planner, Warwick Planning
Department, City of Warwick
Address: City Hall Annex, 3275 Post
Road, Warwick, RI 02886
Phone: (401) 738-2000 ext. 6292

Installation Name: Quinta-Gamelin
USARC
LRA Name: Town Council Local

Redevelopment Authority
Point of Contact: Diane C. Mederos,
Town Administrator, Town of Bristol
Address: Town Hall, 10 Court Street,
Bristol, RI 02809
Phone: (401) 253-7000 ext. 133

Texas

Installation Name: Alice USARC
LRA Name: Alice Local
Redevelopment Authority
Point of Contact: Pete Anaya, P.E.,
City Manager, City of Alice
Address: P.O. Box 3229, Alice, TX
78333

Phone: (361) 668-7210
Installation Name: Boswell Street
USARC

LRA Name: San Antonio Local
Redevelopment Authority
Point of Contact: Ramiro Cavazos,
Director, City of San Antonio
Economic Development Department
Address: P.O. Box 839966, San
Antonio, TX 78283
Phone: (210) 207-8040

Installation Name: Callaghan Road
USARC

LRA Name: San Antonio Local
Redevelopment Authority
Point of Contact: Ramior Cavazos,
Director, City of San Antonio
Economic Development Department
Address: P.O. Box 839966, San
Antonio, TX 78283
Phone: (210) 207-8040

Installation Name: Grimes Memorial
USARC

LRA Name: Abilene Local
Redevelopment Authority
Point of Contact: Larry D. Gilley, City
Manager, City of Abilene
Address: P.O. Box 60, Abilene, TX
79604

Phone: (325) 676-6206
Installation Name: Houston USARC #2

LRA Name: City of Houston
Point of Contact: Forest R. "Bob"
Christy, Director of Real Estate,
Building Services
Department, City of Houston
Address: P.O. Box 1652, Houston, TX
77251

Phone: (713) 247-2639

Installation Name: Houston USARC #3

LRA Name: City of Houston
Point of Contact: Forest R. "Bob"
Christy, Director of Real Estate,
Building Services
Department, City of Houston
Address: P.O. Box 1652, Houston, TX
77251

Phone: (713) 247-2639
Installation Name: Jules E. Muchert
USARC

LRA Name: City of Dallas
Point of Contact: Theresa O'Donnell,
Director of Development Services,
City of Dallas
Address: 1500 Marilla Street, 5DN,
Dallas, TX 75201

Phone: (214) 670-4127
Installation Name: Naval Reserve
Center Orange

LRA Name: Orange NRC Local
Redevelopment Authority
Point of Contact: Gene Bouillion, Port
Director & CEO, Orange County
Navigation & Port District
Address: P.O. Box 2410, Orange, TX
77631

Phone: (409) 833-4363
Installation Name: Watts-Guillot
USARC

LRA Name: Red River Redevelopment
Authority

Point of Contact: Duane Lavery,
Executive Director, Red River
Redevelopment Authority
Address: 107 Chapel Lane, New
Boston, TX 75570

Phone: (903) 223-8741
Installation Name: Wichita Falls
USARC

LRA Name: City of Wichita Falls
Point of Contact: David A. Clark,
Director of Community Development,
City of Wichita Falls
Address: P.O. Box 1431, Wichita Falls,
TX 76307
1300 Seventh Street, Wichita Falls, TX
76301

Phone: (940) 761-7451
Installation Name: William Herzog
Memorial USARC

LRA Name: City of Dallas
Point of Contact: Theresa O'Donnell,
Director of Development Services,
City of Dallas
Address: 1500 Marilla Street, 5DN,
Dallas, TX 75201
Phone: (214) 670-4127

Vermont

Installation Name: Chester Memorial
USARC

LRA Name: Chester Local
Redevelopment Authority
Point of Contact: Susan B. Spalding,
Town Manager, Town of Chester

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

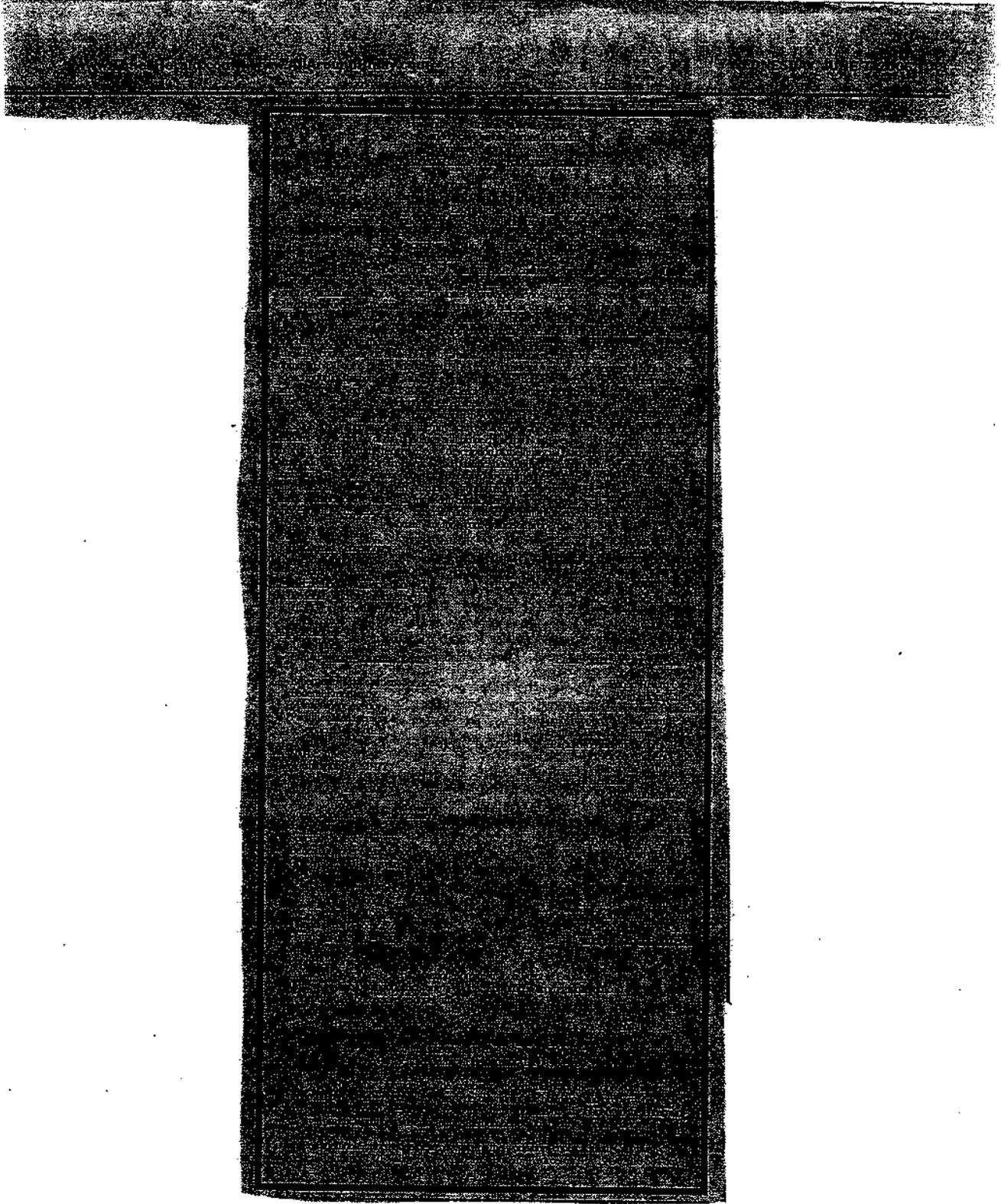
**APPENDIX II
PUBLIC WORKSHOP**

Newspaper advertisement of public workshop

List of attendees at public workshop

Information packet distributed at public workshop and provided to individuals and organizations upon request

Newspaper Advertisement of Public Workshop



List of Attendees at Public Workshop

<u>NAME</u>	<u>ORGANIZATION</u>
Linda Adkins	Animal Welfare Project
Matthew Schelly	Montgomery County Planning Commission
Jeffrey Miller, Ed.D	Methacton School District
Judith Memberg	Genesis Housing Corp.

Information Packet Distributed at Public Workshop and Provided to Individuals and Organizations upon Request

To Notice of Interest Applicants:

On behalf of the North Penn U.S. Army Reserve Center Local Redevelopment Authority, thank you for your interest in the North Penn USARC property.

Federal Law mandates that the North Penn U.S. Army Reserve Center (North Penn USARC) close by September 15, 2011. The Federal base closure process is complex and is carefully regulated by law. The Defense Base Closure and Realignment Act of 1990, as amended, places responsibility for base reuse planning in the hands of the Local Redevelopment Authority (LRA). The LRA is responsible for preparing a base redevelopment plan for the North Penn USARC which appropriately balances Worcester Township's need for economic redevelopment, other types of development, and homeless assistance in the community in the vicinity of the installation.

The LRA has 270 days from December 8, 2006, the date it plans to complete its outreach process, to develop a redevelopment plan and a homeless assistance submission. In preparing the redevelopment plan, the LRA will review and evaluate all Notices of Interest submitted by members of the public, state and local governments, and non-profit entities interested in reusing portions of the North Penn USARC facility. The LRA must then determine which Notices of Interest, if any, to support.

The deadline for receipt of your Notice of Interest is December 8, 2006. Please note that any questions you may have should be directed to me, the Local Redevelopment Authority (LRA) Project Manager, rather than to the North Penn USARC facility. I will be happy to assist you throughout this application process.

This Notice of Interest application packet includes instructions for submitting a Notice of Interest as well as background information about the property. When additional information about the environmental condition of the property and/or personal property becomes available, we will forward it to you for consideration. This packet contains the following documents:

- 1) Instructions for Completing the Notice of Interest
- 2) Contact Information for Questions and Responses
- 3) Department of the Army Surplus Property Notice for Vol. 71, No. 89 of the Federal Register, dated 05-09-06
- 4) A copy of the LRA Notice of Interest Solicitation
- 5) Aerial Photo of Property
- 6) Base Facilities Information
- 7) Public Outreach Workshop and Tour Information
- 8) Background Information on Base Property
- 9) Illustrative List of Permissible Public Benefit Conveyances

The following documents will be supplied to applicants when made available to the LRA:

- 10) Environmental Condition of Property Report
- 11) Personal Property Inventory

Thank you for your interest in the North Penn U.S. Army Reserve Center.

Sincerely,

Susan G. Caughlan
Project Manager, North Penn USARC LRA
c/o Worcester Township

1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

**NORTH PENN U.S. ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY
OFFICIAL NOTICE**

INSTRUCTIONS FOR COMPLETING NOTICE OF INTEREST

A. NOTICE OF INTEREST CONTENTS

A Notice of Interest should be prepared according to the specifications set forth in this section (as applicable) for both content and sequence.

Each Notice of Interest for Homeless Assistance or other Public Benefit Conveyances should include the following (as applicable):

ORGANIZATIONAL PROFILE

1. Legal name of government entity or non-profit institution requesting use of buildings or property at the North Penn U.S. Army Reserve Center.
2. Address and telephone number of applicant.
3. Name and title of contact person.
4. Name and title of person(s) authorized to complete purchase, and/or execute any lease or agreements. Attach a copy of the legal authority permitting these persons to complete such transactions.
5. Statement regarding whether the applicant is a state, a political sub-division of a state, or a private non-profit, tax exempt organization under Section 501(c)(3) of the 1986 Internal Revenue Code. If the applicant is a private not-for-profit entity, attach a copy of the IRS recognition of its Section 501(c)(3) exemption status.
6. A copy of the document showing statutory or legal authority under which the applicant is authorized by law to acquire and hold title to property or to lease property.
7. For applicants other than public agencies:
 - a. A description of the organization, year founded and brief history, major accomplishments and organizational goals.
 - b. A listing of all principals in the organization and any proposed on-site program managers who would participate in management activities of any proposed program. Provide appropriate credentials, as well as a description of previous related experience.
 - c. An organizational chart for the organization.
 - d. Guidelines of personnel procedures for recruiting, affirmative action, and equal opportunity outreach, resident hiring, personnel selection, training, evaluation, and discipline.
 - e. Provide the organization's connection to the community and the community interest that will be

served.

8. A copy of current constitution/charter/by-laws or Articles of Incorporation as appropriate.

PROPOSED PROGRAM

1. A detailed narrative description of the proposed use of the property or building.
2. A detailed assessment of the need for the proposed program. In the case of homeless assistance programs, include an explanation of what homeless needs in the communities in the vicinity of the North Penn U.S. Army Reserve Center you will be fulfilling.
3. Provide the following:
 - a) Explain the need to expand existing facilities.
 - b) Identify any anticipated expansion of services that may result from improvement of facilities for the proposed program, as applicable.
 - c) Identify whether the need for the proposed program is a result of the requirement to meet or comply with established state standards.
 - d) Include a statement that applicant does not currently possess real estate suitable for the proposed program.
4. In the case of a homeless assistance program, provide a description of how the program will be coordinated with other homeless assistance programs in the communities in the vicinity of the North Penn U.S. Army Reserve Center.
5. A description of the time required to commence the proposed program.

BUILDINGS OR PROPERTY NECESSARY TO CARRY OUT PROGRAM

1. A narrative description of requested facilities, land, buildings, improvements, easements and related equipment. (Describe by building number and include an illustrative map).

In the case of homeless service providers, describe the suitability of the buildings and property for the proposed homeless assistance program and needs of the homeless in the communities in the vicinity of the North Penn U.S. Army Reserve Center.
2. Is the applicant requesting a deed transfer? Would the applicant agree to the Redevelopment Authority owning the property and building and leasing such properties to the applicant at no cost?
3. Indicate what land use and zoning requirements or entitlements are necessary for the applicant to implement its Proposed Program in and around the buildings and property requested.
4. Indicate whether existing buildings will be used and describe any new construction or rehabilitation that is anticipated on the requested property necessary for program implementation.

ORGANIZATIONAL CAPACITY

Evidence that the management team is capable of successfully operating any proposed program will be examined. The applicant must demonstrate a record of past performance and experience with similar programs, viability, and financial and administrative solvency and stability based on the following:

1. A general description of past performance and experience operating similar programs to those proposed.
2. A list of all projects/properties owned or managed (as applicable to the request) by the applicant including:
 - Development name, address, and telephone number and name of on-site manager.
 - Number and type of units (emergency shelter, transitional housing, supportive housing, SRO 1-4 BR, market, etc. and the type of assistance).
 - Photos demonstrating exterior and interior physical condition of buildings.
 - Supportive services provided at each site.
 - Years managed/owned.
 - Audited financial statements for last two years on each site.

In the case of homeless service providers, also provide the current number of units or beds assisting the homeless, or government subsidized low and moderate income units owned or managed and detailed information for at least three programs/projects owned and/or managed.

3. Plans for the expansion of the organization to meet an increased demand for services from the proposed programs. Identify any organizational adjustments needed for proposed programs, including number of employees needed and job descriptions.
4. Provide a list of management functions that will be staffed at the property or in buildings requested and whether those management functions will be provided by the applicant or contracted out to a third party. If contracted out, please provide information regarding the selection process for those management services and how often a site manager will visit the property.
5. For other than public agencies, the following information must be provided:
 - a) A full detailed and audited financial statement for the last two years (including copies of tax returns for the last two fiscal years) of the organization's assets/reserves, liability, balances, makeup of current assets, accounts receivable, balance of revenues and expenses, and net worth. This report must include a balance sheet and income statement. If the applicant is a partnership or joint venture, individual financial statements must be submitted for each general partner or joint venturer thereof. A full disclosure of whether any of the organization's officers, principals, or partners have declared bankruptcy in the last five (5) years.
 - b) A disclosure as to whether any of the organization's officers, principals or partners have been convicted of a felony in the last five (5) years and the nature of the conviction.
 - c) A minimum of five (5) business references, including names, addresses, telephone numbers, and the nature and magnitude of the business association in each instance. These references must be persons or firms with whom you have transacted business during the past five (5) years.
 - d) A minimum of five (5) financial references, including names, addresses, and telephone numbers for each reference. It is required that two (2) of the five (5) references be banks or savings and loan institutions; also indicate the type of relationship.
6. Homeless providers must attach a management plan demonstrating the experience and ability to manage the programs enumerated in the Notice of Interest.

a) In the case of transitional housing programs, applicants shall submit a proposed management plan that includes:

- 1) An affirmative marketing strategy, including examples of marketing materials prepared by the organization's personnel, dealing specifically with the mission to provide homeless families with a residential family environment where self advancement and responsibility can be fostered within a prescribed program.
- 2) An application screening procedure to determine tenant eligibility and certification of income, including methods for maintaining and periodically purging the waiting list, as well as disqualifying factors, including requirements that clients be drug free and sober while in the facility and that clients not have been previously convicted of assault, battery, possession or sale of controlled substances, burglary, or weapons charges, or any other crimes against persons, in the last five (5) years.
- 3) Orientation procedures for new residents to the mission goals established.
- 4) A method for linking specific social services and resources must be established.
- 5) Copy of a typical lease that would reflect the transitional aspects of the program.
- 6) A procedure for enforcing the rules of the lease and any additional program standards of conduct, including an eviction procedure.
- 7) Where the homeless assistance program is based upon a charge to the individuals who use the facility, please provide the following:
 - (a) Rent collection procedures, including policies regarding late payments and damage charges.
 - (b) Vacancy turnaround procedures.
- 8) Procedures for complete financial accounting and periodic reports.

A formal accounting and financial reporting process will be required through contracting with a Certified Public Accountant whereby monthly financial statements, bank reconciliations, and a review of accounting transactions are provided to the Redevelopment Authority on a monthly basis by an individual separate from program management. An organization must also contract with an independent accountant to provide audited financial statements on an annual basis. The treasurer of each organization shall countersign all check copies on a monthly basis in conjunction with approving the Financial Statement. This dual signature must occur after the checks are issued and represent an auditable expenditure review process.

Documented financial controls and procedure policies must also be available/or developed which prescribe the standard methodology used in handling accounting transactions inclusive of cash receipts, accounts payable activities, journal vouchers, and internal bank and investment transfers. Such policies and procedures must acknowledge the scope of financial activities conducted by the organization.

- 9) A property maintenance inspection program for buildings and units (as applicable) and grounds, including a capital improvement program, purchasing, and inventory procedures.

- 10) Provisions for a security program.
 - 11) A reporting system that will enable the community to evaluate the progress of the program on an annual basis.
 - 12) Indicate whether resident support services will be provided both on-site and off-site.
- b) In the case of emergency shelter programs, applicants shall submit a proposed management plan that includes:
- 1) A screening procedure for acceptance of individuals into the program, including eligibility criteria and disqualifying factors, including the requirement that clients be drug free and sober while in the facility and not have been previously convicted of assault, battery, possession or sale of controlled substances, burglary, or weapons charges, or any other crimes against persons, in last five (5) years.
 - 2) A typical agreement that would be signed by program clients setting forth standards of conduct and behavior, including eviction procedures.
 - 3) Specific support services to be provided on-site and methods for creating linkages with other existing programs off-site.
 - 4) Same submittal requests as identified for transitional housing program in subsection (a) as follows: (4), (6), (8), (9), (10), (11), and (12).
- c) In the case of other non-housing programs, a proposed management plan that also includes the same submittal requests listed under transitional housing programs in subsection (a), items (4), (8), (9), (10), and (11).

FINANCIAL PLAN

Information in this section will not be released to the public without the written consent of the applicant.

Prepare a financial plan for the specific building, property, and/or program requested which shall include:

- a) A development proforma that identifies estimated costs associated with ensuring buildings and property that can be used for the proposed program. These costs shall include the cost of any needed construction to comply with local building codes and/or ADA requirements and to bring properties into conformance with design standards envisioned in the Reuse Plan, the costs of any proposed improvement, and costs associated with securing needed utility services. Soft costs such as architectural/engineering services, survey work, title services, legal services, and government permit fees shall also be identified. In addition, any financing costs for said improvements shall be identified. A schedule for completion and financing of all improvements shall be provided.
- b) A five- (5) year projected operating cash flow analysis for the program which shall include: annual gross income (with sources of all income and revenue-producing operations for the program identified), a complete breakdown of expenses (including, as applicable, vacancy costs, utility costs, maintenance costs, management fees, security costs, capital and operating reserves, salaries and benefits, insurance, real estate taxes, other expenses (postage, collections, training, supplies, etc.), net operating income before debt service and depreciation, debt service, net operating income after debt service and depreciation.
- c) Provide a detailed statement of the source of anticipated funding to establish the program operations, including a statement that funds are currently available for expenditure to carry out

the proposed program.

If the proposed program contemplates major development costs and funds are not currently available, identify plans and sources of funds to carry out the proposed program and development.

- d) Indicate whether the applicant is receiving federal, state, or local grants or subsidies for programs they provide. If so, what percentage of total organization revenues relies on these grants?

B. PREPARATION OF NOTICES OF INTEREST

1. The Notice of Interest must be submitted typewritten on 8-1/2" x 11" white paper and must be bound in a secure manner.
2. If the applicant wishes to submit material and data which is not specifically requested, do not include the information with the Notice of Interest. This material must be included in an "Additional Data" section only. The following are examples of Additional Data:
 - Standard brochures and pictures/photographs
 - Promotional material with minimal technical content
 - Generalized narrative of supplementary information
 - Supplementary graphic materials
3. If the Notice of Interest is made by an individual, it shall be signed with the full name of the applicant, and his or her address shall be given. If it is made by a partnership, it shall be signed with the partnership name and by an authorized general partner and the full name and address of each general partner shall be given. If it is made by a joint venture, it shall be signed with the full name and address of each partner thereof. If it is submitted by a corporation, it shall be signed by the president and secretary in the corporate name.
4. No telegraphic, telephonic, or faxed responses, or modification to a proposal will be accepted by the North Penn U.S. Army Reserve Center LRA.

SUBMITTAL OF NOTICE OF INTEREST

1. The original Notice of Interest and six (6) additional copies must be submitted.
2. It is the sole responsibility of the applicant to see that the Notice of Interest is received before the submission deadline. An applicant shall bear all risks associated with delays in the United States Mail.
3. Deadline for Submission of Notice of Interest
 - a) The North Penn U.S. Army Reserve Center LRA will receive Notices of Interest at the location indicated below:

Susan G. Caughlan
c/o Worcester Township
1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490
610-584-5619

- b) **The time and date set for receipt of Notices of Interest is on or before Friday, December 8,**

2006, prior to 4:00 p.m. Eastern Standard Time.

All questions concerning the meaning or intent of these Instructions for Completion of Notice of Interest should be directed in writing to Susan G. Caughlan at the above noted address for a formal response.

Contact Information for Questions and Responses

Susan G. Caughlan
Administrative Coordinator
North Penn US Army Reserve Center LRA, Worcester, PA

c/o Worcester Township
1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

610-584-5619
sgc@dca.net

BRAC 2005 Screenings

SUMMARY: These properties have been determined surplus to the United States needs in accordance with the Defense Base Closure and Realignment Act of 1990, Public Law 101-510, as amended, and the 2005 Base Closure and Realignment Commission Report, as approved, and following screening with Federal agencies and Department of Defense components.

FOR FURTHER INFORMATION CONTACT: Headquarters, Department of the Army, Assistant Chief of Staff for Installation Management, Base Realignment and Closure Division, Attn:DAIM-BD, 600 Army Pentagon, Washington DC 20310-0600, (703)-601-2418. For information regarding a specific property, a contact is provided on the list of properties below.

SUPPLEMENTARY INFORMATION: Under the provisions of the Federal Property and Administrative Services Act of 1949, as amended, the Defense Base Closure and Realignment Act of 1990, as amended, and other public benefit conveyance authorities, this surplus property may be available for conveyance to State and local governments and other eligible entities for public benefit purposes. Notices of interest from representatives of the homeless, and other interested parties located in the vicinity of any listed surplus property should be submitted to both the recognized Local Redevelopment Authority and Army point of contact as listed above, or where no Local Redevelopment Authority has been recognized, the notice of interest shall be submitted to the Army point of contact as listed. Notices of interest from representatives of the homeless shall include the information required by 32 CFR Part 176.20(c)(2)(ii). Recognized Local Redevelopment Authorities, or the Army where no Local Redevelopment Authority has been recognized, shall assist interested parties in evaluating the surplus properties for the intended use. Deadlines for notices of interest shall be 90 days from the date a corresponding notice is published in a newspaper of general circulation in the vicinity of the installation. The properties are listed by state alphabetically.

Pennsylvania

FACILITY TITLE	ADDRESS	ACRES	POC
1LT RAY S. MUSSELMAN MEMORIAL USARC	1020 SANDY HILL ROAD, NORRISTOWN	3.45	Base Realignment and Closure Division Attn:DAIM-BD 600 Army Pentagon Washington DC 20310 armybrac2005@hqda.army.mil
BLOOMSBURG USARC	1469 OLD BERWICK ROAD, BLOOMSBURG	2	Scott Township Local Redevelopment Authority Scott Township Municipal Building 350 Tenny Street Bloomsburg, PA 17815 (570) 784-9114
GERMANTOWN VETERANS MEMORIAL USARC	5200 WISSAHICKON AVENUE, PHILADELPHIA	5	City of Philadelphia Planning Commission One Parkway, 13 th Floor 1515 Arch Street Philadelphia, PA 19102 (215) 683-4615
HORSHAM MEMORIAL USARC	936 EASTON ROAD, HORSHAM	7	Horsham Township Authority for NASJRB (Naval Air Station Joint Reserve Base) 1025 Horsham Road Horsham, PA 19044 (215) 643-3131
JAMES W. REESE USARC	500 W. 24TH STREET (UPLAND), CHESTER	5	Reese Local Redevelopment Authority 224 Castle Avenue Upland, PA 19015 (610) 874-7317
LEWISBURG USARC	HAFER AND JPM ROADS, LEWISBURG	10	Kelly Township Local Redevelopment Authority 551 Zeigler Rd Lewisburg, Pennsylvania 17837 (570) 524-0437

LYCOMING MEMORIAL USARC	1605 FOUR MILE DRIVE, WILLIAMSPORT	6.59	Loyalstock Township Board of Supervisors 2501 East Third Street Williamsport, PA 17701 (570) 323-6151
NORTH PENN MEMORIAL USARC	1625 BERKS ROAD, NORRISTOWN	19	North Penn USARC Redevelopment Authority 1721 Valley Forge Road, P.O.Box 767 Worcester, PA 19490 (610) 584-1410
PHILADELPHIA MEMORIAL AFRC	2838-98 WOODHAVEN ROAD, PHILADELPHIA	9	City of Philadelphia Planning Commission One Parkway, 13 th Floor 1515 Arch Street Philadelphia, PA 19102 (215) 683-4615
WILSON-KRAMER USARC	2940 AIRPORT ROAD, BETHLEHEM	4.5	Bethlehem Local Redevelopment Authority 10 East Church Street Bethlehem, PA 18018 (610) 865-7085
WILKES-BARRE USARC	1001 HIGHWAY 315 SOUTH, WILKES BARRE	4	Township of Plains Plains Township Municipal Building 126 Main Street Plains, PA 18705 (570) 829-3439

**Availability of Surplus Federal Property to State and Local Eligible Parties,
Including Homeless Service Providers
(North Penn USARC Redevelopment Authority)**

As required by the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, as amended (the Redevelopment Act) and its implementing regulations, the North Penn USARC Redevelopment Authority (the LRA) for the North Penn Memorial U.S. Army Reserve Center (USARC) is seeking notices of interest (NOIs) for surplus property at the installation.

State and local governments, homeless service providers and other interested parties may submit NOIs no later than 4:00 p.m. on December 8, 2006. A listing of surplus property at the North Penn USARC was published by the Department of the Army in the *Federal Register* on May 9, 2006. The complete listing can be obtained by calling the LRA contact person identified below.

NOIs for homeless assistance may be submitted by any State or local government agency or private nonprofit organization that provides or proposes to provide services to homeless persons and/or families from Worcester Township.

A workshop will be held at the Worcester Township Community Hall, 1031 Valley Forge Road, Fairview Village, on Thursday, June 29, at 7:30 p.m. which will include an overview of the base redevelopment planning process; information on the site, including buildings; and information on the NOI process. To register for this workshop, please contact the LRA contact person listed below by June 22. Attendance at this workshop is not required to submit an NOI, but is highly encouraged.

NOIs from homeless service providers must include: (i) a description of the homeless assistance program that the homeless service provider proposes to carry out at the North Penn USARC; (ii) a description of the need for the program and the population to be served; (iii) a description of the extent to which the program is or will be coordinated with other homeless assistance programs in the communities in the vicinity of the North Penn USARC; (iv) information about the physical requirements necessary to carry out the program, including a description of the buildings and property at the North Penn USARC that are necessary in order to carry out the program; (v) a description of the financial plan, the organizational structure and capacity, prior experience, and qualifications of the organization to carry out the program; and (vi) an assessment of the time required to commence carrying out the program.

Entities interested in obtaining property through a public benefit conveyance (PBC), other than a homeless assistance conveyance, are invited to contact the following federal agency offices to find out more about each agency's PBC program and to discuss with the agency the entity's potential for qualifying for a conveyance of property:

Parks and Recreation:

Wendy Ormont
National Center for Recreation & Conservation
Federal Lands to Parks Program
U.S. Department of the Interior
National Park Service
1849 C Street NW
Washington, DC 20240
Telephone: 202-354-6915
E-mail: wendy_ormont@nps.gov

Educational Uses:

Peter Wiczorek
Director, Federal Real Property Group
U.S. Department of Education
33 Arch Street, Suite 1140
Boston, MA 02110
Telephone: 617-289-0172
E-Mail: peter.wiczorek@ed.gov

Emergency Management Services:

Federal Emergency Management Agency
Facilities Management & Services Division
500 C Street SW
Washington, DC 20472

Public Health Care:

John Hicks
Chief, Space Management Branch
Division of Property Management/PSC
Department of Health & Human Services
Parklawn Building, Room 5B-41
5600 Fishers Lane
Rockville, MD 20857
Telephone: 301-443-2265
E-mail: rpb@psc.gov

Corrections and Law Enforcement:

Janet Quist
Special Projects Manager
Bureau of Justice Assistance
Office of Justice Programs
U.S. Department of Justice
810 7th Street NW, Room 4413
Washington, DC 20531
Telephone: 202-353-2392
E-mail: janet.quist@usdoj.gov

Public Airports:

Contact the Regional Federal Aviation Administration Point of Contact.
Visit: www.faa.gov/about/office_org/headquarters_offices/arp/regional_offices/
to identify the appropriate regional office.

Self-Help Housing:

Janet Golrick
Assistant Deputy-Assistant Secretary
Office of Multi-Family Housing
Department of Housing and Urban Development
451 7th Street SW, Room 6110
Washington, DC 20410
Telephone: 202-708-2495
E-mail: janet_m.golrick@hud.gov

Historic Monument:

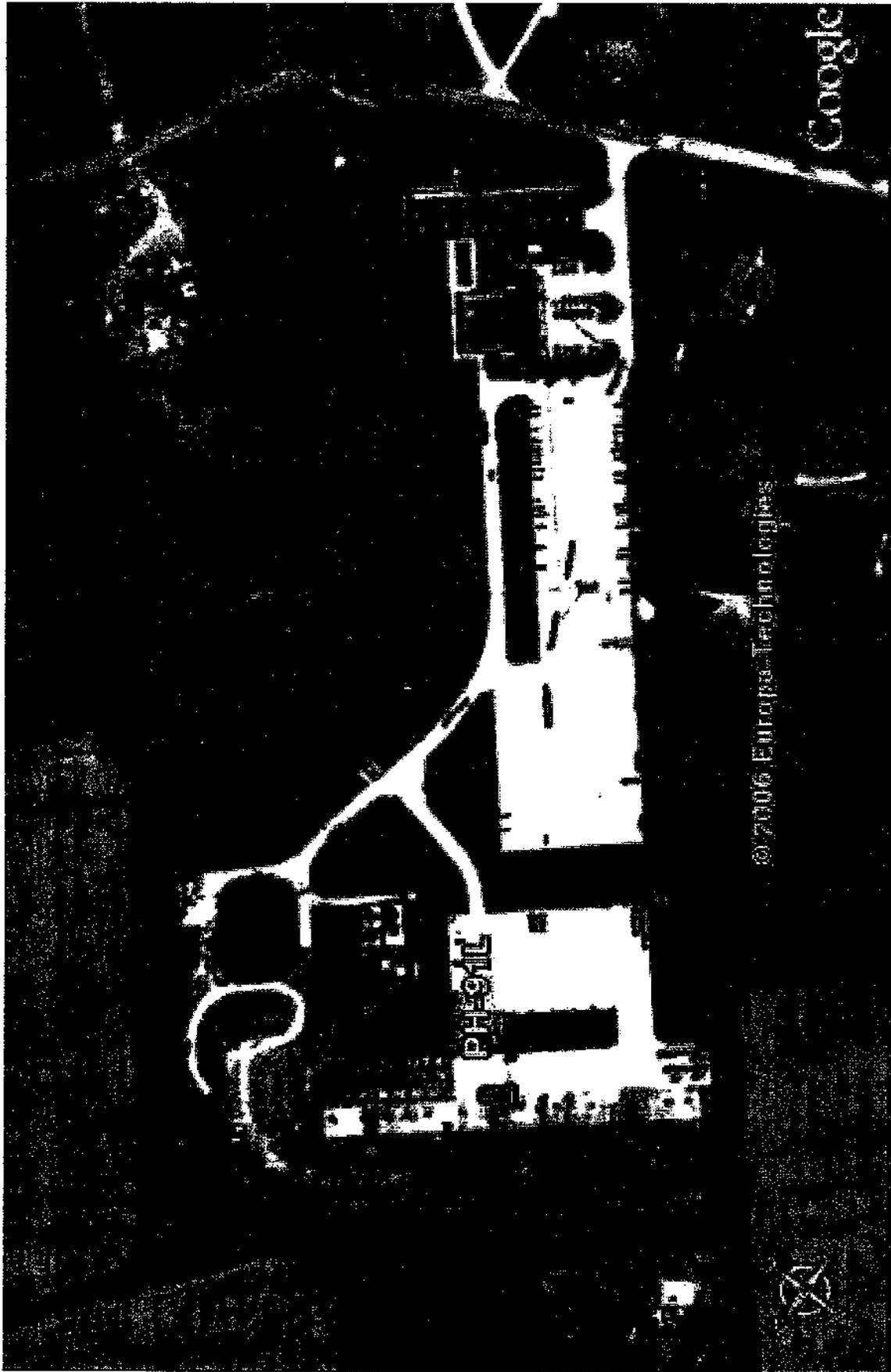
Contact the Military Department (Disposal Agency)

Wildlife Conservation (Only States May Apply)

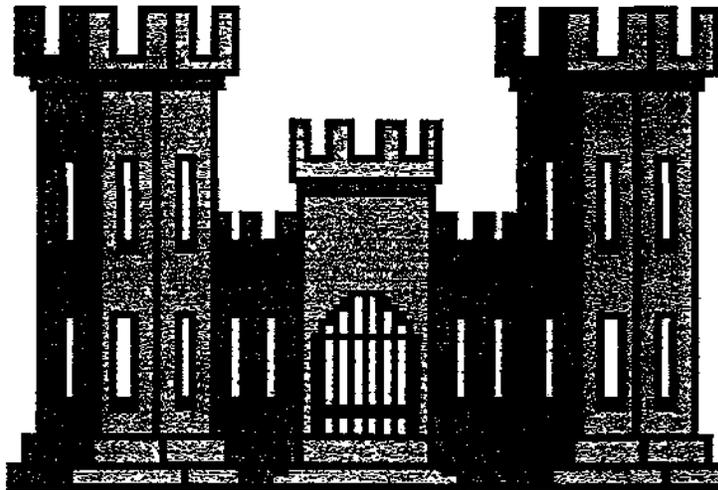
Contact the Military Department (Disposal Agency)

NOIs for PBCs must include: (i) a description of the eligibility for the proposed transfer, (ii) the proposed use of the property, including a description of the buildings and property necessary to carry out such proposed use, (iii) time frame for occupation, and (iv) the benefit to the community from such proposed use, including the number of jobs the use would generate.

For additional information or to register for the workshop, contact Susan Caughlan, c/o Worcester Township, 1721 Valley Forge Road, P.O. Box 767, Worcester, Pa 19490, 610-584-5619, or sgc@dca.net.



**DEPARTMENT OF THE ARMY
UNITED STATES ARMY FACILITY ENGINEER GROUP
416TH ENGINEER COMMAND
10 S.100 SOUTH FRONTAGE ROAD
DARIEN, IL 60561-1780**



**ENGINEERING AND ENVIRONMENTAL
FACILITY ASSESSMENT**

For

North Penn USAR Center

Worcester, Pennsylvania Facility I.D. No. PA139

Date of Visit: 31 MAY - 1 JUN 2000

PREPARED BY:

**FACILITY ENGINEER GROUP (416th ENCOM) FACILITY ENGINEER CENTER -
NORTHEAST**

**FORT INDIANTOWN GAP
FACILITY ENGINEERING TEAM**
Annville, Pennsylvania

10 SEP 2000

SECTION 1: EXECUTIVE SUMMARY

INSTALLATION NAME: NORTH PENN USAR CENTER

INSTALLATION NUMBER: PA139 DATE: 31 MAY - 1 JUN 2000

1. The Ft. Indiantown Gap Facility Engineer Team (Team) conducted an Engineering and Environmental Facility Assessment (E2FA) for the North Penn USAR Center on 31 MAY - 1 JUN 2000. The facility was constructed in 1974 on a former Nike Missile site, which included three capped subsurface missile silos. The center consists of five buildings; the main USAR center (39,187 SF), the Organizational Maintenance Shop (OMS) (6,909 SF), the domestic water pump house (262 SF), the waste water treatment building (42 SF), and the fire pump house (565 SF). The buildings are hilly utilized along with the MEP and the POV parking areas. Security fencing surrounds the entire complex. The surrounding area consists of mostly high-end residential homes and some farmland. The facility is located adjacent to a multilane thoroughfare. The facility is occupied by the following units:

UNIT	Assigned Strength	Authorized Strength	Full-Time	
			Military	Civilian
153 ^d (LSO) Legal Support Organization	42	70*	1	0
427 th Transportation Company PLS (Palletized Load System)	88	142	5	1
307 ^t Army Band	33	41	0	1
369 th Engineer Platoon - Fire Fighters	37	28	0	1

Authorized Strength to include 200% manning for officers, which also includes 29 authorized off-site.

2. The USAR Center is located on 17 acres of land in Worcester, PA. The main building was constructed in 1974 and is two-story pre-cast concrete and structural steel frame, slab on grade. The main building has no basement, except for the mechanical room, which is below grade. The main building is a "T" shaped configuration. The 5-bay OMS is brick and steel construction of approximately 46 feet by 145 feet.

Since its construction in 1974, there have been several system upgrades/replacements, including; new roofing on all buildings on 8 DEC 95 (10- year warranty), on-site sewer and water line replacement in 1999, domestic well, pump, and associated equipment in 1999, conversion from oil to natural gas and fuel oil heat in 1995. The main building heating system is dual fuel #2 fuel oil and natural gas, with gas as the primary fuel. Infrared gas heaters augment this heating system in the drill hall. The OMS is heated with gas-fired infrared heaters (2) and a single unit heater.

4. During the visit, a significant facility issue involving the potable water supply system was noted, warranting urgent action. The 99th RSC was notified of this matter in a memo dated 9 JUL 2000, a copy of which is contained in Enclosure C. There is a potentially significant safety issue arising from the fact that a new on-site water well and ancillary equipment was recently installed and placed into service without any water quality monitoring. Center

personnel currently cook in and drink water provided by this system. The system has no water treatment system, such as chlorine, and neither initial nor periodic water quality monitoring has been performed. Mr. Nick Taylor, Facility Manager, was advised to post all consumption points advising center personnel to not drink the water. He was also advised to arrange for bottled water and for necessary testing.

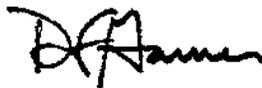
5. Environmental Compliance: The Environmental Compliance Assessment portion of the E2FA identified a total of 14 findings; 3 Class I, 6 Class III, 5 Regulatory Health/Safety findings. The Class I findings relate to drinking water quality, PCB labeling, and wastewater treatment permitting. A copy of the findings along with recommended corrective actions is attached as Enclosure A. This enclosure is also intended to serve as the facility's quadrennial external environmental assessment report.
6. Facility Condition Survey: An evaluation of the overall condition of the facility was performed in accordance with USARC Surveyor's User Manual dated July 1997. A copy of the Facility Condition Survey is provided in Enclosure B, and a copy has been forwarded directly via e-mail to LTC Gary Jackson, USARC-DCSENG.
7. Real Property Maintenance: The main building is constructed of concrete masonry unit (CMU) interior walls covered by pre-fabricated concrete panels and brick veneer exterior walls with a concrete floor. The OMS consists of CMU interior walls and brick veneer exterior walls with a concrete floor. The overall condition of the facility is fair, as there are numerous items that are in need of maintenance and repair action. It was obvious that some of these issues have been present for some time. For example, many ceiling tiles were stained, some dating back to 1996, when leaking unit heaters were replaced. According to center personnel, many of the tiles were also stained with animal waste from rodents and/or birds which had previously entered the building (over the ceilings) through open wall penetrations. Another example involves damage to the perimeter fencing (see photo #6, Section 5) from a fallen tree, which reportedly occurred in 1994 or 1995. This damage compromises the physical security of the facility and could be easily corrected by a contractor funded by the use of the Impac credit card.

The team observed the lack of effective contractor oversight relating to three (3) separate utility construction efforts to replace the natural gas, water, and sewer lines. Improper asphalt patching of associated trenching several years ago has resulted in damage to adjacent asphalt during snow removal operations. Work continues (dumping of topsoil) on the sewer line replacement project without any coordination with on-site personnel. A bend in the sewer line was installed without a manhole. No drawings were available to indicate whether or not this was the design, but common practice for all pipe direction changes is to install a manhole at all such changes.

A contractor visits the site daily to perform maintenance and monitoring of the on-site septic treatment system, yet there is no effort to monitor the on-site domestic water system. Facility personnel were not familiar with the operation of any of these systems to provide effective oversight. During the site visit, the assessment team reviewed the RISER report, which contained previously submitted work orders. This RISER report has been annotated to

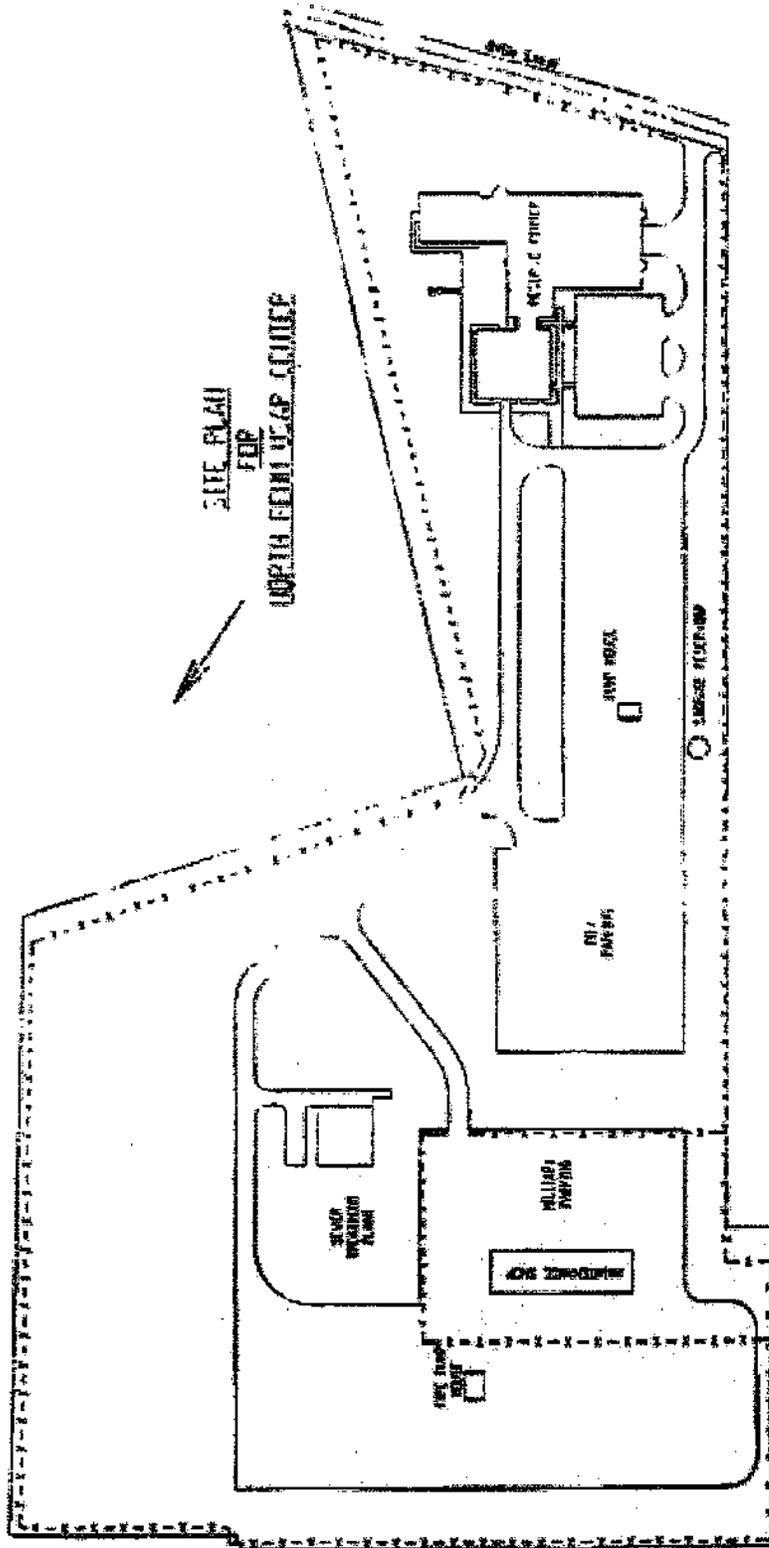
reflect item validity and to adjust the estimated costs, resulting in a revised a total estimated cost of \$629,730. Additional new RPMA work estimated at \$6,100 was identified during the assessment. All real property maintenance information is contained in Enclosure C.

8. Arms Vault Certification: The center's arms vault was inspected and re-certified IAW AR 190-11, which requires such action be conducted by appropriate engineer personnel every 5 years. The DA Form 4604-R should be posted in the arms vault and be reviewed during physical security surveys. The arms vault inspection checklist and DA Form 4604-R are contained in Enclosure D.
9. EMAAR/Space Utilization: Details relating to the utilization of space at the center are contained in Enclosure E.
10. Mr. Nick Taylor, Ms. Mary Ann Hamilton, Mr. Noel Costa, Mr. Kim Kegeriese, and Ms. Rebecca Sandy were extremely helpful and cooperated in assisting the team with this visit. Their dedication and professionalism greatly simplified our team's ability to accomplish the mission.

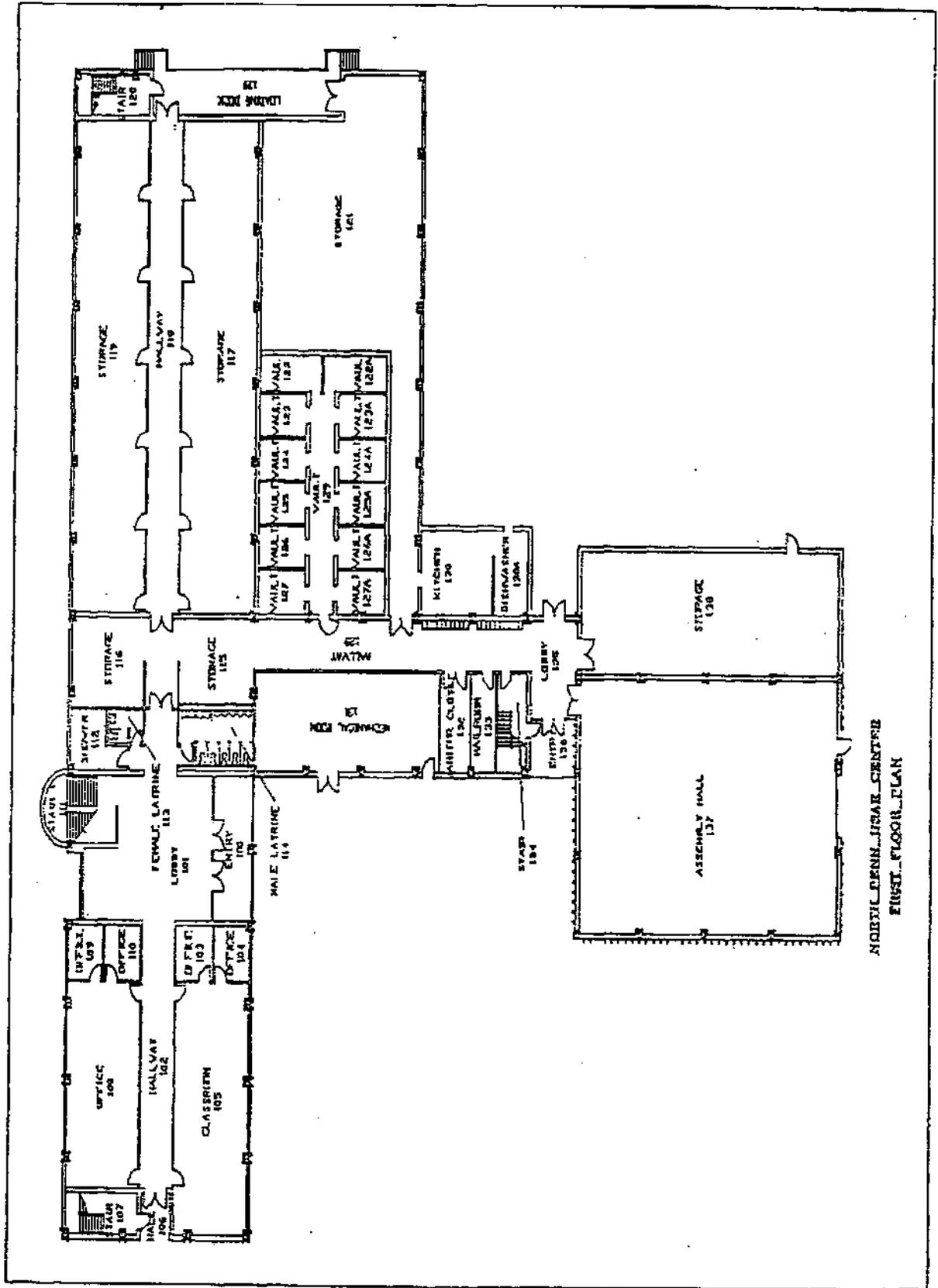


DOUGLAS F. GARNER, PE
LTC, EN, USAR
Team Leader

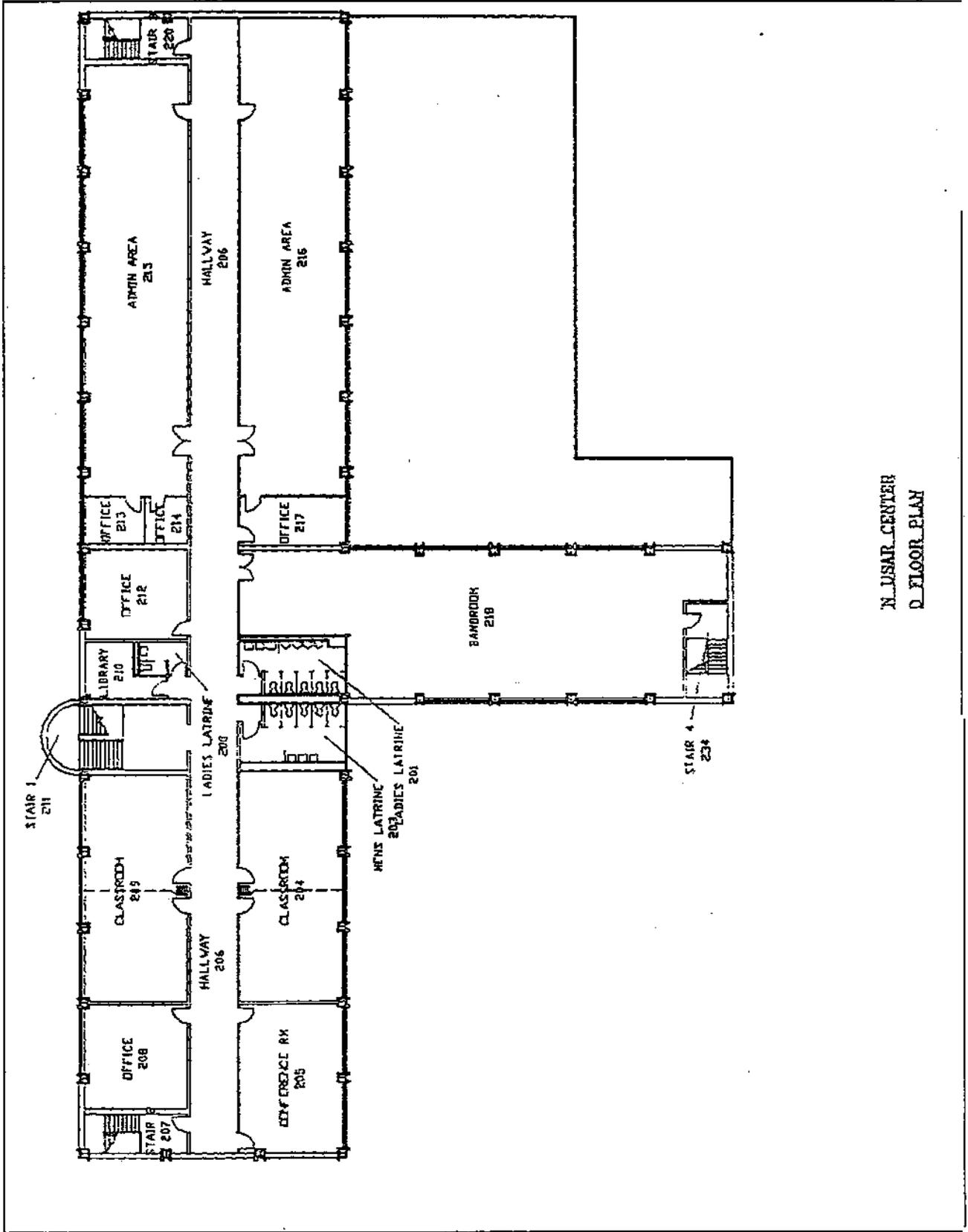
SECTION 4.C - SITE MAP



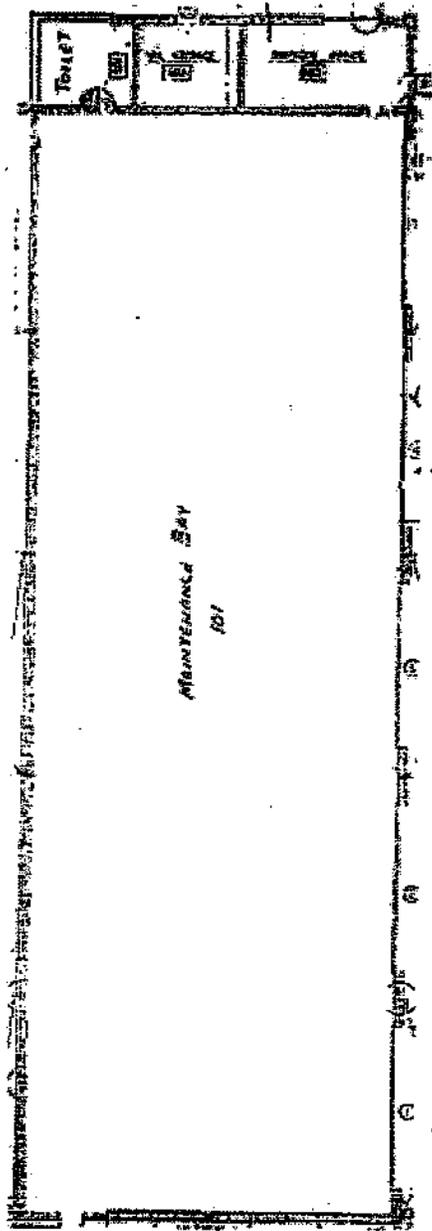
SECTION 4.D - BUILDING FLOOR PLANS



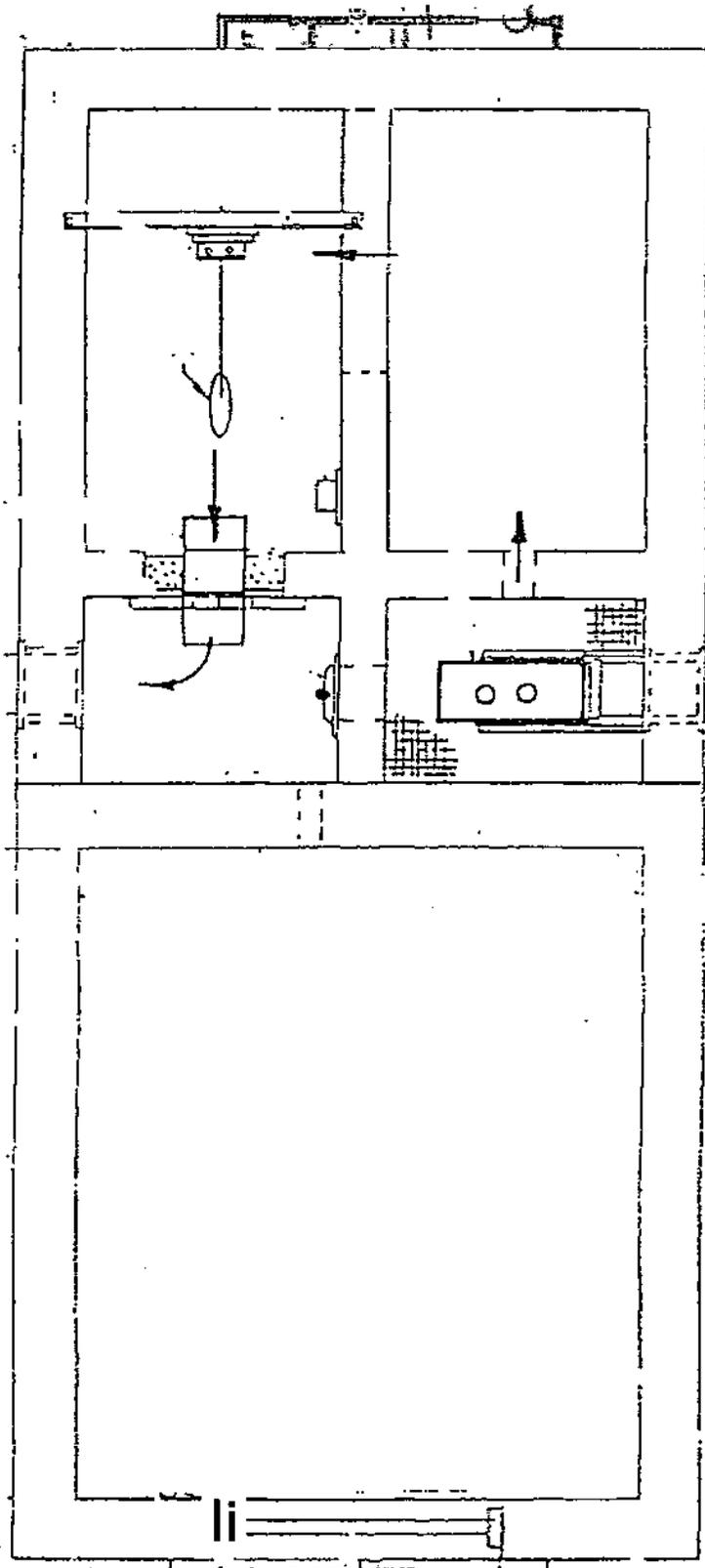
NORTH PENN. HIGH CENTER
FIRST FLOOR PLAN



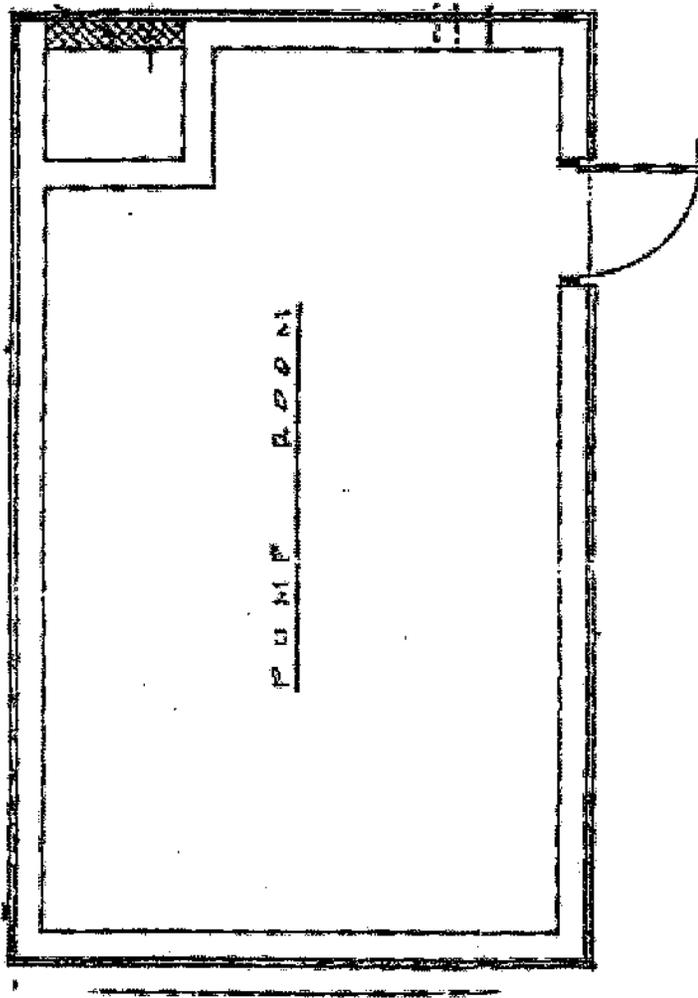
N_USAR_CENTER
D_FLOOR_PLAN

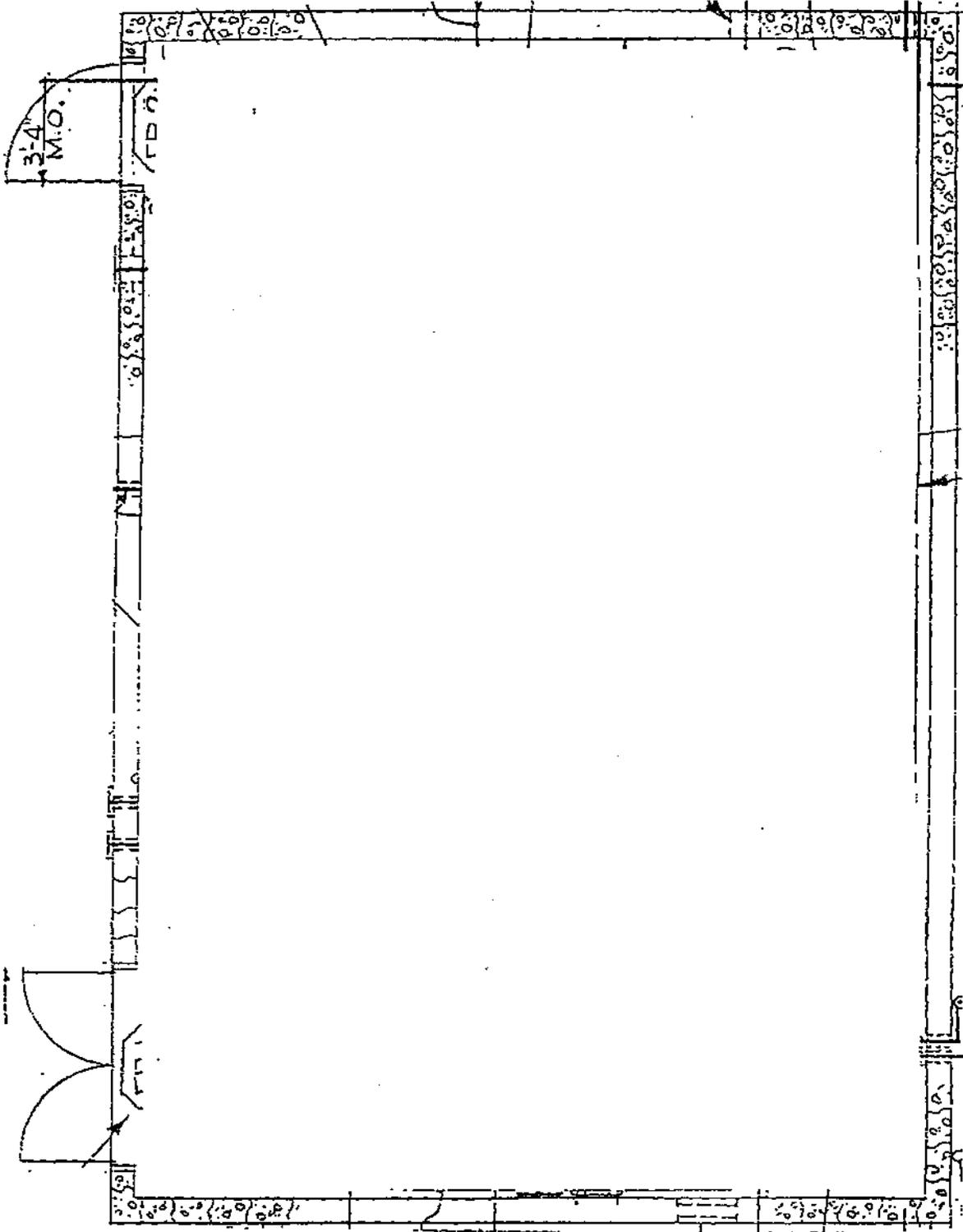


OMS



CHLORINE HOUSE & CONTACT TANK





FIRE PROTECTION PUMP HOUSE

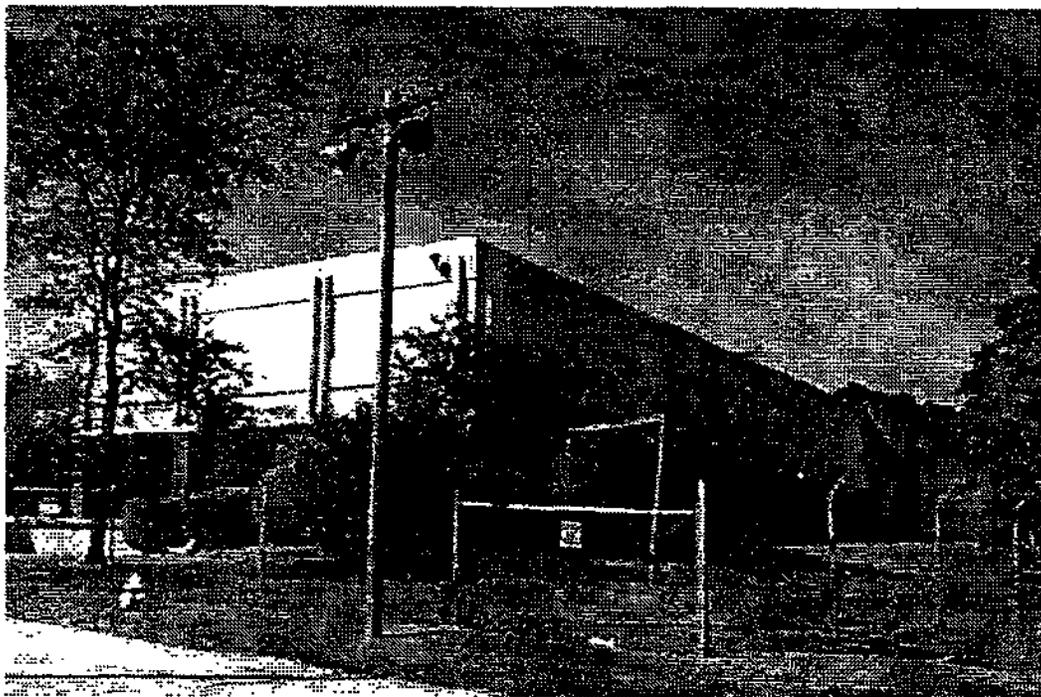


Photo 1: West corner (front) of North Penn USAR Center



Photo 2: North corner of USAR Center

Public Outreach Workshop and Tour Information

Public Outreach Workshop: Thursday, June 29, 2006
7:30 p.m.
Worcester Township Community Hall
1031 Valley Forge Road
Fairview Village, PA

Facilities Tour: September 2006 – date and time to be announced

DEPARTMENT OF THE ARMY

**UNITED STATES ARMY FACILITY ENGINEER GROUP
416th ENGINEER COMMAND
10 South 100 Frontage Road
Darien, IL 60561-1780**



REAL PROPERTY MAINTENANCE ACTIVITIES

For

North Penn USAR Center

Worcester, Pennsylvania Facility I.D. No. PA139

Date of Visit: 31 May - 1 June 2000

PREPARED BY:

**FACILITY ENGINEER GROUP (416th ENCOM)
FACILITY ENGINEER CENTER - NORTHEAST**

**FORT INDIANTOWN GAP
FACILITY ENGINEERING TEAM
Annville, Pennsylvania**

SECTION 1: EXECUTIVE SUMMARY

INSTALLATION NAME: North Penn USAR Center

INSTALLATION NUMBER: PA139

DATE: 31 May - 1 June 2000

The Ft. Indiantown Gap Facility Engineer Team (Team) conducted an Engineering and Environmental Facility Assessment (E2FA) for the North Penn USAR Center on 31 MAY - 1 JUN 2000. The facility was constructed in 1974 on a former Nike Missile site, which included three capped subsurface missile silos. The center consists of five buildings; the main USAR center (39,187 SF), the Organizational Maintenance Shop (OMS) (6,909 SF), the domestic water pump house (262 SF), the waste water treatment building (42 SF), and the fire pump house (565 SF). The buildings are fully utilized along with the MEP and the POV parking areas. Security fencing surrounds the entire complex. The surrounding area consists of mostly high-end residential homes and some farmland. The facility is located adjacent to a multilane thoroughfare.

The USAR Center is located on 17 acres of land in Worcester, PA. The main building was constructed in 1974 and is two-story pre-cast concrete and structural steel frame, slab on grade. The main building has no basement, except for the mechanical room, which is below grade. The main building is a "T" shaped configuration. The 5-bay OMS is brick and steel construction of approximately 46 feet by 145 feet.

Since its construction in 1974, there have been several system upgrades/replacements, including; new roofing on all buildings on 8 DEC 95 (10- year warranty), on-site sewer and water line replacement in 1999, domestic well, pump, and associated equipment in 1999, conversion from oil to natural gas fuel and heating equipment in 1995. The main building heating system is dual fuel #2 fuel oil and natural gas, with gas as the primary fuel. Infrared gas heaters augment this heating system in the drill hall. The OMS is heated with gas-fired infrared heaters (2) and a single unit heater.

4. During the visit, a significant facility issue involving the potable water supply system was noted, warranting urgent action. The 99th RSC was notified of this in a memo dated 9 JUL 2000, a copy of which is contained in Enclosure C. There is a potentially significant safety issue arising from the fact that a new on-site water well and ancillary equipment was recently installed and placed into service without any water quality monitoring. Center personnel currently cook in and drink water provided by this system. The system has no water treatment system, such as chlorine, and neither initial nor periodic water quality monitoring has been performed. Mr. Nick Taylor, Facility Manager, was advised to post all consumption points advising center personnel to not drink the water, arrange for bottled water, and to arrange for the necessary testing.
5. Real Property Maintenance: The main building is constructed of concrete masonry unit (CMU) interior walls covered by pre-fabricated concrete panels and brick veneer exterior walls with a concrete floor. The OMS consists of CMU interior walls and brick veneer exterior walls with a concrete floor. The overall condition of the facility is fair, as there are numerous items that are in need of maintenance and repair action. It was obvious that some of these issues have been present for some time. For example, many ceiling tiles were stained, some dating back to 1996, when leaking unit heaters were replaced. According to center personnel, many of the tiles were also stained with animal waste from rodents and/or birds, which had previously entered the building (over the ceilings) through

open wall penetrations. Another example involves damage to the perimeter fencing (see photo #6, Section 5) from a fallen tree, which reportedly occurred in 1994 or 1995. This damage compromises the physical security of the facility and could be easily corrected by a contractor funded by the use of the Impac credit card.

The team observed the lack of effective contractor oversight relating to three (3) separate utility construction efforts to replace the natural gas, water, and sewer lines. Improper asphalt patching of associated trenching several years ago has resulted in damage to adjacent asphalt during snow removal operations. Work continues (dumping of topsoil) on the sewer line replacement project without any coordination with on-site personnel. A bend in the sewer line was installed without a manhole. No drawings were available to indicate whether or not this was the design, but common practice for all pipe direction changes is to install a manhole at all such changes.

A contractor visits the site daily to perform maintenance and monitoring of the on-site septic treatment system, yet there is no effort to monitor the on-site domestic water system. Facility personnel were not familiar with the operation of any of these systems to provide effective oversight.

6. During the site visit, the assessment team reviewed the RISER report, which contained previously submitted work orders. This RISER report has been annotated to reflect item validity and to adjust the estimated costs, resulting in a revised total cost estimate cost of \$629,730. Additional new RPMA work estimated at \$6,100 was identified during the assessment.

DOUGLAS F. GARNER, PE
LTC, EN, USAR
Team Leader

Component Inspection Summary: PA139

Item No.	Facility Component	Cond Code	Date of Component Installation	Date of Last Maint/Repair	Est'd Remain Life Years	Projected FY of Repair	Cost of Work Estimate	Work Order Number
1	Ceilings	CI	1974	1995	5			
2	Walls	CI	1974	1996	20			
3	Doors	CI	1974	1992	20			
4	Floors	CI	1974	1995	10			
5	Windows	C2	1974		5			
6	Stairs	CI	1974		25			
7	Latrines	CI	1974		5			
8	Kitchen	C2	1974		5			
9	Electrical	C2	1974	1993	20			
10	Plumbing	CI	1974	1980	10			
11	Heating Sys	CI	1995		25			
12	Cooling Sys	CI	1995		25			
13	Site/Grounds	CI	1974		20			
14	Bldg Exterior	CI	1974		30			
15	Roof	CI	1974	1995	25			
16	Fencing	C2	1974		5			
17	Pavement	C2	1974	Various	2			
18	Security Sys	N/A	None					
19	Other	NA		NA				
Total Cost^{Uy}								::>

- CI Item is generally in good condition and requires only routine maintenance and repair.
- C2 Item shows signs of partial failure of system components and needs maintenance, repair, or replacement
- C3 Item shows signs of extensive or complete failure of system components or system and needs immediate maintenance, repair, or replacement

ENCLOSURE E

PA139

LEGENDS

EMAAR FACILITY DATA USE CODE LEGEND

FROM DA FORM 5034-R, JAN 94

REFERENCE AR 140 483

I. TRAINING BUILDING		II. MAINTENANCE SHOPS	
A. ADMINISTRATIVE AREAS		A. ORGANITIONAL MAINTENANCE	
(1) FULL TIME		(1) SHOP OFFICE	
(2) UNIT EXCLUSIVE		(2) UNISEX TOILET	
(3) UNIT COMMON		(3) TOOL & PARTS ROOM	
(4) RETENTION		(4) STORAGE ROOM	
(5) ADMINISTRATIVE SUPPORT		(5) BATTERY ROOM	
(a) GENERAL		(6) FLAMMABLE STORAGE	
(b) RCAS		(7) CONTROLLED WASTE STORAGE	
(6) LOBBY		(8)	
B. ASSEMBLY AREA		(9)	
(1) ASSEMBLY AREAS		B. AREA MAINTENANCE SUPPORT	
(2) CHAIR AND TABLE STORAGE		(1) SHOP OFFICE	
C. KITCHEN - STD DESIGN		(2) MEN'S TOILET	
D. WEAPONS AREA		(3) WOMEN'S TOILET	
(1) VAULT		(4) LOCKER ROOM	
(2) ARMORER		(5) CLASSROOM/BREAK AREA	
E. EDUCATIONAL AREAS		(6) TOOL ROOM	
(1) CLASSROOMS		(7) SUPPLY ROOM	
(2) LIBRARY READING ROOM		(8) BATTERY ROOM	
(3) LIBRARY STORAGE		(9) COMMO/ELECTRONICS SHOP	
(4) LEARNING CENTER		(10) INSTRUMENT REPAIR	
(5) TRAINING AIDS STORAGE		(11) SMALL ARMS REPAIR	
(6) COMSEC TRAINING		(12) SMALL ARMS VAULT	
(7) COMSEC STORAGE		(13) FLAMMABLE STORAGE	
(8) USARF INSTRUCTOR ROOM		(14) CONTROLLED WASTE STORAGE	
(9) USARF PUBLICATIONS STORAGE		(15)	
F. STORAGE AREAS		(16)	
(1) UNIT/INDIVIDUAL		(17)	
(2) STAGING AREA		C. JOINT MAINT AREAS (OMS/AMSA)	
(3) SUPPLY OFFICE		(1) WORK BAYS	
(4) JANITORIAL STORAGE		(2) MECHANICAL CUSTODIAL	
(5) FLAMMABLE STORAGE		(3)	
(6) CONTROLLED WASTE			
(7) FACILITY MAINTENANCE		III. UNHEATED STORAGE¹	
G. SPECIAL TRAINING AREAS		A. UNIT/INDIVIDUAL STORAGE	
(1) RIFLE RANGE		B. STAGING AREA	
(2) PHOTO LAB			
(3) BAND ROOM		IV. SUPPORTING FACILITIES¹	
(4) MEDICAL SECTION		A. PRIVATELY-OWNED VEHICLE	
(5) PHYSICAL EXAM WING		(1) PARKING - CENTER (SY)	
(6) SCIF		(2) PARKING - AMSA (SY)	
(7) SOIL TESTING LAB		B. MILITARY EQUIPMENT PARK	
(6) G. O. CONFERENCE		(1) OMS (SY)	
(9) DRAFTING ROOM		(2) AMSA (SY)	
(10) PHYSICAL READINESS		C. WASH PLATFORMS	
(11) WWNCCS		(1) OMS (EA)	
(12) AMSA ELECTRONICS SHOP		(2) AMSA (EA)	
H. SUPPORT AREA		D. COVERED STORAGE (SF)	
(1) MEN'S TOILETS & SHOWERS		E. MEP FENCING (LF)	
(2) WOMEN'S TOILETS & SHOWERS		F. MEP LIGHTING (EA)	
(3) UNISEX HANDICAP TOILET		G. ACCESS ROADS (SY)	
(4) LOCKER ROOM			
(5) VENDING ALCOVE		HVAC CODE LEGEND	
(6) BREAK AREA		H: Room Heated Only	
(7) MECHANICAL		A: Room Air-Conditioned Only	
(8) ELECTRICAL		HA: Room Heated & Air-Conditioned	
(9) TELEPHONE		U: Room is Unconditioned	

ENCLOSURE E

PA139

FACILITY DATA SUMMARY			DATE: 31 MAY 00
NORTH PENN USAR CENTER			FACILITY: PA139 LOCATION: Worcester, PA
	Existing Area (nsf)	Area Subtotals (nsf)	Total (nsf)
I. TRAINING BUILDING			Z8Q33
A. ADMINISTRATIVE AREAS		11245	
(1) FULL TIME	767		
(2) UNIT EXCLUSIVE	6,963		
(3) UNIT COMMON	3,515		
(4) RETENTION			
(5) ADMINISTRATIVE SUPPORT			
(a) GENERAL			
(b) RCAS			
(6) LOBBY			
B. ASSEMBLY AREA		0	
(1) ASSEMBLY A R S			
(2) CHAIR AND TABLE STORAGE			
C. KITCHEN - STD DESIGN	456	486	
D. WEAPONS AREA		1,578	
(1) VAULT	1,242		
(2) ARMORER	336		
E. EDUCATIONAL AREAS		2,404	
(1) CLASSROOMS	2,404		
(2) LIBRARY READING ROOM			
(3) LIBRARY STORAGE			
(4) LEARNING CENTER			
(5) TRAINING AIDS STORAGE			
(6) COMSEC TRAINING			
(7) COMSEC STORAGE			
(8) USARF INSTRUCTOR CLASSROOM			
(9) USARF PUBLICATIONS STORAGE			
F. STORAGE AREAS		10,368	
(1) UNIT/INDIVIDUALEQUIPMENT	9,234		
(2) STAGING AREA			
(3) SUPPLY OFFICE			
(4) JANITORIAL STORAGE	1,132		
(5) FLAMMABLE STORAGE			
(6) CONTROLLED WASTE STORAGE			
(7) FACILITY MAINTENANCE			
G. SPECIAL TRAINING AREAS		159	
(1) RIFLE NGE			
(2) PHOTO LAB			
(3) BAND ROOM	159		
(4) MEDICAL SECTION AREA			
(5) PHYSICAL EXAM WING			
(6) SCIF			
(7) SOILS TESTING LAB			
(8) G.O. CONFERENCE ROOM			
(9) DRAFTING ROOM			
(10) PHYSICAL READINESS AREA			
(11) AGCCS			

ENCLOSURE E

PA139

FACILITY DATA SUMMARY			PATE: 31 MAY 00 -
NORTH PENN USAR CENTER			FACILITY: PA139
			LOCATION: Worcester, PA
	Existing Area (nsf)	Area Subtotals (nsf)	Total (nsf)
(12) AMSA ELECTRONICS SHOP			
(13)			
	Existing Area (nsf)	Area Subtotals (nsf)	Total (nsf)
H. SUPPORT AREA		1,869	
(1) MEN'S TOILETS & SHOWERS	601		
(2) WOMEN'S TOILETS & SHOWERS	321		
(3) UNISEX HANDICAP TOILET			
(4) LOCKER ROOM			
(5) VENDING ALCOVE			
(6) BREAK AREA			
(7) MECHANICAUCUSTODIAL	946		
(8) ELECTRICAL			
(9) TELEPHONE			
TOTAL CENTER NET TRAINING AREA			28,033
CIRCULATION ALLOWANCE (ACTUAL)			7,903
STRUCTURAL ALLOWANCE			3,251
TOTAL CENTER NET TRAINING AREA			28,033
OUTGRANTED AREA			
TOTAL CENTER GROSS AREA			47,296
II. MAINTENANCE SHOPS (AMSA, BMA, OMS)			5,957
A. MAINTENANCE SHOP (BMA/OMS)		369	
(1) SHOP OFFICE	196		
(2) UNISEX TOILET	53		
(3) TOOL & PARTS ROOM			
(4) STORAGE ROOM	120		
(5) BATTERY ROOM			
(6) FLAMMABLE STORAGE			
(7) CONTROLLED WASTE STORAGE			
(8) HAZARDOUS MATERIAL STRG.			
(9)			
B. AREA MAINTENANCE SUPPORT		0	
(1) SHOP OFFICE			
(2) MEN'S TOILET			
(3) WOMEN'S TOILET			
(4) LOCKER ROOM			
(5) CLASSROOM/BREAK AREA			
(6) TOOL ROOM			
(7) SUPPLY ROOM			
(8) BATTERY ROOM			
(9) COMMOIELECTRONICS SHOP			
(10) INSTRUMENT REPAIR			
(11) SMALL ARMS REPAIR			
(12) SMALL ARMS VAULT			
(13) FLAMMABLE STORAGE			
(14) CONTROLLED WASTE STORAGE			
(15)			

ENCLOSURE E

PA139

FACILITY DATA SUMMARY			DATE: 31 MAY00
NORTH PENN USAR CENTER			FACILITY: PA139
			LOCATION: Worcester, PA
	Existing Area (nsf)	Area Subtotals (nsf)	Total (nsf)
C. JOINT MAINT AREAS (AMSABMA/OMS)		5,588	
(1) WORK BAYS	5,588		
(2) MECHANICAL/CUSTODIAL			
(3)			
TOTAL SHOP NET AREA			5,957
STRUCTURAL ALLOWANCE			952
TOTAL SHOP GROSS AREA			6,909
OUTGRANTED AREA			
TOTAL SHOP AVAILABLE GROSS AREA			6,909
	Existing Area (nsf)	Area Subtotals (nsf)	Total (nsf)
III. OUTBUILDINGS		0	0
TOTAL OUTBUILDING NET AREA			869
CIRCULATION ALLOWANCE (ACTUAL)			0
STRUCTUAL ALLOWANCE (ACTUAL)			331
TOTAL OUTBUILDING GROSS AREA			1,200
TOTAL UNHEATED STORAGE NET AREA			
STRUCTURAL ALLOWANCE			
TOTAL UNHEATED STORAGE GROSS AREA			
OUTGRANTED AREA			
TOTAL UNHEATED STORAGE AVAIL. GROSS AREA			
IV. SUPPORTING FACILITIES			
A. PRIVATELY-OWNED VEHICLE		0	0
(1) PARKING - CENTER (SY)			
(2) PARKING - AMSA/BMA/OMS (SY)			
B. MILITARY EQUIPMENT PARK		0	0
(1) AMSA (SY)			
(2) BMA (SY)			
(3) OMS (SY)			
C. WASH PLATFORMS		0	0
(1) AMSA(EA)			
(2) BMA (EA)			
(3) OMS (EA)		0	
D. COVERED STORAGE (SF)		0	0
E. MEP FENCING (LF)		0	0
F. MEP LIGHTING (EA)		0	0
G. ACCESS ROADS (SY)		1	
REMARKS:			
<p>1. Above paragraph numbers correspond with paragraph numbers contained on DA Form 5034-R (Project Documentation Space Allowance Worksheet).</p> <p>2. Refer to North Penn USAR Center Real Property/Square Footage Summary, PA139.</p> <p>3. Areas, both net square feet (NSF) & gross square feet (GSF), were derived from random sample measurements & drawings.</p>			

ILLUSTRATIVE LIST OF PERMISSIBLE PUBLIC BENEFIT CONVEYANCES**1. *For Educational and Public Health Purposes***

Property may be conveyed for school, classroom, or other educational use, or for use of the protection of public health, including research.

2. *For Public Airports*

Property may be conveyed that is essential, suitable, or desirable for the development, improvement, operation, or maintenance of a public airport, including property needed to develop sources of revenue from non-aviation businesses at a public airport.

3. *For Use as Historic Monuments*

Property may be conveyed for use as a historic monument if the property is in conformance with the recommendation of the Advisory Board on National Parks, Historic Sites, Buildings and Monuments.

4. *For Use as Public Parks or Recreation Areas*

Property may be conveyed for use as a public park or a recreation area.

5. *For Correctional Facility, Law Enforcement, or Emergency Management Response Purposes*

Property may be conveyed for correctional facility purposes, if the Attorney General has determined that the property is required for such purposes and has approved an appropriate program or project for the care or rehabilitation of criminal offenders; for law enforcement purposes, if the Attorney General has determined that the property is required for such purposes; and for emergency management response purposes, including fire and rescue services, if the Director of the Federal Emergency Management Agency has determined that the property is required for such purposes.

6. *For Port Facility Use*

Property that the Department of Transportation recommends as being needed for the development or operation of a port facility may be conveyed.

7. *Power Transmission Lines*

A surplus power transmission line or right-of-way may be conveyed.

PUBLIC BENEFIT TRANSFER SCREENING

Entities interested in obtaining property through a public benefit conveyance (PBC), other than a homeless assistance conveyance, are invited to contact the following federal agency offices to find out more about each agency's PBC program and to discuss with the agency the entity's potential for qualifying for a conveyance of property:

Parks and Recreation:

Wendy Ormont
National Center for Recreation & Conservation
Federal Lands to Parks Program
U.S. Department of the Interior
National Park Service
1849 C Street, NW
Washington, DC 20240
Telephone: 202-354-6915
E-mail: wendy_ormont@nps.gov

Education:

Peter Wieczorek
Director, Federal Real Property Group
U.S. Department of Education
33 Arch Street, Suite 1140
Boston, MA 02110
Telephone: 617-289-0172
E-Mail: peter.wieczorek@ed.gov

Public Health:

John Hicks
Chief, Space Management Branch
Division of Property Management/PSC
Department of Health & Human Services
Parklawn Building, Room 5B-41
5600 Fishers Lane
Rockville, MD 20857
Telephone: 301-443-2265
E-mail: rpb@psc.gov

Historic Monument:

Contact the Military Department (Disposal Agency)

Public Airport:

Contact the Regional Federal Aviation Administration
Point of Contact.

Visit:

www.faa.gov/about/office_org/headquarters_offices/ar/p/regional_offices/

to identify the appropriate regional office.

Corrections and Law Enforcement:

Janet Quist
Special Projects Manager
Bureau of Justice Assistance
Office of Justice Programs
U.S. Department of Justice
810 7th Street, NW, Room 4413
Washington, DC 20531
Telephone: 202-353-2392
E-mail: janet.quist@usdoj.gov

Self Help Housing:

Janet Golrick
Assistant Deputy-Assistant Secretary
Office of Multi-Family Housing
Department of Housing and Urban Development
451 7th Street, SW, Room 6110
Washington, DC 20410
Telephone: 202-708-2495
E-mail: janet_m.golrick@hud.gov

Emergency Management:

Bill (Cheri) A. Smith
Program Manager
Excess Federal Real Property Program
Facilities Management and Services Division
Federal Emergency Management Agency
500 C Street, SW, Room 505
Washington, D.C. 20472
Telephone: 202-646-3383
E-mail: bill.smith1@dhs.gov

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

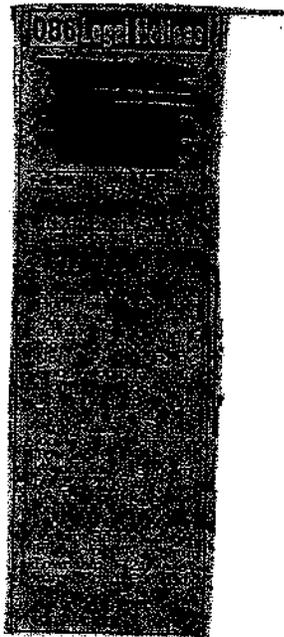
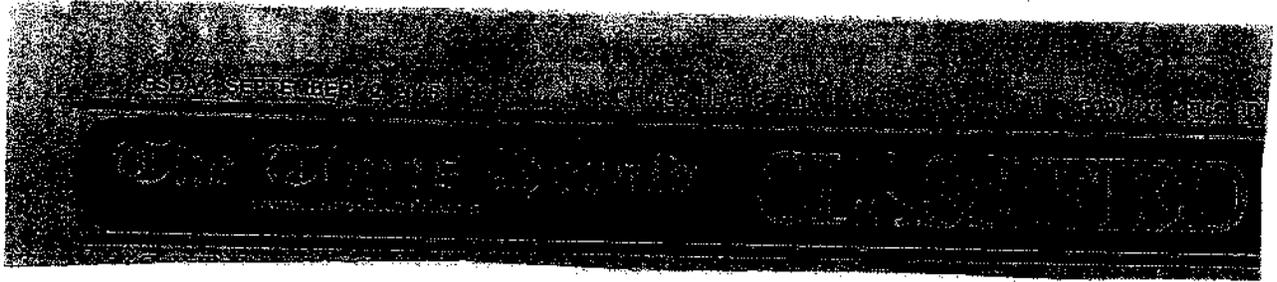
APPENDIX III

SITE TOUR

Newspaper advertisement of site tour

List of attendees at site tour

Newspaper Advertisement of Site Tour



AL

Appointed action and in districts

the state deadline to set up action and Norristown Area nine-member committees. School board chose Kristine Franz, Michael Hones, Les Javé Plager, Jeff Reiche and

Norristown's school board Philip Gardocki, LeRoy James Armetha Bugg, Patrick Owens and Helmuth Baerwald. 06, all school districts in commissions by Sept. 14. trying the effects of taxes on s.

d to make recommendations voters by the next May pri-generate revenue for proper-

ase the earned income tax; ish a new and local personal

missions must be trained and

ed to provide recommenda-boards about the ballot ques-a date that their panels were

in taillight juana bust

in-rear taillight spotted by a esday night led police to the ound of suspected marijuana-d a loaded handgun.

drug arrest we've had on a ce Chief E. Dale Mabry. th the broken taillight was ain Street at Montgomery h Natalini also observed the police said.

driving the vehicle was pt Road at 10:50 p.m. The : a driver's license. He was ite female, police said. bags containing suspected ir floor behind the driver's

BRIEFLY

Three rodeo performances set through weekend

For The Times Herald

WHITEMARSH — The Gary Barbera Liberty Pro-Rodeo sanctioned by the PRCA will celebrate with three big performances on Sept. 15 - 17 at the Lu Lu Shriners Temple, 5140 Butler Pike, Plymouth Meeting.

There is never a charge to the patient, parent or any third party for any service or medical treatment received at Shriners Hospitals. Shriners Hospitals accept and treat children without regard to race, religion or relationship to a Shriner.

Any child may be eligible for treatment at a Shriners Hospital if the child is under 18 and if, in the opinion of the hospital's chief of staff, the child has an orthopedic or burn condition that Shriners Hospitals can help.

Tickets purchased at the rodeo are as follows: \$14 for Adults, \$7 for Children under 12 years. Children under 6 are free.

Advance purchasers can save \$2 for adult admission and \$1 for children. If you have any questions or you need directions, call the LuLu Temple 610-828-9050.

Free site tour of U.S. Army Reserve Center

WORCESTER — The North Penn USARC Redevelopment Authority will host a site tour of the North Penn Memorial U.S. Army Reserve Center located in Worcester at 9 a.m., Sept. 27.

To register for the free tour, or for additional information, call Susan Caughlan at 610-584-5619 or write to Susan Caughlan, c/o Worcester Township, 1721 Valley Forge Road, P.O. Box 767, Worcester, PA, 19496.

The site visit for the community is a requirement of the Base Closure Community Redevelopment and Homeless Assistance Act of 1994.

Housing development proposal progressing

By KELLY DEVINE
Times Herald Staff

EAST NORRITON — The Williamstadt age-restricted housing development proposed for the northwest corner of Johnson Highway at DeKalb Pike is progressing in the township's development process.

The proposed neighborhood received zoning relief Tuesday night to allow eight feet, rather than the required 20 feet, exist between buildings and parking spaces in four locations.

The zoning relief was needed because the development was redesigned at the township's request, according to Philomeno & Salamone representative Pierce Anderson.

Anderson said that the township expressed a desire for the developer to remove access on Route 202 and widen drive-ways during preliminary approval. He said the required turning radii for emergency vehicles also drove the change.

An alternative access through St. Paul's Lutheran church onto Hancock Avenue is shown on the current plan for Williamstadt.

The church's parking lot was also rearranged as part of that arrangement, said Anderson.

List of Attendees at Site Tour

<u>NAME</u>	<u>ORGANIZATION</u>
Chase Kneeland	Worcester Township
Richard An Coccomiglio	American Legion Housing for Homeless Veterans
Carl Rotenberg	The Times Herald
Mary Jane Rees	Worcester Township resident
James Rees	Worcester Township resident
Linda Adkins	Animal Welfare Project
Fred Bookheimer	Worcester Township resident
Richard O'Brien	Keystone Consulting, Inc.
Joseph Nolan	Worcester Township
John Cornell	Worcester Township
Trevor Jackson	Methacton School District
Jeffrey Miller	Methacton School District
Steven DiFrancesco	Hunter Reed & Co.
Janet Denicola	Worcester Township Resident
Cosimo Denicola	Worcester Township Resident
Anita Menegaux	Habitat for Humanity
Brenda Egolf-Fox	Habitat for Humanity
Judith Memberg	Genesis Housing Corporation
Harold Miller	Department of the Army
Liz Gabor	Dept. of Defense, Office of Economic Adjustment

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

APPENDIX IV

HOMELESS ASSISTANCE SUBMISSION

Point-in-Time Homeless Population Count, 1-26-05

**Homeless Services Providers in the Montgomery County Continuum of Care to Which
Notices of the Availability of Surplus Property, Public Workshop, and Site Tour Were Sent**

CoC Homeless Population and Subpopulations

K: CoC Point-in-Time Homeless Population and Subpopulations Chart

Complete the following chart based on the most recent point-in-time count conducted. Part 1 and Part 2 must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. Include homeless Hurricane Katrina evacuees in Parts 1 and 2, and complete Part 3 if applicable. Part 3 may be completed using point-in-time information or may be estimated if no point-in-time count has been done since September 1, 2005. Completion of a point-in-time count of sheltered and unsheltered homeless persons during the last week in January 2006 is not required. The next required point-in-time count of sheltered and unsheltered homeless persons must be completed during the last week of January 2007. For further instructions for filling out this section, see the Instructions section.

Indicate date of last point-in-time count: 01/26/2005 (mm/dd/yyyy)

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):	98	54	0	152
1. Number of Persons in Families with Children:	295	173	0	468
2. Number of Single Individuals and Persons in Households without Children:	79	29	53	161
(Add Lines Numbered 1 & 2) Total Persons:	374	202	53	629

Part 2: Homeless Subpopulations	Sheltered	Unsheltered	Total
a. Chronically Homeless (For sheltered, list persons in emergency shelter only)	57	5	62
b. Severely Mentally Ill	89	*	89
c. Chronic Substance Abuse	47	*	47
d. Veterans	8	*	8
e. Persons with HIV/AIDS	1	*	1
f. Victims of Domestic Violence	49	*	49
g. Unaccompanied Youth (Under 18)	0	*	0

If applicable, complete the following section to the extent that the information is available. Be sure to indicate the source of the information by checking the appropriate box.

Data Source: Point-in-time count OR Estimate

Part 3: Hurricane Katrina Evacuees	Sheltered	Unsheltered	Total
Total number of Katrina evacuees			
Of this total, enter the number of evacuees homeless prior to Katrina			

*Optional for Unsheltered CoC-K

Homeless Services Providers in the Montgomery County Continuum of Care to Which Notices of the Availability of Surplus Property, Public Workshop, and Site Tour Were Sent

Big Brothers/Big Sisters of Montgomery Co.	Borough of Norristown
Bridge of Hope, BuxMont	Bryn Mawr College
Central Montgomery MH/MR	Cluster Outreach Center
Community Cupboard	Community Housing Services
Community Lenders CDC	Eagleville Hospital
Fair Housing Council of Montgomery Co.	Family Services of Montgomery Co.
Family OB/GYN Center at Montgomery Hospital	Forteniters
Freedom Valley Disability Center	Genesis Housing Corporation
Goodwill Employment Services	Habitat for Humanity
Indian Valley Hospitality Center	Indian Valley Opportunity Center
Institute for Community Living	Interagency Council of Norristown
Interfaith Community Services	Interfaith Hospitality Network
Interfaith Housing Alliance	JAE Enterprises, Inc.
Lamb Foundation	Laurel House
Mental Health Association of Southeastern PA	Montgomery Co. Foundation
Montgomery Co. Community Action Development Comm.	Montgomery Co. Housing Authority
Montgomery Co. Emergency Service, Inc.	Montgomery Co. Intermediate Unit
Montgomery County Legal Aid	Nehemiah's Way
New Options, Montgomery Co. Community College	Norristown Hospitality Center
Norristown Ministries Hospitality Center	North Hills Health Center
Norristown Initiative & Collaborative Board	Northwestern Human Services
One Night at a Time	The Open Line
Pennsylvania Institute for Community Living	Regional Housing Legal Services
Salvation Army of Norristown	Salvation Army – Pottstown
Shelter Liaison/Hedwig House	Women's Resource Center
Willow Grove Community Development Corp.	Young Women of Carver

Montgomery County Dept. Of Economic and Workforce
Montgomery County Dept. of Housing and Community Development
Montgomery County Dept. of Veteran Affairs
Montgomery County Office of Aging & Adult Services
Montgomery County Office of Children & Youth
Montgomery County Office of Juvenile Probation
Montgomery County Office of Mental Health
Montgomery County Redevelopment Authority

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

APPENDIX V

OUTREACH TO PUBLIC BENEFIT ORGANIZATIONS

Notice Posted on Worcester Township Website

Article in Worcester Township Newsletter

Letter Mailed to Residents Living Near Army Reserve Base

Letters Mailed to Community Organizations in Worcester Township

Notice Posted on Worcester Township Website

North Penn Army Base Strategic Planning Meetings

The township has begun the process of planning for the reuse of the North Penn Army Reserve base on Berks Road. The base is scheduled to be closed in the next several years and will be turned over to a new owner. In 2006, the township formed the North Penn Local Redevelopment Authority (LRA) to plan for the eventual reuse of the 17-acre site.

In 2007, the LRA will hold a series of public meetings to discuss the community's goals for the property. The township will be exploring the possibility of acquiring the site, at no cost, for open space. Several proposals for reuse have also been made by other organizations.

At each meeting, residents will have the opportunity to offer comments and ask questions. Residents who cannot attend a meeting are encouraged to send written comments to the township office in advance of the meeting. The address is Worcester Township, c/o Susan Caughlan, Project Coordinator, P.O. Box 767, Worcester, PA 19490. Comments may also be emailed to Susan at sgc@dca.net.

The meeting schedule is as follows:

- Wednesday, February 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. The LRA will discuss community goals and objectives for this site.
- Wednesday, March 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. Methacton School District will present its proposal to use a portion of the site.
- Wednesday, April 18, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. The LRA will discuss the proposals for reuse by the Animal Welfare Project, Methacton Community Theater, and Methacton School District.

North Penn Army Base Strategic Planning Meetings

The township has begun the process of planning for the reuse of the North Penn Army Reserve base on Berks Road. The base is scheduled to be closed in the next several years and will be turned over to a new owner. In 2006, the township formed the North Penn Local Redevelopment Authority (LRA) to plan for the eventual reuse of the 17-acre site.

This spring, the LRA is holding a series of public meetings to discuss the community's goals for the property. The township will be exploring the possibility of acquiring the site, at no cost, for open space. Several proposals for reuse have also been made by other organizations. At the first meeting, to be held during the Board of Supervisors' monthly public meeting on February 21, the community's goals and objectives for this site are to be discussed.

At each meeting, residents will have the opportunity to offer comments and ask questions. Residents who cannot attend a meeting may send written comments to the township office. The address

is Worcester Township, c/o Susan Coughlin, Project Coordinator, P.O. Box 707, Worcester, PA 19490. Comments may also be emailed to sp@lra.net.

The meeting schedule is as follows:

Wednesday, March 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall, Methacton School District will present its proposal to use a portion of the site.

Wednesday, April 18, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. The LRA will discuss the proposals for reuse by the Animal Welfare Project, Methacton Community Theater, and Methacton School District.

ERECTED INTO A TOWNSHIP IN 1733

TOWNSHIP OF WORCESTER

AT THE CENTER POINT OF MONTGOMERY COUNTY

PENNSYLVANIA

Board of Supervisors

JOHN R. HARRIS, CHAIRMAN
CHASE E. KNEELAND, VICE CHAIRMAN
ARTHUR C. BUSTARD, SECRETARY

1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

January 29, 2007

Re: North Penn U.S. Army Reserve Base

Dear Worcester Resident:

The township has begun the process of planning for the reuse of the North Penn Army Reserve base, located at 1625 Berks Road. The base is scheduled to be closed in the next several years and will be turned over to a new owner. In 2006, the township formed the North Penn Local Redevelopment Authority (LRA) to plan for the eventual reuse of the 17-acre site.

In the next few months, the LRA will hold a series of public meetings to discuss the township's goals for the property and the proposals for reuse which have been made by several organizations. At each meeting, residents will have the opportunity to offer comments and ask questions.

You are receiving this letter because you own real property located in the area of the Army base. All township residents are invited to attend the public meetings and participate in the discussions. If you are unable to attend meetings, written comments can be sent to the Project Coordinator at the address or email at the end of this letter.

The meeting schedule is as follows:

- Wednesday, February 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall, 1031 Valley Forge Road, Fairview Village
The LRA will discuss community goals and objectives for this site.
- Wednesday, March 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall, 1031 Valley Forge Road, Fairview Village
Methacton School District will present its proposal to use a portion of the site.
- Wednesday, April 18, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall, 1031 Valley Forge Road, Fairview Village
The LRA will discuss the proposals for reuse by the Animal Welfare Project, Methacton Community Theater, and Methacton School District.

Please contact the Project Coordinator for additional information regarding the site or the planning process.

WORCESTER TOWNSHIP BOARD OF SUPERVISORS

Project Coordinator Contact Information: Susan Caughlan, Project Coordinator
c/o Worcester Township
1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

610-584-5619
sgc@dca.net

(610) 584-1410

www.worcestertwp.com
E-mail: worcester@worcestertwp.com

Fax: (610) 584-8901

**NORTH PENN U.S. ARMY RESERVE CENTER REDEVELOPMENT AUTHORITY
Worcester, Pennsylvania**

Michelle Romano, President
Farmers' Union Horse Company
P.O. Box 162
Fairview Village, PA 19409

January 16, 2007

Re: North Penn U.S. Army Reserve Base

Dear Michele:

The township has begun the process of planning for the reuse of the North Penn Army Reserve base on Berks Road. The base is scheduled to be closed in the next several years and will be turned over to a new owner. In 2006, the township formed the North Penn Local Redevelopment Authority (LRA) to plan for the eventual reuse of the 17-acre site.

In the next few months, the LRA will hold a series of public meetings to discuss the township's goals for the property and the proposals for reuse which have been made by several organizations. At each meeting, residents will have the opportunity to offer comments and ask questions.

We are also inviting organizations within the township to attend these meetings and to submit your comments to the LRA.

If you wish to submit written comments, they can be sent to the township office. The address is:

Worcester Township, c/o Susan Caughlan, Project Coordinator
P.O. Box 767, Worcester, PA 19490

Comments may also be emailed to me at sgc@dca.net.

The meeting schedule is as follows:

- Wednesday, February 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. The LRA will discuss community goals and objectives for this site.
- Wednesday, March 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. Methacton School District will present its proposal to use a portion of the site.
- Wednesday, April 18, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. The LRA will discuss the proposals for reuse by the Animal Welfare Project, Methacton Community Theater, and Methacton School District.

Please let me know if you would like additional information regarding the site and the planning process.

Best regards,

Susan G. Caughlan
Administrative Coordinator, North Penn US Army Reserve LRA
610-584-5619
sgc@dca.net

c/o Worcester Township
1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

**NORTH PENN U.S. ARMY RESERVE CENTER REDEVELOPMENT AUTHORITY
Worcester, Pennsylvania**

Kim David, President
The Friends of Worcester
P.O. Box 545
Worcester, PA 19490

January 16, 2007

Re: North Penn U.S. Army Reserve Base

Dear Kim:

The township has begun the process of planning for the reuse of the North Penn Army Reserve base on Berks Road. The base is scheduled to be closed in the next several years and will be turned over to a new owner. In 2006, the township formed the North Penn Local Redevelopment Authority (LRA) to plan for the eventual reuse of the 17-acre site.

In the next few months, the LRA will hold a series of public meetings to discuss the township's goals for the property and the proposals for reuse which have been made by several organizations. At each meeting, residents will have the opportunity to offer comments and ask questions.

We are also inviting organizations within the township to attend these meetings and to submit your comments to the LRA. In particular, FOW may be interested in commenting on the township's possible acquisition of the site for open space.

If you wish to submit written comments, they can be sent to the township office. The address is:

Worcester Township, c/o Susan Caughlan, Project Coordinator
P.O. Box 767, Worcester, PA 19490.

Comments may also be emailed to me at sgc@dca.net.

The meeting schedule is as follows:

- Wednesday, February 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. The LRA will discuss community goals and objectives for this site.
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Please let me know if you would like additional information regarding the site and the planning process.

Best regards,

Susan G. Caughlan
Administrative Coordinator, North Penn US Army Reserve LRA
610-584-5619
sgc@dca.net

c/o Worcester Township
1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

**NORTH PENN U.S. ARMY RESERVE CENTER REDEVELOPMENT AUTHORITY
Worcester, Pennsylvania**

Oliver Smith, President
Worcester Historical Society
P.O. Box 112
Worcester, PA 19490

January 16, 2007

Re: North Penn U.S. Army Reserve Base

Dear Ollie:

The township has begun the process of planning for the reuse of the North Penn Army Reserve base on Berks Road. The base is scheduled to be closed in the next several years and will be turned over to a new owner. In 2006, the township formed the North Penn Local Redevelopment Authority (LRA) to plan for the eventual reuse of the 17-acre site.

In the next few months, the LRA will hold a series of public meetings to discuss the township's goals for the property and the proposals for reuse which have been made by several organizations. At each meeting, residents will have the opportunity to offer comments and ask questions.

We are also inviting organizations within the township to attend these meetings and to submit your comments to the LRA. In particular, the Society may be interested in pursuing the historic potential of the site because of its former use as a Nike missile base.

If you wish to submit written comments, they can be sent to the township office. The address is:

Worcester Township, c/o Susan Caughlan, Project Coordinator
P.O. Box 767, Worcester, PA 19490.

Comments may also be emailed to me at sgc@dca.net

The meeting schedule is as follows:

- Wednesday, February 21, during the Board of Supervisors' regular public meeting, 7:30 p.m. in Worcester Township Community Hall. The LRA will discuss community goals and objectives for this site.
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Please let me know if you would like additional information regarding the site and the planning process.

Best regards,

Susan G. Caughlan
Administrative Coordinator, North Penn US Army Reserve LRA
610-584-5619
sgc@dca.net

c/o Worcester Township
1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

APPENDIX VI

PUBLIC PLANNING MEETING

Letters Received from Community Organizations

Memorandum Submitted by Worcester Planning Commission

Minutes of February 21, 2007, Public Meeting

Comments from Residents Received Following Public Meeting of February 21, 2007

Farmers' Union Company for the Recovery of Stolen Horses and Detecting the Thieves

ORGANIZED A. D. 1833

Fairview Village, Montgomery County, Pennsylvania



February 21, 2007

Board of Supervisors
Township of Worcester
1721 Valley Forge Road
Worcester PA 19490

Gentlemen:

The Farmers' Union Horse Company strongly supports Worcester Township's vision for the Army Base to become open space for the benefit of all Township residents. It is an ideal parcel for walking and equestrian trails.

It would be particularly beneficial if the Cross Township Trail could be continued farther East to this property. There is plenty of parking to accommodate horse trailers. It would be wonderful if riders could park their trailers and conceivably ride to Evansburg Park.

It is becoming increasingly difficult to ride on the township's roads, as people used to do, creating more of a need for passive recreation sites like this one, where residents can walk, ride, and jog in safety.

We do hope to see this property become open space for public benefit.

Sincerely,

Michele Romano
President
1401 Hollow Road
Collegeville PA 19426

P.O. Box 545
Worcester, PA 19490



Phone: 610-584-1805
friendsofworcester.org

Worcester Township Board of Supervisors
1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

February 19, 2007

Re: North Penn Army Reserve Base

Dear John, Chase, and Art:

We are writing concerning the Army Reserve base on Berks Road, which will be closing in the next few years. The township has wisely chosen to become involved in the planning process, so that any inappropriate development can be avoided and this property can be reused for the benefit of the entire township.

We are aware of several proposals to reuse this property, including an animal rescue operation and a school bus depot. However, we support the option of acquiring the property at no cost for open space and passive recreation. The property is located in a very rural area of the township and is surrounded by active farmland and low-density residential population. It is across the street from one of the highest priority areas in the township for natural resource and scenic viewshed preservation – the Stony Creek headwaters area along Bean Road. Any intensive reuse of the property would be very inappropriate for this area.

This 18-acre property would be an excellent addition to the township's park system, to meet the needs of the residents of the southeastern portion of the township. It already has adequate parking facilities and a network of paved trails for walking, bicycling, jogging, and horseback riding. The large paved areas could easily accommodate several tennis courts and outdoor basketball courts, if these are needed in the future. The property is very close to the powerline corridor, which is designated in the Greenway Plan as a future township multi-use trail. This would provide off-road access for many township residents. The base is also close to Nike Park, which is a link in the cross-township hiking/bridle trail. Connecting the base to Nike Park with a trail along Potshop Road would allow the cross-township trail to be extended even further toward the eastern edge of the township.

We support the township's efforts to acquire this property for open space and parkland, so that Worcester can continue to retain its rural character and address the recreational needs of its residents.

Thank you for your consideration.

Sincerely,

R. Kimber David

ONCE IT'S GONE, IT'S GONE FOREVER!

Contributions to Friends of Worcester are tax deductible

MEMORANDUM

To: Worcester Township Board of Supervisors

cc: John Cornell, Township Manager
Joseph Nolen, Township Engineer
James Garrity, Township Solicitor
Matt Schelly, MCPC

From: Worcester Township Planning Commission **Pages:** 2

Re: North Penn U.S. Army Reserve Center
Base Redevelopment Planning

Date: February 20, 2007

As we understand it, the existing North Penn U.S. Army Reserve Center on Berks Road is being prepared for closure and the Township has assumed the role of the local redevelopment authority (LRA) to take the lead in planning the site's reuse or redevelopment.

At a recent Planning Commission Meeting, we were asked to provide the BOS with our recommendations on potential end uses which would be consistent with the Township's Comprehensive Plan and Open Space Plan. In order to recommend such specific end uses, we would need more information about the facility, its operations, and site conditions as well as time frame requirements for coming up with a viable plan. Furthermore, we would need more information about the legal options available under base closure procedures. To date, very limited information has been provided to the WPC, but we do understand that a Facility Assessment is being prepared by a private consultant and a closure report, including environmental assessment, is being prepared by the U.S. Army. Our assessment, therefore, is incomplete and limited to certain basic assumptions and is subject to modification based on new or more complete information.

In general, the WPC is very supportive of the site's redevelopment for a community use and recommend that every effort be made to exhaust all potential community uses, both single and multi-use options. We believe the reuse options are a function of a full understanding of the present facility assets and potential liabilities. The key assets appear to be:

- 47,000 +/- square feet of useable building space, in apparently good condition
- Over 180,000 square feet of paved parking
- On-site sewage treatment facility with capacity for 2,000 gpd
- On-site potable water with 50,000 gallon storage tank and public water available at street
- Presence of 3 underground Nike storage silos

Given these outstanding assets and the considerable cost of their removal, we recommend very serious consideration of a community-based adaptive re-use strategy as the first priority. A conceptual reuse plan we would support would include:

- Memorialization of the Nike site at the rear of the property with self-guided tour or other on-site interpretation
- Development of active recreational facilities in central, paved portion of the site for rehabilitation as basketball courts, tennis courts, or seasonal ice skating rink
- Use of some of the paved parking for future trail head parking to support potential expansion of trail network
- Exploration of adaptive reuse of the building for:
 - Community library
 - Elementary school/special needs school
 - Possible relocation of Variety Club
 - Possible satellite for Montgomery County Community College or other school

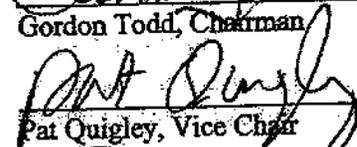
In addition, we strongly recommend the following:

- The scope of the facilities study should define the full costs of demolition, including subsoil contamination issues and potential remediation costs associated with demolition, such as asbestos removal, tank removal, etc.
- We should look closely at the option of purchasing the site for fair market value and how this is determined; site ownership may allow Township greater flexibility in subdivision and control of end uses
- All options should be clearly identified including costs, benefits and impacts to the Township
- Assessment of alternatives should include full Public involvement.

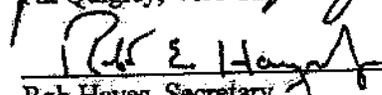
In closing, we appreciate the opportunity to be involved with an important redevelopment plan for the Township and fully support the redevelopment of the site for community-based use. We strongly urge the full evaluation of the existing building resource as an asset that should not be wasted without full consideration of alternative costs and benefits. The Planning Commission would like to remain involved in the redevelopment process as more information becomes available.



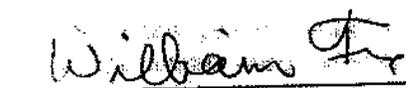
Gordon Todd, Chairman



Pat Quigley, Vice Chair



Rob Hayes, Secretary



William Fox, Member

WORCESTER TOWNSHIP
WORCESTER TOWNSHIP BOARD OF SUPERVISORS
WORCESTER TOWNSHIP COMMUNITY HALL
FAIRVIEW VILLAGE, PA
WEDNESDAY FEBRUARY 21, 2007 7:30 P.M.

LRA PUBLIC PRESENTATION BY SUSAN CAUGHLAN

8:30 P.M. John Harris gave history of the Army Reserve deactivation, stating that the Township has formed an LRA to study and recommend projects for the site.

Susan Caughlan, liaison for LRA, presented a slide show of the process using the following:

- Identify goals = Planning Elements.
- Comprehensive Plan goals
- Growth and Development goals
- Park land and recreation goals
- Open Space Plan
- Greenway Plan
- Current zoning and land uses

On March 21, 2007, the Methacton School District will make a public presentation for their proposed use.

George Hill asked if the township's actions will eliminate private sale of ground.

Jim Phillips asked what community groups are interested and if the Bookheimer family was contacted to see if they are interested. He also asked Susan Caughlan what qualification she had for handling the project and if she was getting paid.

James Rees, Merrybrook Road, representing the Historical Society, asserted that the society supports township efforts to preserve the Army property and its history.

Stocky Allen asked about hazards or contaminants on property and if an inspection of lead paint was conducted in the building constructed in 1978.

George Hill asked if Methacton School Board showed interest in the site.

Carol Allen inquired about the status of a under ground tunnel on site. Ms. Caughlan stated that there was no such tunnel as far as anyone was aware.

Jay Rees asked what does Nike stand for.

Dorothy McGrane, representing the Farmer Union Horse Company, said the Company strongly supports the township's efforts to preserve the property.

Kim David, representing the Friends of Worcester, said that FOW supports efforts for open space and park land on the site.

Gordon Todd, Chairman of Worcester Township Planning Commission, presented recommendation to LRA after a site tour and inspection of the building. The WTPC supports the

site for community development. A sewage treatment plant that serves DEC must be considered and environmental issues may be involved. He supports a park at this site to leave Heebner Park open and green. He indicated that the buildings are in good shape with sound concrete. The site would be well-suited for a community library, school, satellite college, state police barracks. A study to define costs of demolition or renovations is needed.

Leslie Margolis, 2600 Bean Road, inquired whether there are more opportunities for other groups to comment, now or in the future.

Public Presentation closed at 9:15 PM

GENERAL PUBLIC COMMENTS

Vince Galet, 1585 Broadview Lane, adds support to use of Army base facility as a park. He opposes a parking lot for buses.

Comments from Residents Received Following Public Meeting of February 21, 2007

From: "Kim David" <KimDavid@davidbrothers.com>
To: "Susan Caughlan" <sgc@dca.net>
Subject: Re: Army base
Date: Thu, 22 Feb 2007 07:33:27 -0500

Susan,

Great presentation! Very informative and some interesting pictures.

Kim

From: "Janice Hutt" <janice.hutt@theavocagroup.com>
To: <sgc@dca.net>
Cc: "Harold Hutt" <Harold@reliancehomehealth.com>
Subject: Worcester North Penn Army Reserve Base
Date: Sat, 24 Feb 2007 23:37:35 -0500

Dear Susan:

Last week my husband Harold and I attended your presentation during the Board of Supervisor's meeting. We appreciated the overview of the history of that site and the outline of ideas for the future use. We have been at 2720 Potshop, right across from the site, for 27 years. My husband's family lived on the corner of Berks and Potshop since the early 1900s.

There have been many changes to our township over these years and an enormous increase in the cut-through traffic on Potshop. We would not support any use of that site that would increase traffic. The entrance to the site is a very blind section of the road and cars go very fast on Berks. (As on many of our township's rural roads). Accidents at Bean and Potshop have been increasing each year. We would like to see open-space preserved there and hope that the LRA will consider this.

I would be willing to help in any way if a committee is formed to determine the future of that site.

Thank you for your very professional presentation.

Kind regards,

Janice Hutt
610-584-6650

From: RTaylorCraven@aol.com
Date: Thu, 22 Feb 2007 13:41:21 EST
X-ASG-Orig-Subj: Army Site Tour
Subject: Army Site Tour
To: sgc@dca.net

Sue,

We were very impressed with your presentation concerning the future redevelopment plans for the Army's Training Center last night at the Worcester Supervisors Meeting.

We would be very interested in touring the site. If there is a time when other concerned folks are planning to tour the site, we would like to be included on that tour.

Thank you very much for your time and consideration.

George H. Hill, Sr.
Randall Taylor-Craven

To: sgc@dca.net
Subject: Army Base Reuse
Date: Wed, 07 Mar 2007 19:29:53 -0500
From: angeubank@aol.com

Hi, Susan. I have a concern about using this Army Base for a park or some type of recreation facility. Isn't this a Superfund site? If you need help pulling info on this as a Superfund site, I can be of assistance. I was sure that you were aware and I'd like to see this as open space for the Township, however, not if it's a superfund site. Thanks. Angela Eubank

Date: Fri, 09 Mar 2007 16:31:00 -0500

Susan. Thanks so much for clearing this up for me. I was thinking of the property on Trooper Road. As usual, you are so on top of things. We are very fortunate to have someone like you keeping an eye on what goes on in the Township. Thanks for getting back to me and doing such a great job.

Angela Eubank

From: "Joan Harvey" <joanharvey@comcast.net>
Date: March 19, 2007

Ms. Susan G. Caughlan
Administrative Coordinator
North Penn US Army Reserve Center LRA
Worcester, PA

Dear Susan,

We live on Broadview Lane, Worcester Township, at the corner of Berks and Potshop Roads. Our home was completed this past November. We moved to Worcester because we wanted to live in a quiet community where we would not experience everyday the effects (noise, traffic, crime) of dense population and sprawl. I should point out that building and owning a home in Worcester is a very expensive commitment, but we had been told and read on Worcester's website that "preservation of

quality of life and open space is of paramount importance to the township," so we proceeded. In the process of buying our property and building our home, we have often wondered what would become of the property which is the former North Penn Army Reserve Base. We had heard that perhaps a park would be built there, possibly a nursing home or corporate facility, but most often we heard that the area would be dedicated as open space. We were very disturbed to learn recently that the Methacton School District is asking to relocate the district bus depot to the site.

As you know, Berks and Potshop Roads are popular cut-through roads to Routes 363 and 73, and Township Line Road. Traffic at the intersection of the two streets is very heavy throughout the day, especially in the mornings between the hours of 6:00 a.m. and 8:30 a.m. and from 3:00 in the afternoon through rush hour. The buses will definitely be leaving the depot and returning during these busiest of hours. The traffic volume will also be increased significantly by the bus drivers who have to drive to and from the depot twice each day to get to their buses.

Some of the buses will leave the depot by turning left onto Berks Road. This is an almost impossible feat. The cars moving along Berks Road in both directions go too fast for the buses to get out on Berks which is a narrow street with poor visibility to begin with. There have been many serious accidents at the intersection of Berks and Bean Roads because of speeding and poor visibility. Most of the buses will leave the depot by turning right onto Berks Road; then drive the short distance to the intersection of Berks and Potshop Roads. Berks Road is too narrow a road to accommodate buses coming and going in both directions, and the intersection at Potshop is very tight with poor visibility. Cars coming from the direction of Route 363 need to slow down significantly to make the left turn onto Berks, which is less than a 90 degree angle, while watching for cars coming up the hill in the other direction. Buses need a much longer clearance time to make a turn in front of opposing traffic, especially from a stop, so the buses and cars will likely get tied up at the corner. This area slows to a crawl when the weather is bad.

It very well could be that the Army Reserve Base is a suitable property for the bus depot, but the roads in this quiet section of the township simply were not built for this volume or type of traffic. We are afraid that eventually traffic lights will need to be installed, which will further snarl the area. We are also worried that eventually Berks Road will need to be widened. Worcester Township's Open Space policy states that "preserving open space is a core initiative in Worcester," and "Worcester is working to maintain the quality of life to which its residents have become accustomed." Because of this issue, we have become very concerned about our quality of life here. Further, we are concerned that our property value will be severely diminished by the constant coming and going of buses, and by the added traffic and noise directly in front of our home.

We are hoping that the LRA will decide that it will do what is best for the taxpayers of Worcester Township, and find a more suitable use for the Army Reserve property. We look forward to seeing you at the meeting.

Very truly yours,

Frank and Joan Harvey
1588 Broadview Lane
Norristown, PA 19403
484-437-4580

From: "Joan Harvey" <joanharvey@comcast.net>

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

APPENDIX VII

LRA DECISION ON RECOMMENDATION FOR REUSE

Newspaper Advertisements of June 4, 2007, Public Meeting and Reuse Decision

Map of Public Parkland in Worcester Township

Minutes of June 4, 2007, Public Meeting and Reuse Decision

Newspaper Advertisements of June 4 Public Meeting

D2 SATURDAY, MAY 26, 2007 www.TimesHerald.com



081 PUBLIC NOTICE

Board of Supervisors
Work Session Meeting
on Monday, June 4,
2007 at 7:30 P.M. at
North Park, U.S. Army
Reserve Center Local
Redevelopment Authority
(LRA) will be making
the reuse portion of the
property located at 1021
Valley Forge Road, the meet-
ing will be held at
Worcester Township
Community Hall, 1021
Valley Forge Road, in
Fairview Village, PA.

John V. Corbett,
Township Manager

081 PUBLIC NOTICE

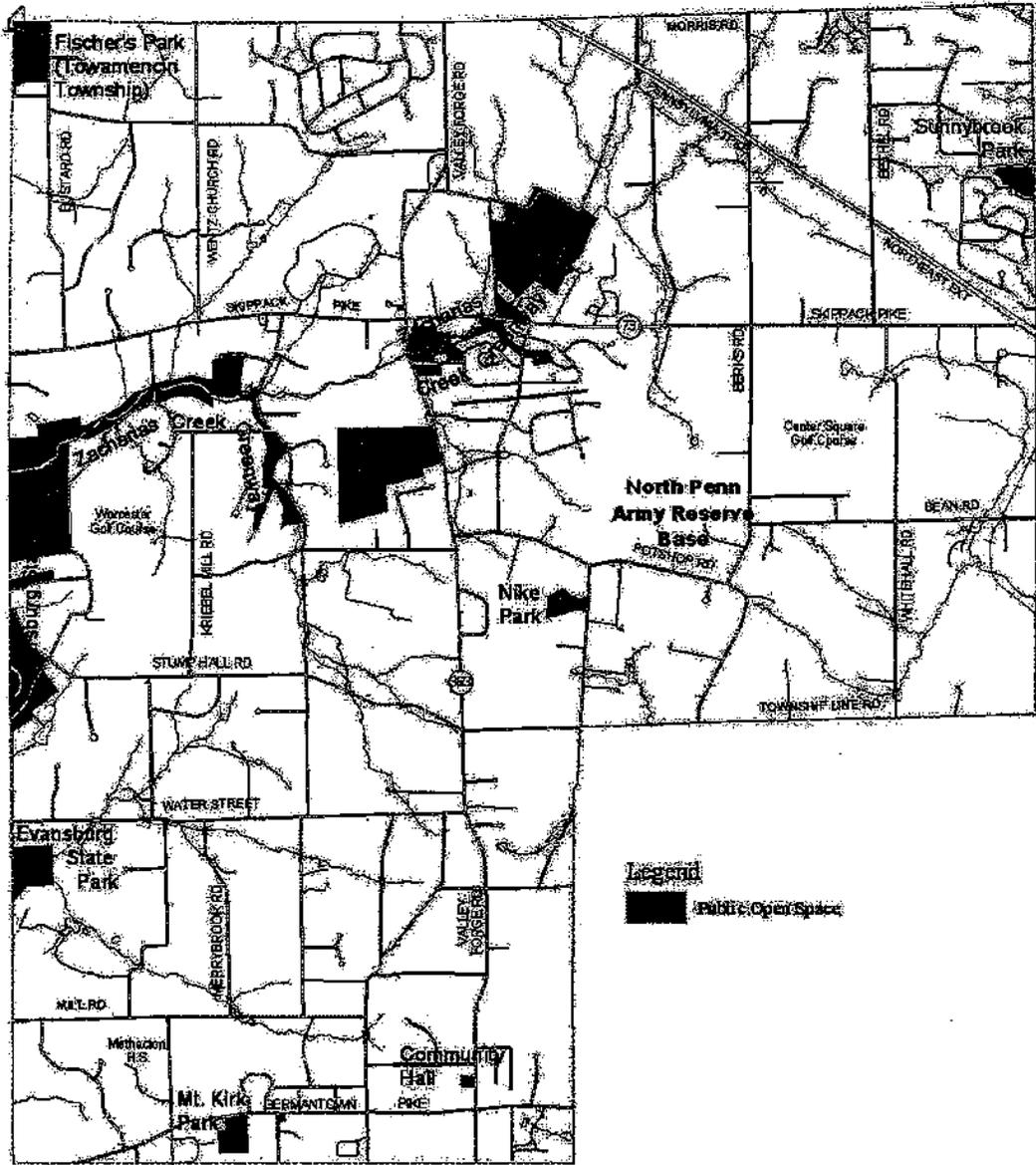
Worcester Township

NOTICE IS HEREBY
given that the regular Board
of Supervisors Work
Session Meeting sched-
uled for Monday, June 4,
2007 at 8:00 A.M. has
been changed to Mon-
day, June 4, 2007 at 7:30
P.M. The meeting will be
held at Worcester Town-
ship Community Hall,
1021 Valley Forge Road
in Fairview Village, PA.

NOTICE IS HEREBY
given that the
Worcester Township



Map of Public Parkland in Worcester Township



Legend
 ■ Public Open Space

MCP Montgomery County Planning Commission
 1000 Montgomery County Courthouse - Planning Commission
 622 South 1st St. - Harrisburg, PA 17101
 PO BOX 203722 - YORK, PA 17403-0372
 www.montgomerycountypa.gov
 This map is based on GIS data supplied by and other sources. It is not intended to be used as a legal document or for any other purpose.
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Minutes of June 4, 2007, Public Meeting and Reuse Decision

WORCESTER TOWNSHIP
WORCESTER TOWNSHIP BOARD OF SUPERVISORS
WORK SESSION
WORCESTER TOWNSHIP COMMUNITY HALL
FAIRVIEW VILLAGE, PA
MONDAY, JUNE 4, 2007 7:30 P.M.

CALL TO ORDER

John Harris called the regularly scheduled work session to order at 7:30 P.M.

LRA USE DELIBERATION

The Board of Supervisors acts as the LRA Board. They are responsible for determining the use of the North Penn Army Reserve Base on Berks Road. They have had many months of hearings and discoveries on the property.

Susan Caughlan, project coordinator, gave an overview of the entire process, stating that the LRA is charged with the final decision on the use of the base. There are two options: 1. Public benefit conveyance or 2. Sell at a public auction, which would be conducted by the Federal government. Six months of applications, reviews, and presentations of Notice of Intent (NOI) from June, 2006 through December were received. One from Methacton School District proposed use for a school bus depot utilizing 2/3 of the property leaving a need to find a use for the remaining property. This would be a 40% discount sale to Methacton School District.

Several public benefit groups reviewed the site and did not follow through with a NOI.

Municipality can receive site at no cost for park and recreations use through the Federal Lands to Parks program. The Township will need additional meeting for input to determine uses. Trails, open space, necessary infrastructure, water, sewer, electricity, buildings and parking are already present. The building is structurally sound and could be retrofitted for numerous uses, including the Methacton Community Theater who expressed interest in using the building as a co-user. The Federal Land to Parks program requires public access and other co-use proposals did not provide that.

If the property is sold at auction, it is considered un-zoned. The Army could auction off the property after rezoning by the Township and the high bidder would be held to the rezoned terms for development. The property would then be returned to the tax rolls and no Township maintenance required.

Arthur Bustard referenced a June 1, 2007, memo on the environmental conditions and Department of Defense responsibilities.

Susan Caughlan said Army is required to clean up property based on the evaluation of the uses of the property. She has identified areas of concern that require additional information and exploration. After the use is determined, more testing will be done. The Army must clean the property to use specific.

A Phase I study is complete and PA Recycling Act requires the current owner to clean up any contaminations before conveyance.

Arthur Bustard asked what defines "community use" for the building and if it can offset maintenance costs.

Susan Caughlan confirmed that the Township is allowed to charge a fee for building use but all excess revenues must be returned to the park for maintenance or improvements. After the Program of Utilization is complete, any park can benefit from excess revenues.

Arthur Bustard asked about current maintenance of building and turnover condition. Susan Caughlan said it must be fully functional and up to Army standards.

John Harris asked if it is a park, are there time requirements to develop it? Susan Caughlan said initial 5 year plan must be presented with the application.

John Harris said the LRA has been working on this for one year and has heard all the proposals. A park use has few negatives but a bus depot shows intense use of buses on roads and a detrimental effect to local neighborhoods.

Chase Kneeland stated the LRA must act as a visionary to make the decision, but they have more clarity of what we do not want. Major road improvements would be needed for the school use so he favors to evolve property into a park.

Arthur Bustard echoed Mr. Kneeland stating that there are tremendous possibilities for the building and does not want to lose the potential. The site is not economically feasible for school's proposed use and a community group should be formed for input on park use.

A motion by Arthur Bustard and seconded by Chase Kneeland and passed by all to recommend to Army to convey the property to the township for park and recreation use.

Susan Caughlan said the next step is to prepare a plan for HUD and the Army on the recommended use. Based on the process, she suggested the June 20th board meeting should be used to present the plan to the public. It is due to HUD by September.

A motion by Arthur Bustard and seconded by Chase Kneeland and passed by all for Susan Caughlan to prepare plan for review at the June 20th, 2007 meeting.

PUBLIC COMMENTS

(RESIDENT) asked if the park is too much of a burden on the township, can they back away and when will they know costs?

James Garrity, Township solicitor, said that considering the cost of 19 acres in Worcester, maintenance costs are nominal.

(RESIDENT) requested that the historical use for this site be retained.

(RESIDENT) asked if the public can see environmental report.

(RESIDENT) thanked the Board of Supervisors and Susan Caughlan for consideration given to the Methacton Theater Group.

7. ADJOURNMENT

There being no further business to come before this Board, Mr. Harris adjourned the regularly scheduled work session at 8:44 PM.

Respectfully submitted,

Arthur C. Bustard, Secretary

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

APPENDIX VIII

PUBLIC PRESENTATION OF DRAFT BASE REUSE PLAN

**Newspaper Advertisement of June 20, 2007, Public Meeting and Presentation of Draft
Base Reuse Plan**

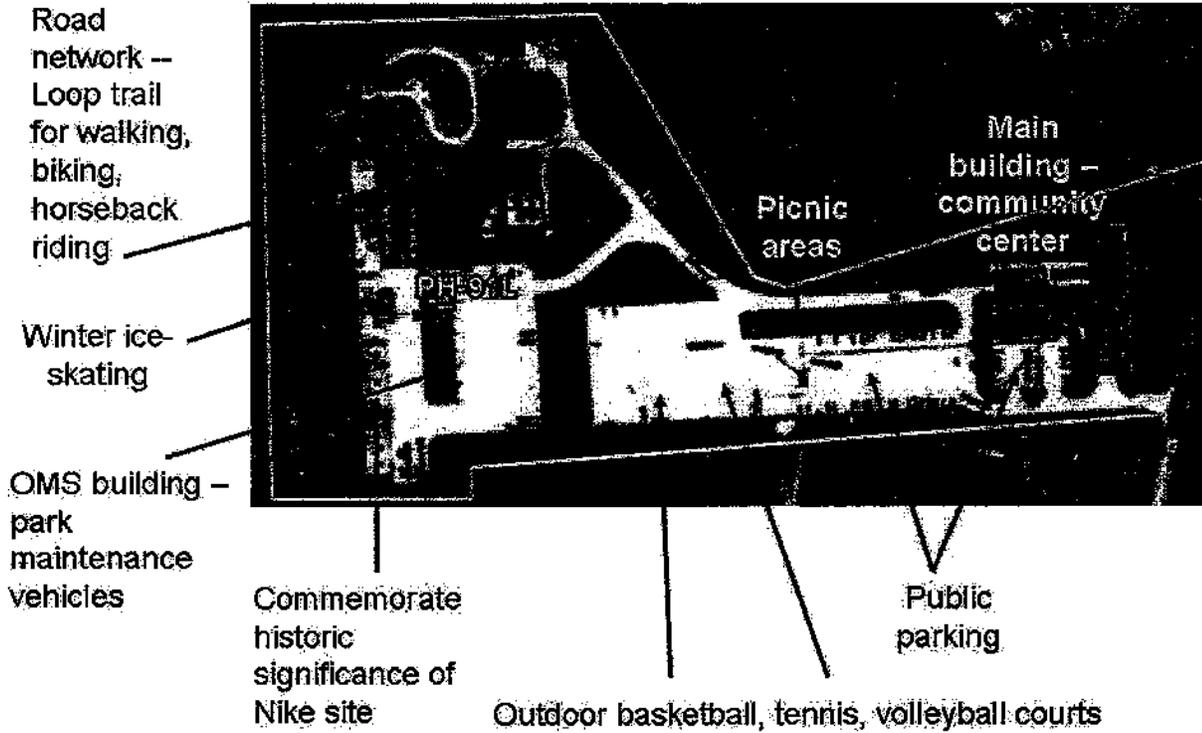
Site Plan Showing Proposed Uses at the Property

Transcript of Public Comments at June 20, 2007, Public Meeting

Resolution No. 07-15

Site Plan Showing Proposed Uses at the Property

Possible Park & Recreational Uses of the Site



WORCESTER TOWNSHIP

BOARD OF SUPERVISORS

MONTGOMERY COUNTY, PENNSYLVANIA

- - -

PUBLIC COMMENT ON THE NORTH PENN USARC

- - -

Wednesday, June 20, 2007
Commencing at 7:50 p.m.

- - -

Worcester Township Community Hall
1031 Valley Forge Road
Fairview Village, PA

- - -

BOARD MEMBERS:

JOHN R. HARRIS, Chairman
ARTHUR C. BUSTARD, Secretary

- - -

COUNSEL APPEARED AS FOLLOWS:

JAMES J. GARRITY, ESQUIRE
Solicitor for the Township

ALSO PRESENT:

JOSEPH J. NOLAN
Township Engineer

JOHN V. CORNELL
Township Manager

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P R O C E E D I N G S

(SUSAN CAUGHLAN made a presentation to the Board.)

- - -

THE CHAIRMAN: We are still in the hearing mode concerning the LRA project, but it is time for questions from the audience. If there is anyone who has any questions about any aspect of the procedure, how it is all operated or on Susan's report, now is the time to do so. We also have Ms. Gabor from the Department of Defense who is the overseer for the project, as well as Gary Moulder who is here from the Department of Environmental Protection who is the overseer for the State of Pennsylvania on EPA matters. He will be the one who will help guide us through this procedure. So, if we are going to have a park in the Township, it will be a park where you would want to be and not one with problems. That is part of our safeguards in the process.

Are there any questions that anyone would like to ask? If so, please

2 state your name and address for the record.

3 MR. PHILLIPS: Jim

4 Phillips, 2405 North Wales Road. I was
5 wondering if we have any figures yet on how
6 much it will cost us annually to have the
7 building, and since the Army is here maybe
8 they can shed some light on that even though
9 it is in a mothball state.

10 THE CHAIRMAN: Do you
11 have any estimates on the annual cost of
12 maintenance of the building?

13 MS. CAUGHLAN: The
14 building is not being mothballed. It is being
15 currently used by several Reserve Units that
16 are assigned to that building. A lot of the
17 maintenance costs are not pertinent to the
18 Township, the reason being that the Army
19 contracts out all of their maintenance
20 activities to outside sources, so none of
21 those numbers are going to be relevant to the
22 Township.

23 The cost that I received
24 for electric is in the range of thirty
25 thousand dollars a year, I believe, and

2 natural gas which is a heating source is about
3 the same. Again, that will depend on a great
4 many things including how much of the building
5 is used and what use the building is put to.

6 MR. PHILLIPS: And how
7 much would it cost to mothball it? Would the
8 Army do that for us?

9 MS. GABOR: Liz Gabor.
10 Legally, the services are not allow to
11 mothball property so the property is to be
12 maintained and then disposed to a new entity.

13 THE CHAIRMAN: One of
14 the things that may help us -- and this is not
15 a decision that has been made -- but assuming
16 the rest of this procedure goes through as
17 planned and we get all of the approvals, my
18 assumption is that we probably will need a
19 form of commission as was mentioned at last
20 month's meeting of six, eight, ten Township
21 residents who would become a park commission,
22 who would make recommendations after a series
23 of meetings as to what sort of uses they would
24 like to see on the property.

2 screen tonight was some of the things she
3 thought of, but we haven't sat down and had
4 all of the various people from the Township
5 think it through and see what would be
6 practical and what other possibilities there
7 are.

8 So, probably there is
9 quite a bit of time between now and 2010 or
10 2011 when we get the keys to the place to
11 think through what we would like to do there,
12 and I suppose that we might not need to use
13 the entire building, that there might be a
14 certain amount of ceiling that might be
15 appropriate.

16 As far as the rest of
17 the place, I would expect we probably would
18 have a good idea about what we want to do with
19 the rest of it, and we would have processed
20 the costs of doing those things at the same
21 time. But as pointed out the last time, we
22 were getting the entire property for free.
23 It's nineteen acres, so you have that value of
24 nineteen acres that we won't have to pay for,
25 so I think the maintenance costs would be

2 fairly small by comparison.

3 MR. PHILLIPS: When do
4 you plan on starting the committee?

5 THE CHAIRMAN: It is
6 part of the vision at this point, but at the
7 appropriate time when we really do know we are
8 getting the property, maybe at that point it
9 would be appropriate to start thinking about a
10 committee. This is now 2007 and we have three
11 or four years to get that part done.

12 MR. PHILLIPS: The only
13 thing that concerns me is that sometimes you
14 can't afford a sale. You know, you see a lot
15 of things for sale at the mall and you want to
16 buy them and people extend themselves a little
17 further than they should, and I don't want to
18 see that we get caught up in some quagmire
19 where it's like a money pit.

20 THE CHAIRMAN: I don't
21 think we are talking about a money pit, but we
22 will need to cut the grass a little bit, and I
23 don't think we are talking about hundreds of
24 thousands of dollars a year. We might be
25 talking five to ten thousand to heat it at a

2 minimum if the pipes don't freeze, and I don't
3 know what other costs, if any, would be there.

4 MR. PHILLIPS: Thank
5 you.

6 MR. MOLLICK: Jim
7 Mollick. Environmentally, I guess the Army is
8 responsible for the cleanup of the property
9 when they sign off on it. Suppose ten years
10 from now something is discovered relative to
11 that environmental issue, what is going to
12 happen then?

13 MR. MOULDER: The Army
14 is still responsible. They are responsible
15 for the cleanup to certain standards under
16 Pennsylvania law. The Land Recycling and
17 Remediation Standards Act -- we call it Act 2,
18 that's easier to remember -- basically, under
19 that they have to meet certain standards. If
20 they meet certain standards and later on we
21 find some contamination that they didn't
22 discover or it was there, they will have to
23 come back.

24 MR. MOLLICK: At no cost
25 to the Township?

2 MR. MOULDER: No, not
3 directly. It is the taxpayers spending
4 federal money, but it will be at no cost to
5 the Township.

6 MR. MOLLICK: I have a
7 follow-up to Jim Phillips' question. You
8 can't really give us any figures on what it is
9 going to cost to maintain and operate the
10 facility because you don't know what you are
11 going to do at this time; correct?

12 THE CHAIRMAN: Yes.

13 MR. MOLLICK: Thank you.

14 MR. FOX: Bill Fox,
15 Meadowbrook. It seems like a unique
16 opportunity. We have nineteen acres here that
17 the Federal Government is giving us. We have
18 a substantial building that may need some
19 improvements, but it seems to me with those
20 improvements we can enhance it
21 environmentally. The surface is paved. Susan
22 has shown that a lot of those surfaces can be
23 used, although they may have some minimum
24 maintenance. I think it's a great opportunity
25 for the Township and I totally endorse it.

2

THE CHAIRMAN: We agree.

3

We felt that over time there will be an

4

increased demand for park space. We may have

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something on the order right now of what we

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really do need, but as populations grow and

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ideas and demands and visions grow, we will

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have a piece of land available for those

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dreams to come true.

10

MR. FOX: I also

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understand that the location of this is close

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to some of the PECO lines, that we can tie

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into Pathway so this could become a place

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where people can go cycling and hiking and

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that sort of thing. So, it's not just an

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isolated element in the landscape, but it is

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connecting to other recreational uses as well.

18

THE CHAIRMAN: Absolutely.

19

MR. SMITH: Oliver

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Smith, Fisher Road. I came out tonight to

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talk in support of this project never

22

realizing our property was going to be

23

discussed at the same meeting, but maybe it's

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a good thing because my wife and I have

25

offered to give up something of real value

2 to maintain open space forever in this
3 Township. So, both of us are very much in
4 agreement with this project, and with the
5 money we have spent in the past, it seems like
6 a no brainer to take advantage of this opportunity.

7 THE CHAIRMAN: Thank you. We
8 appreciate that.

9 Is there anyone else who has
10 a comment or question?

11 MS. McGRANE: Dee Dee
12 McGrane. I am representing the Farmers Union Horse
13 Company, and I want to put our strong approval on
14 the park idea of the property.

15 THE CHAIRMAN: Thank you.
16 Any other comments?

17 MR. DAVID: Kim David, Berks
18 Road. I would like to speak in support of the
19 project. I live closeby and I know there is a need
20 for a park in that area.

21 I also feel the plan fits
22 into the context of the area with the farms that
23 surround it, and our comprehensive plan recognizes
24 it's a scenic road and it would be a very good use
25 for the property.

2

THE CHAIRMAN: Thank

3

you.

4

MR. KAZIMER: William

5

Kazimer, Fairview Village. Are zoning and

6

planning needed for the residents that live

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nearby this nike site to express their

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opinion, or is this hearing taking care of

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that?

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THE CHAIRMAN: I don't

11

think there would be any other need.

12

MR. BUSTARD: Bill,

13

there were three meetings where the neighbors

14

talked about it, and the problem is it is

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federal land so it is not zoned any specific

16

way. So we did have three meetings in which

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the neighbors came and made their opinions

18

known.

19

MR. KAZIMER: So the

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answer is there will be no zoning or planning

21

meetings necessary?

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MR. GARRITY: That would

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depend on how the Township ultimately decides

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to use the property. The Township at some

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point when it gets the keys, as John phrased

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it, is going to have to zone the property. I think although the Army has maintained it all along, they don't consider it zoned. I think we consider it zoned.

It has a zoning classification on it. It is possible the Army doesn't recognize our zoning on it, but that's another story. But at some point the property will be zoned. It is actually illegal in Pennsylvania to have unzoned land in municipalities, so it will be zoned and it will be zoned probably with something that recognizes park and recreation purposes.

If, however, the Township wanted to build additional buildings on the property or something like that, that would definitely involve land development issues where the neighbors would have an opportunity to comment on the buildings and where they would be. If there are future uses of the property which are different from park and recreation which has already been discussed, that would result in more public meetings for the neighbors to have an

2 opportunity to comment if they wanted to do
3 so.

4 MR. BUSTARD: It was my
5 understanding that once we get this from the
6 National Park Service, we cannot build
7 anything more on it. It is strictly supposed
8 to be for parks; is that correct?

9 MS. CAUGHLAN: The
10 Federal Lands to Parks Program does require
11 that the Township use the property forever as
12 a park and recreational use; however, any use
13 that comes under the heading of park and
14 recreational can be put on the site. So if
15 the Township would wish to build another
16 building for that purpose that would be
17 permitted; however, no other use of the
18 property would be permitted other than for a
19 public park and recreational use.

20 Also, as Jim indicated,
21 the Supervisors will formally zone the
22 property for municipal use as a park at some
23 future date closer to the assumption of
24 ownership.

25 MS. WALSH: My name is

1

2 Sandra Walsh. I live on Berks Road. My
3 husband and I are both in favor of the park
4 and its use. We are thrilled to see that was
5 one of the options. We were concerned about
6 buses, and I think this will enhance our
7 property values on the street and in the area
8 also because having a park available is really
9 just wonderful.

10

We have used Heebner
11 Park for walking our dog and Norristown Farm
12 Park, and not having to get in a vehicle will
13 really be wonderful. So, we are behind it one
14 hundred percent.

15

THE CHAIRMAN: Thank you
16 for your support.

17

MR. FORMAN: My name is
18 Jon Forman, Paulings Ford Road. I'm a
19 resident of Worcester Township. I am also on
20 the Board of Directors of the Methacton
21 Community Theater, and I want to say I think
22 this is a wonderful opportunity for all of us
23 to indulge in a project that will bring
24 together both the arts and recreation to a
25 single facility that all of the Township

1
2 residents can benefit from. It's a unique
3 opportunity. It's a wonderful opportunity
4 because it does bring together both
5 recreational activities and artistic
6 activities that could be fostered by the
7 presence of a theater, and I thank you very
8 much for considering us in this endeavor.

9 THE CHAIRMAN: Thank you
10 very much.

11 MR. HARVEY: My name is
12 Frank Harvey, 1588 Broadview which would be
13 right across the street from the new facility.
14 Not really understanding the process, I would
15 just like to thank and commend the LRA for the
16 effort and the recommendation, and I think as
17 neighbors we would feel that this would be the
18 best use of the land and, again, I thank you
19 for the effort as a new resident of the
20 Township for the way you guys operate and what
21 you are looking to do in the Township.

22 THE CHAIRMAN: Thank
23 you. Again, Susan has done a tremendous
24 amount of work on this and has become an
25 expert on doing these things which until she

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figured this out, nobody in the world knew how to do it other than Liz. So she has done a tremendous job and put in a huge amount of time and has kept us on our toes as to what has to be done next. She has really been our quarterback on this.

MR. GALET: Vince Galet.

I am also a neighbor and I would just like to echo what he just said, and I would like to say you are doing a good job.

THE CHAIRMAN: Thank you. If there are no other comments, I think we have come to the end of our regular agenda.

Thank you very much.

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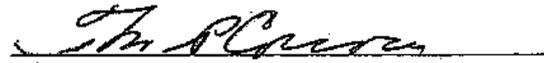
(At 8:35 p.m., the hearing was concluded.)

- - -

C E R T I F I C A T E

I, Thomas P. Corcoran, being an Official Court Reporter, do hereby certify that the foregoing oral testimony on Public Comment on the North Penn USARC was taken stenographically by me on Wednesday, June 20, 2007,, and that this transcript is a true and correct transcript of the same, fully transcribed under my direction, to the best of my ability and skill.

I further certify that I am not a relative, employee or attorney of any of the parties in this action; that I am not a relative or employee of any attorney in this action; and that I am not financially interested in the event of this event of this action.

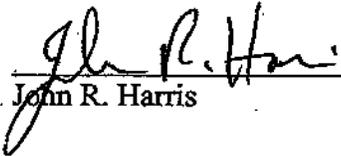

Thomas P. Corcoran
Official Court Reporter

**NORTH PENN U.S. ARMY RESERVE CENTER REDEVELOPMENT AUTHORITY
Worcester, Pennsylvania**

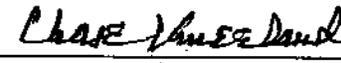
Resolution No. 07-15

It is the recommendation of the North Penn LRA that the North Penn U.S. Memorial Army Reserve Center be transferred to the Township of Worcester, a Second Class Township operating under the laws of the Commonwealth of Pennsylvania, and that the Township acquire the land and buildings to be used for public park and recreational purposes for the benefit of the citizens of the Township of Worcester, and the general public who would have access to a community park, under the Federal Lands to Parks Program.

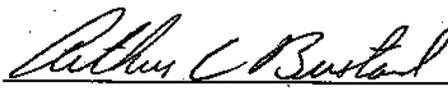
Recommended this 20th day of June, 2007, by the North Penn LRA.



John R. Harris



Chase E. Kneeland



Arthur C. Bustard

**FINAL REPORT AND RECOMMENDATION OF THE
NORTH PENN U.S. MEMORIAL ARMY RESERVE CENTER
LOCAL REDEVELOPMENT AUTHORITY (LRA)**

APPENDIX IX

ENVIRONMENTAL CONSIDERATIONS

Review of Environmental Condition of Property Report – Memo to LRA

**Letter from Federal Facilities Section, Bureau of Waste Management, Pennsylvania DEP,
regarding Environmental Condition of Property Report**

MEMORANDUM

TO: North Penn USARC LRA

FROM: Susan Caughlan

RE: Evaluation and Recommendations Regarding ECP

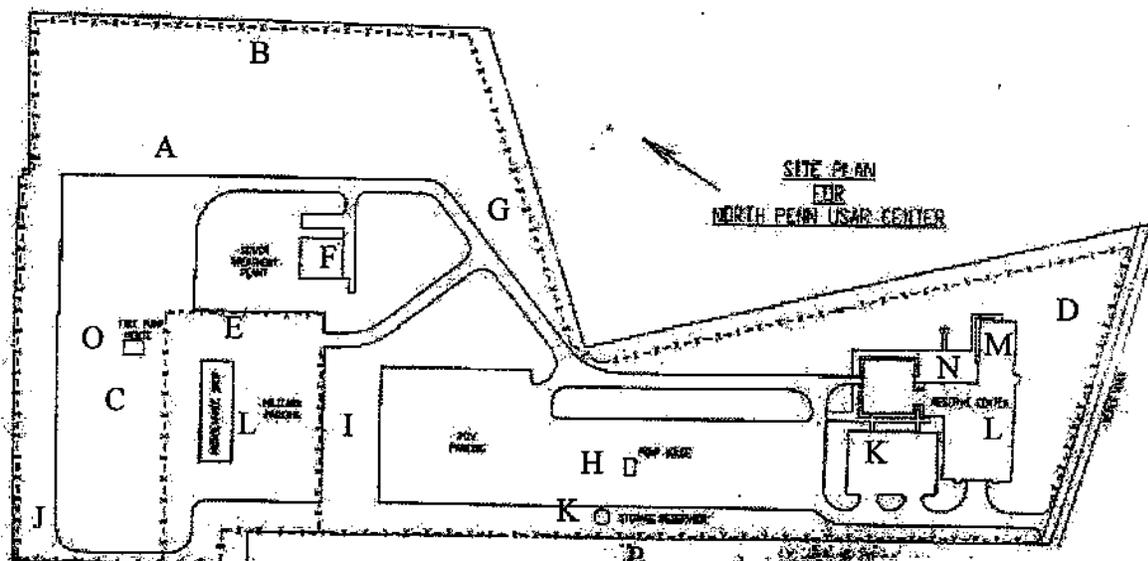
DATE: June 8, 2007

CC: John Cornell, Worcester Township Manager
Liz Gabor, Project Manager, Department of Defense, Office of Economic Adjustment
Gary Moulder, Chief, Federal Facilities, Land Recycling and Cleanup Program, PADEP

The Environmental Condition of Property report was prepared by CH2M Hill and delivered to the LRA in April 2007. As a result of the conclusions in this report, the North Penn Army Reserve property has been designated as Type 7, which is an area that is unevaluated or requires further evaluation. This site contains areas that are unevaluated as well as those that require further evaluation.

The reasons for this designation are as follows. The report noted that several earlier surveys of the site indicated that hazardous substances had been used or disposed of on the property. These surveys recommended soil and groundwater testing, but it could not be determined whether this testing had been done. At one time, at least four underground storage tanks and eleven above-ground storage tanks containing petroleum substances were located at the site. Most of them have been removed, but the documentation on the removal and on the identification and cleanup of any associated contamination is incomplete. Finally, it is recognized that hazardous substances were commonly used and released at Nike Ajax missile sites such as this one. No comprehensive site investigation has been done to identify and evaluate potential soil and groundwater contamination from any of these sources.

I. Areas of Concern. This site plan of the property indicates areas of potential concern. The letters correspond to the discussion of the areas of concern.



A. Nike missile base – launch area. An environmental assessment conducted by the Army's 416th Engineer Command in 1992 indicated that the full nature of the Nike missile base activity was not known, and that records and drawings were incomplete. The assessment noted that the facility had not been screened for past use of hazardous substances or soil and groundwater contamination. It noted that a special study conducted by USEHA in 1991 indicated the presence of synthetic organic chemical contaminants.

Historical aerial photographs indicate the existence of a crescent-shaped berm outside the eastern fence of the missile area which dates from the time of the Nike missile base operation. Documents indicate that activities such as warhead arming, maintenance, and fueling operations may have been conducted in this area (designated "A" on the site plan). An area approximately 12' x 12' is filled with 4" gravel, indicating that soil may have been removed. This area is designated on a 1972 grading plan as a borrow area.

A fire training burn site existed in this area after the Nike installation was closed. Various materials, possibly including hazardous substances, were ignited for fire training purposes. Residues of these materials may remain at this site.

Recommendations: A copy of the 1991 USEHA evaluation should be obtained and reviewed. Soil and groundwater testing should be conducted throughout this area to determine the existence of any contamination from Nike-era activities as well as from the post-Nike activities. Additionally, if area "A" was used as a borrow area, it must be determined whether contamination could have been spread elsewhere on site when this soil was distributed.

B. Nike missile base – buildings area. Historical drawings indicate that several buildings from the Nike era were located in this area, including a generator building, a paint shed, a chemical storage building, an acid storage building, and a missile assembly and test building. Documents indicate the presence of a fuel oil underground storage tank associated with the generator building, but there is no documentation of this tank being identified or removed. These buildings were not demolished until some time after 1973. Subsequent surveys of the property indicate the presence of crushed drums and building debris in this portion of the site. Limited testing has identified contaminants in the vicinity of the debris piles.

Recommendations: A comprehensive evaluation of the area is needed to identify the presence of any demolition debris and underground storage tanks. Soil and groundwater testing should be conducted to determine the presence of any contamination from debris or from Nike-era activities. Debris and USTs should be removed and disposed of properly.

C. Nike silos. The three underground missile vaults are filled with water (two with minimal amounts and one with a substantial amount). Demolition debris is also present in the silos. The hydraulic fluid tank located in each silo has been closed in place. A 1996 study conducted for the Army Corps of Engineers indicated that the debris in the silos may be contaminated with hydraulic fluid, lead, or other unknown contaminants. Limited testing has identified elevated levels of contaminants in some of the silo water.

No determination has been made concerning the structural stability of these 50-year-old underground vaults. Interest has been expressed by the township and the local historical society in

memorializing the historic significance of this Nike missile base, which could include opening one silo for periodic public tours.

Recommendations: All debris and water should be removed from the silos and disposed of properly. Hydraulic fluid tanks that were closed in place should be cleaned and sealed to prevent the possibility of contamination from residue that may remain. A study should determine whether the vaults are structurally stable, how they should be secured against deterioration and collapse, and whether one vault can be made accessible to the public.

D. Drainage swale. Heating oil entered a swale at the southeastern edge of the property as the result of a spill in the boiler room of the main building. Wash water from the boiler room drains to this swale. Stormwater from the site also flows to this swale via a pipe and ditch system. This swale is upstream of a headwater creek of the Stony Creek watershed, which is classified by DEP as a trout fishing stream.

Recommendations: The soil in this area should be tested for contamination, and the connection to the boiler room wash water discharge should be closed to prevent further contamination. Groundwater testing should be conducted to determine whether off-site contamination is occurring.

E. Oil-water separator and OMS building. The grease rack and wash rack adjacent to the OMS building drained to an underground oil-water separator, including a sand filter. Waste water was probably routed to either the on-site wastewater treatment system or the stormwater drainage ditch system. Earlier soil testing adjacent to the wash rack identified elevated levels of vanadium.

Recommendations: The oil-water separator is no longer in use and should be properly closed. Further soil testing should be conducted in this area.

F. Former sewage treatment system. Site drawings show that a spoils area was associated with the former sewage treatment system.

Recommendation: Soil and groundwater testing in this area should be conducted to identify any possible contaminants.

G. UST and gasoline pump. A 1000-gallon gasoline UST and gas pump were removed from this location in 1996. Soil testing did not indicate any contamination, but the testing did not include the complete list of parameters specified by DEP. In addition, this tank is still listed by DEP as inactive, rather than closed.

Recommendations: Soil and groundwater testing should be conducted using the full range of DEP parameters, and proper documentation should be submitted to DEP to list this tank as closed.

H. Oil spill. A 1992 environmental assessment of the site, conducted by the Army's 416th Engineer Command, indicates that an oil spill occurred at the heating oil AST located next to the potable water pump house. It is not known whether the spill was remediated.

Recommendation: Soil testing should be conducted to identify any remaining contamination.

I. USTs and ASTs. At least four USTs and eleven ASTs were located on this site. Some of these tanks have been closed in place and some have been removed. Most of these closures have not been properly documented as required by Pennsylvania law. Several of the tanks remain on DEP's list of leaking or abandoned tanks.

Recommendations: All storage tanks should be properly closed according to DEP regulations. Soil and groundwater testing should be conducted as necessary in conjunction with these closures. The ECP states that it can be assumed that all of the known USTs have been removed from the site (section 3-4). This conclusion cannot be reached until these tanks have been located and properly closed and the closures documented and approved by DEP.

J. Groundwater. In 1979, groundwater contamination with VOCs was identified and was determined to have originated from the Transicoil property on North Trooper Rd. Testing of the potable well water on the Army Reserve base property in 1993 and 1994 indicated elevated levels of VOCs. At some point, a monitoring well was installed in the northwestern corner of the property.

Recommendations: The monitoring well records should be located and reviewed to determine the status of the groundwater contamination in that area. In addition, sampling of the potable well water should be conducted.

K. PCBs (two locations). The pad transformer (near the main building) and one pole-mounted transformer (near the potable water tank) on the property have been identified as containing regulated amounts of PCBs. This equipment is required to be labeled, inspected, and registered. Inspection and maintenance records must be maintained on site. The report does not indicate whether the pole-mounted transformer is properly labeled, and whether these transformers are registered, inspected, and maintained as required by law.

Recommendations: It should be determined whether both transformers are properly labeled and registered. Inspection and maintenance records should be located and reviewed for any indication of leaks.

L. Radon (two locations). Radon testing was conducted in the main building, OMS building, and pump house building in 2004. Results indicated indoor radon levels well below the norm for this area.

Recommendation: Because this property is located in an area known for high radon concentrations, testing should be repeated.

M. Asbestos. Evaluations of the property have identified asbestos-containing materials in building material contained in the main building and OMS building. Some of this material has been removed over the years, but much remains. In addition, testing for asbestos-containing material was not comprehensive. Representative areas were selected for testing, and assumptions were then

made concerning the presence or absence of asbestos-containing material in other areas of the buildings with similar building materials.

It is to be expected that asbestos-containing materials were used in the construction of the Nike-era buildings. If debris from the demolition of these buildings remains on site or in the missile silos, these areas may now be contaminated with asbestos.

Recommendations: A comprehensive evaluation of the presence of asbestos-containing materials should be conducted for all buildings on site. Appropriate containment or removal measures should then be identified.

N. Lead paint. A 2005 report identified the presence of lead-based paint on walls, doors, frames, ceilings, and radiators in the main building and OMS building. Lead paint may also be present in the other buildings on site, and in the missile silos.

Recommendations: A comprehensive evaluation of the presence of lead-based paint should be conducted for all buildings on site. Appropriate containment or removal measures should be identified.

O. Fire pump house. The fire pump house sits on top of the #2 missile silo, which is filled with water used for firefighting purposes. After over 50 years, the building's foundation is likely to be deteriorating because of excessive exposure to moisture.

Recommendations: This building should be demolished when the water is pumped out of the silo. There is no need to keep firefighting water on site since a fire hydrant was recently installed on the street just outside the entrance to the base.

P. Potable water supply. This site is supplied by a private well. The system includes an above-ground storage tank and a well pump located in a separate building. Documents indicate that a new well pump was installed in 1993 and a new well was drilled sometime prior to 2000. The most recent tests of the potable water supply are dated 1997. In the past, elevated bacteria levels have been identified in the water supply, resulting in the installation of a chlorination system. Elevated levels of TCE have been found in groundwater wells in the area due to environmental contamination off site and also possibly on site.

Recommendations: The well water should be tested for potability and specifically for the presence of TCE. Documentation concerning the installation of the new well and new well pump should be located.

II. Overall Recommendations.

A. Soil and groundwater testing. Over 50 years of active use by various branches of the Army have resulted in multiple avenues of possible contamination throughout the property. Reports over the years have identified spills, soil and groundwater contamination, and areas of concern that were recommended for further investigation. In some cases, remediation of known contamination was undertaken. In other instances, it cannot be determined whether further testing or remediation was conducted as recommended in various reports.

Very limited soil and groundwater testing has been conducted in certain areas of the site over the years. A comprehensive site-wide schedule of testing should be developed to highlight areas and contaminants of concern, in order to identify whether any contamination exists on site and to define its nature and extent. A site survey should be designed to locate any USTs or piping that may remain in the ground.

B. Cleanup standards. Contaminant levels are discussed and evaluated in the ECP relative to the standards of Act 2, the Pennsylvania Land Recycling Act. The ECP does not indicate whether the reference standards are residential or nonresidential (for soil contamination), and used-aquifer or nonuse-aquifer (for soil-to-groundwater contamination). The LRA and the Army must work together to determine which standards will be sufficiently protective of human health and the environment for the proposed reuse of the site.

C. Additional documentation. Reference was made in a 1993 report (Environmental Compliance Assessment Army Reserve Report) to a special study conducted by USAEHA in 1991 which revealed the presence of synthetic organic chemical contaminants at the site. This report has not been made available to the LRA.

A 1989 proposal for a site investigation by the Army Corps of Engineers refers to recommended locations for soil boring tests in a 1988 EPA Site Analysis. This EPA report has not been made available to the LRA.

These reports should be located and reviewed to determine whether they contain information that is relevant to an accurate assessment of the environmental conditions at the property.

D. Previous site assessment and remediation activities. The Army has a Cooperative Multi-Site Agreement with the Pennsylvania Department of Environmental Protection to address cleanup issues at military installations. Some environmental assessment and remediation work has already been done at the property under this agreement. Site assessment and remediation efforts should be coordinated with representatives of the PADEP Land Recycling and Cleanup Program's Federal Facilities Office under this Cooperative Multi-Site Agreement.

**Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
June 11, 2007**

Bureau of Waste Management

717-783-9475

Mr. Bruce L. Kish
BRAC Environmental Coordinator
Department of the Army
Headquarters, 99th Regional Readiness Command
99 Soldiers Lane
Coraopolis, PA 15108-2550

RE: Comments to the Environmental Condition of Property Report for US Army Reserve Center North Penn (PA139)

Dear Mr. Kish:

The Pennsylvania Department of Environmental Protection (Department) received an Environmental Condition of Property (ECP) Report on April 13, 2007, for the US Army Reserve Center, North Penn (PA139). The Army is requesting concurrence from the Department in the designation of this site as an uncontaminated property, by definition under CERCLA 120(h)(4)(A) and has recommended the classification of this installation to be a Type 7 - Unevaluated Property or Property Requiring Additional Evaluation.

Known areas of contamination existed and continue to exist on this installation. The Department has determined that for this reason as well as reasons outlined below, the ECP Report fails to demonstrate that this property is uncontaminated and therefore cannot concur with the Army's conclusions based on information provided in the Report.

A total of six sites associated with USARC North Penn were identified under the Cooperative Multi-Site Agreement (CMSA). These are:

- Site 01 - Fenceline assessment - Resolved 2/5/01
- Site 03 - NIKE Site - Scheduled
- Site 04 - Fuel Oil AST - Resolved 1/30/02
- Site 05 - Fuel Oil UST - Resolved 1/30/02
- Site 07 - FTA Burn Area - Scheduled
- Site 08 - OMS Service Pit Closure - Scheduled

Sites 01, 04 and 05 were resolved as stated above and do not require further action. According to the Department's Southeast Regional Office (SERO), a 1,000 gallon unleaded gasoline storage tank was closed. Although no further follow-up is required with regard to this tank, it is uncertain if this site was one of the CMSA sites that was previously resolved. Clarification is needed regarding this tank closure.

The Department's SERO staff previously evaluated the fence line areas of USARC North Penn in 2000 as part of the CMSA Pilot Study. A total of twenty soil samples were taken by a Department contractor at discreet locations along the fence line and analyzed for diesel fuel, short list parameters (benzene, toluene, ethyl benzene, cumene, and naphthalene), fluorene, phenanthrene, polychlorinated bi-phenyls (PCBs), pesticides and herbicides. Several contaminants were detected but all were below Act 2 standards for direct and soil-to-groundwater pathways.

A number of underground storage tanks (USTs) and above ground storage tanks (ASTs) were identified in the ECP Report, some of which may have been closed in place or removed. Section 3-4 of the ECP Report assumes that all of the known USTs have been removed from the site. All regulated storage tanks must be closed in accordance with the regulations provided by the Storage Tank and Spill Prevention Act (Act 32), including any listed as inactive, leaking or abandoned tanks. A number of these tanks are still listed as such in the Department's files. Documentation and sample analysis confirming proper tank closures should be included in the ECP Report to demonstrate attainment of Act 32 standards.

Characterization of groundwater is necessary to demonstrate attainment of a Land Recycling and Environmental Remediation Standards Act (Act 2) standard. Past sampling of the installation's potable well revealed elevated concentrations of metals and VOCs. This contamination may be the result of a background condition. If so, attainment of the Background Standard as provided by Act 2 may be demonstrable. The Department's files also indicate that a release was documented upon removal of the 20,000 gal. No. 2 heating oil tank. This tank is not considered a regulated storage tank; however, remediation would be subject to the provisions of Act 2.

Characterization and/or follow-up of the documented No. 2 heating oil spill near the potable well pump house would be required to demonstrate attainment of an Act 2 standard. Additionally, characterization of an oil-like substance or sheen, which was reported flowing from the sewer outfall and within the drainage ditch in the southeastern portion of the property, would need to be documented to demonstrate compliance with applicable standards.

Characterization of the "spoils" reportedly associated with the sewage treatment plant upgrade need to be addressed.

The CMSA Pilot Study concluded that all Pennsylvania NIKE Missile Batteries were inadequately characterized for impacts to the environment and their potential impacts need to be reassessed on a case-by-case basis. The U.S. Army Corps of Engineers, Baltimore District Office, is currently performing waste removal activities at a number of former NIKE sites in Pennsylvania and Maryland covered under the Formerly Used Defense Sites program.

The ECP Report failed to address the Fire Training Area (FTA) "Burn Area" listed as Site 05 on the List of Scheduled Sites under the Cooperative Multi-Site Agreement between the Department and DOD. As stated in the CMSA Pilot Study, the Department considers all FTAs serious areas of environmental concern. Releases associated with these sites support the conclusion that each specific site needs to be assessed and remediated.

Additional characterization should be considered for the wash rack and related oil water separator (OWS) to determine if a release has occurred. A conclusion of the CMSA Pilot Study determined that OWS were consistently viewed as areas of environmental concern and recommended that all oil/water separator units be individually evaluated. This additional characterization should also determine compliance with National Pollutant Discharge Elimination System (NPDES) discharge requirements.

In view of the above comments, the Department cannot concur with a Type 7 classification of this property or the designation of uncontaminated property. The Department does agree that additional evaluation of this property is required and that additional remedial actions may be necessary based upon the results. This correspondence fulfills the Department's review, as requested, within the 90 day time period. Please feel free to contact me, Gary Moulder, Chief, Federal Facilities, Land Recycling and Cleanup Program at 717-783-9475, or via e-mail at gmoulder@state.pa.us if you have any questions regarding these comments to the ECP Report.

Sincerely,

Gary W. Moulder, CHMM
Federal Facilities Section
Division of Remediation Services

cc: D. Armstrong
J. Mattern
P. Renwick
S. Caughlan – Admin. Coordinator USARC North Penn
Reading File

GWM:gwm

APPENDIX B. RECORD OF NON-APPLICABILITY

This appendix contains a Record of Non-Applicability (RONA) documenting the determination that the Proposed Action falls into conformity with the U.S. Environmental Protection Agency-approved state implementation plans and a written Conformity Determination is not required.

RECORD OF NON-APPLICABILITY

In Accordance with the Clean Air Act – General Conformity Rule for
Closure of the North Penn Memorial United States Army Reserve Center, Norristown,
Pennsylvania

May 18, 2010

In accordance with the 2005 Base Realignment and Closure, the U.S. Army proposes to close the North Penn Memorial United States Army Reserve Center in Norristown, Pennsylvania, and dispose according to applicable laws, regulations, and national policy. Foreseeable reuse alternatives include a public conveyance of the entire parcel to Worcester Township for public park and recreational uses.

General Conformity under the Clean Air Act, Section 176 has been evaluated for the project described above according to the requirements of 40 CFR 93, Subpart B. The General Conformity Rule applies to federal actions occurring in regions designated as being in nonattainment for the NAAQS or in attainment areas subject to maintenance plans (maintenance areas). Threshold (*de minimis*) rates of emissions have been established for federal actions with the potential to have significant air quality impacts. If a project/action located in an area designated as nonattainment exceeds these *de minimis* levels, a general conformity analysis is required. Montgomery County, PA is designated as a moderate ozone nonattainment area, and thus NO_x and VOC thresholds apply. Montgomery County is also designated as a PM_{2.5} nonattainment area, and PM_{2.5} thresholds apply.

A General Conformity Analysis of this project is not required because:

Total direct and indirect emissions from this project would include minor short-term effects from demolition and construction. Long term emissions from reuse would include heating and air conditioning of a building to be used by a community theater group and vehicular traffic generated by the theater and park. These emissions would be less than the annual *de minimis* values.

The *de minimis* values established in 40 CFR 93.153 are:

NO_x: 100 tons; VOC: 100 tons; PM_{2.5}: 100 tons

Furthermore, the project is not considered regionally significant under 40 CFR 93.153 (i).

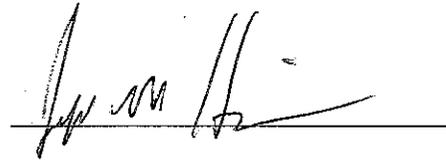
Montgomery County, PA is in attainment for criteria pollutants CO, NO₂, SO₂, PM₁₀, and Pb and therefore these pollutants are not subject to conformity review.

RECORD OF NON-APPLICABILITY

Closure of the North Penn Memorial United States Army Reserve Center, Norristown,
Pennsylvania

Supporting documentation and emission estimates:

- Are Attached
- Appear in the NEPA Documentation
- Other (Not Necessary)



JEFFREY M. HRZIC
Chief, Environmental Division

APPENDIX C. CONSULTATION

This appendix contains the following consultation and coordination documents:

- Letter sent to the U.S. Fish and Wildlife Service
- Letter sent to the Pennsylvania Department of Conservation and Natural Resources
- Letter sent to the Pennsylvania Game Commission
- Letter sent to the Pennsylvania Fish and Boat Commission

NOTE: Attachments were identical for the above letters and are shown in this appendix after the letter sent to the U.S. Fish and Wildlife Service.

- Letter sent to the Pennsylvania Historical and Museum Commission

NOTE: Attachments 1 and 2 to this letter were identical to Attachments 1 and 2 shown with the U.S. Fish and Wildlife Service. Attachment 3 is included as Appendix C of this EA.

- Letter sent to the Absentee-Shawnee Tribe of Indians of Oklahoma

NOTE: Identical letters were sent to seven federally-recognized tribes (Absentee-Shawnee Tribe of Indians of Oklahoma, Delaware Tribe of Western Oklahoma, Cayuga Nation of Indians, Onondaga Indian Nation, Oneida Indian Nation, Akwesasne Mohawk Nation, and Tonawanda Band of Seneca). Attachments were identical to Attachments 1 and 2 shown in this appendix after the letter sent to the U.S. Fish and Wildlife Service.

- Response received from the Pennsylvania Department of Conservation and Natural Resources
- Response received from the Pennsylvania Game Commission
- Response received from the Delaware Tribe of Western Oklahoma
- Initial response received from the Pennsylvania Historical and Museum Commission
- Transmittal of the Pennsylvania Historic Resource Survey Form to the Pennsylvania Historical and Museum Commission
- Response received from the Pennsylvania Historical and Museum Commission
- Record of Conversation with the U.S. Fish and Wildlife Service
- Record of Conversation with the Pennsylvania Fish and Boat Commission

This appendix also contains a Memorandum for the Record regarding tribal consultation actions for this environmental assessment.



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

February 19, 2010

David Densmore
United States Fish and Wildlife Service
Pennsylvania Field Office
315 South Allen St., Ste 322
State College, PA 16801-4850

Dear Mr. Densmore:

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the North Penn Memorial United States Army Reserve Center (North Penn USARC) in Norristown, Pennsylvania (Enclosure 1). These recommendations were approved by the President on September 23, 2005, and forwarded to Congress.

The North Penn USARC is a 19-acre parcel located at 1625 Berks Road, Norristown, Pennsylvania. The USAR Center contains seven permanent structures, including three former Nike Ajax missile silos (Enclosure 2). The Property was used as an administrative center and an outdoor training area. Construction of both the 45,000-square-foot administration building and the 6,800-square-foot Organizational Maintenance Shop (OMS) building was completed in 1974. The 707-square-foot unheated storage building (currently being used as a fire-protection pump house for the 369th Firefighting Unit) was constructed in 1955, and the 54-square-foot potable well pump house building was constructed in 1958. Three Nike Ajax missile silos are located on the north side of the OMS building and were completed in 1954. The site is currently occupied by 2 to 3 Army and support personnel.

The Army is preparing an environmental assessment (EA) to analyze and document the environmental effects of the disposal and reuse of the property. The EA will evaluate the environmental, cultural, and socioeconomic impacts associated with the proposed disposal and reuse of the North Penn USARC, pursuant to the *National Environmental Policy Act* (NEPA) [42 U.S. Code (U.S.C.) § 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. Disposal and property reuse by the Local Redevelopment Authority for Worcester Township, PA is the Army's Preferred Alternative. The purpose of this letter is to obtain your Department's comments on this proposed transfer.

Protected Species: The U.S. Army Corps of Engineers (USACE), Mobile District is not aware of any resident protected species at the North Penn USARC, and therefore, no impacts to any federally protected species are expected to occur as a result of the Proposed Action. The U.S. Fish and Wildlife Service (USFWS) Northeast Regional website (http://www.fws.gov/northeast/angered/angered_species_listing.html) was accessed to determine if any federally-listed species occur in the vicinity of the project location. No rare, threatened, or endangered species or natural communities of concern are known to occur in the

vicinity of the project location. The small whorled pogonia (*Isotria medeoloides*), a federally threatened plant species, historically occurred in Montgomery County, but this county is not part of its current distribution. Additionally, the Pennsylvania Natural Diversity Inventory (PNDI) Project Planning Environmental Review tool on the Pennsylvania Natural Heritage Program's website (<http://www.naturalheritage.state.pa.us/Homepage.aspx>) was accessed to screen for potential impacts to species of special concern. No known impacts to threatened and endangered species and resources within the project area were identified.

Wetlands: No formal delineation of wetlands has been performed on the North Penn site, although no jurisdictional wetlands on the property are recorded in the U.S. Fish and Wildlife Service's National Wetlands Inventory (NWI). No potential wetland areas were observed during a site visit conducted in January and on-site personnel observe no standing water anytime at the site. Attachment 3 is a map from the NWI website showing the paucity of wetlands in the area.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

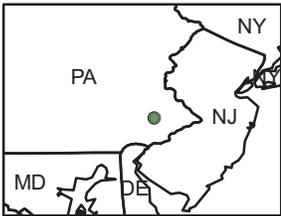
Sincerely,



Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer



Site Map



Legend

 North Penn USARC Boundary

0 250 500 750 1,000 Feet

0 100 200 300 Meters

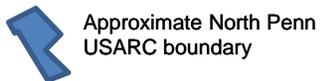
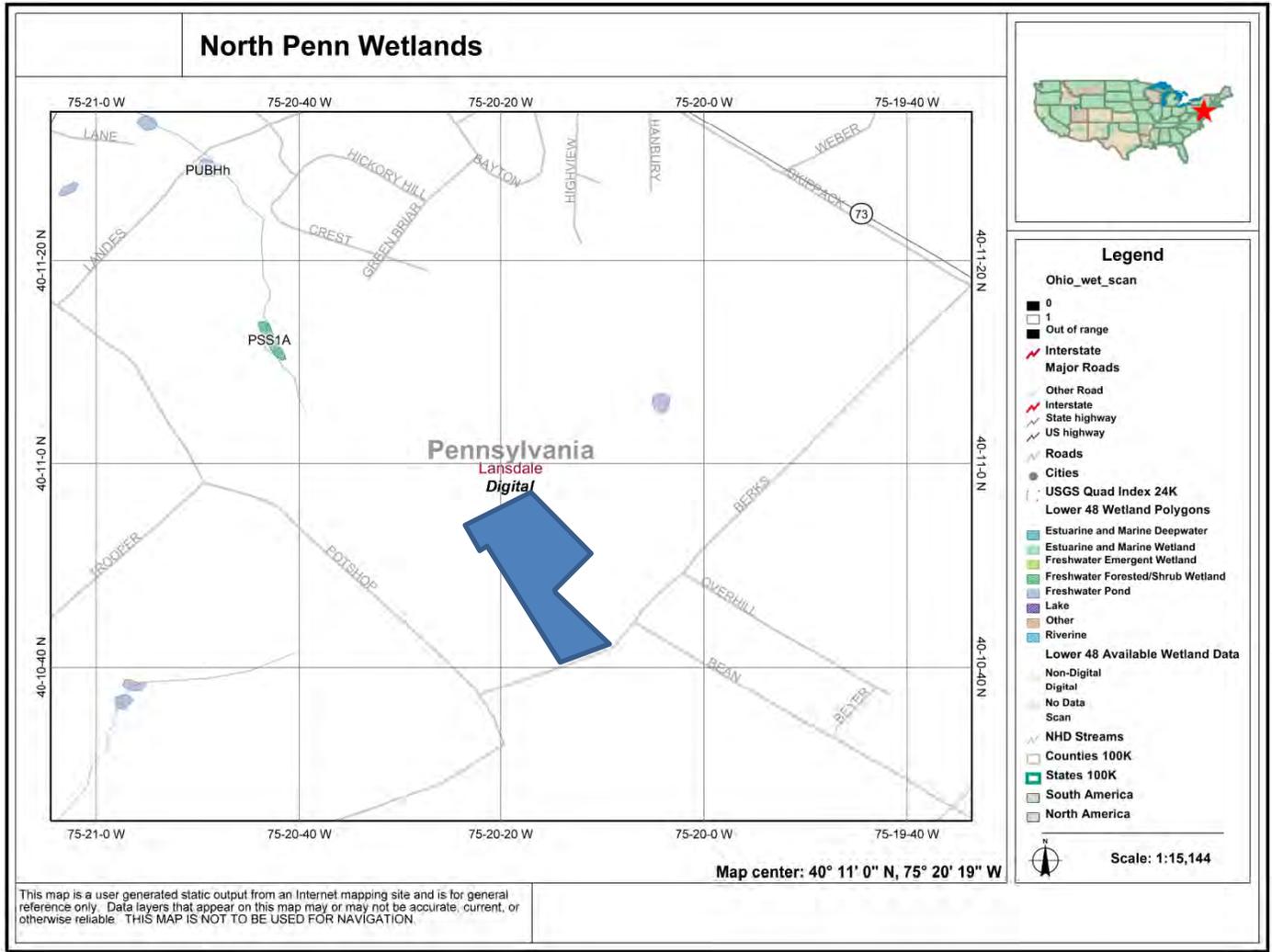


Prepared For:
U.S. Army Corps of Engineers, Mobile District

Attachment 2

North Penn United States Army Reserve Center, Norristown, PA
Aerial Photograph





USARC United States Army Reserve Center

Prepared For:
U.S. Army Corps of Engineers, Mobile District

Attachment 3
North Penn United States Army Reserve Center, Norristown, PA
Wetlands map





DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

February 19, 2010

Richard Shockey
Environmental Review Specialist
Pennsylvania Department of Conservation and Natural Resources
P.O. Box 8552
Harrisburg, PA 17105

Dear Mr. Shockey:

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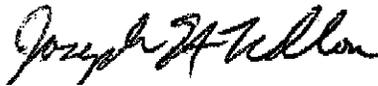
Protected Species: The U.S. Army Corps of Engineers (USACE), Mobile District is not aware of any resident protected species at the North Penn USARC, and therefore, no impacts to any federally protected species are expected to occur as a result of the Proposed Action. The U.S. Fish and Wildlife Service (USFWS) Northeast Regional website (http://www.fws.gov/northeast/endangered/endangered_species_listing.html) was accessed to determine if any federally-listed species occur in the vicinity of the project location. No rare, threatened, or endangered species or natural communities of concern are known to occur in the

vicinity of the project location. The small whorled pogonia (*Isotria medeoloides*), a federally threatened plant species, historically occurred in Montgomery County, but this county is not part of its current distribution. Additionally, the Pennsylvania Natural Diversity Inventory (PNDI) Project Planning Environmental Review tool on the Pennsylvania Natural Heritage Program's website (<http://www.naturalheritage.state.pa.us/Homepage.aspx>) was accessed to screen for potential impacts to species of special concern. No known impacts to threatened and endangered species and resources within the project area were identified.

Wetlands: No formal delineation of wetlands has been performed on the North Penn site, although no jurisdictional wetlands on the property are recorded in the U.S. Fish and Wildlife Service's National Wetlands Inventory (NWI). No potential wetland areas were observed during a site visit conducted in January and on-site personnel observe no standing water anytime at the site. Attachment 3 is a map from the NWI website showing the paucity of wetlands in the area.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,



Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

February 19, 2010

Doug Killough
Pennsylvania Game Commission
Southeast Region
448 Synder Rd
Reading, PA 19605

Dear Mr. Killough:

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the North Penn Memorial United States Army Reserve Center (North Penn USARC) in Norristown, Pennsylvania (Enclosure 1). These recommendations were approved by the President on September 23, 2005, and forwarded to Congress.

The North Penn USARC is a 19-acre parcel located at 1625 Berks Road, Norristown, Pennsylvania. The USARC contains seven permanent structures, including three former Nike Ajax missile silos (Enclosure 2). The Property was used as an administrative center and an outdoor training area. Construction of both the 45,000-square-foot administration building and the 6,800-square-foot Organizational Maintenance Shop (OMS) building was completed in 1974. The 707-square-foot unheated storage building (currently being used as a fire-protection pump house for the 369th Firefighting Unit) was constructed in 1955, and the 54-square-foot potable well pump house building was constructed in 1958. Three Nike Ajax missile silos are located on the north side of the OMS building and were completed in 1954. The site is currently occupied by 2 to 3 Army and support personnel.

The Army is preparing an environmental assessment (EA) to analyze and document the environmental effects of the disposal and reuse of the property. The EA will evaluate the environmental, cultural, and socioeconomic impacts associated with the proposed disposal and reuse of the North Penn USARC, pursuant to the *National Environmental Policy Act* (NEPA) [42 U.S. Code (U.S.C.) § 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. Disposal and property reuse by the Local Redevelopment Authority for Worcester Township, PA is the Army's Preferred Alternative. The purpose of this letter is to obtain your Department's comments on this proposed transfer.

Protected Species: The U.S. Army Corps of Engineers (USACE), Mobile District is not aware of any resident protected species at the North Penn USARC, and therefore, no impacts to any federally protected species are expected to occur as a result of the Proposed Action. The U.S. Fish and Wildlife Service (USFWS) Northeast Regional website (http://www.fws.gov/northeast/endangered/endangered_species_listing.html) was accessed to determine if any federally-listed species occur in the vicinity of the project location. No rare, threatened, or endangered species or natural communities of concern are known to occur in the

vicinity of the project location. The small whorled pogonia (*Isotria medeoloides*), a federally threatened plant species, historically occurred in Montgomery County, but this county is not part of its current distribution. Additionally, the Pennsylvania Natural Diversity Inventory (PNDI) Project Planning Environmental Review tool on the Pennsylvania Natural Heritage Program's website (<http://www.naturalheritage.state.pa.us/Homepage.aspx>) was accessed to screen for potential impacts to species of special concern. No known impacts to threatened and endangered species and resources within the project area were identified.

Wetlands: No formal delineation of wetlands has been performed on the North Penn site, although no jurisdictional wetlands on the property are recorded in the U.S. Fish and Wildlife Service's National Wetlands Inventory (NWI). No potential wetland areas were observed during a site visit conducted in January and on-site personnel observe no standing water anytime at the site. Attachment 3 is a map from the NWI website showing the paucity of wetlands in the area.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,



Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

February 19, 2010

Raymond Bednarchik
Pennsylvania Fish and Boat Commission
Southeast Regional Office
Brubaker Valley Rd and Lakeview Dr.
P.O. Box 9
Elm, PA 17521

Dear Mr. Bednarchik:

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the North Penn Memorial United States Army Reserve Center (North Penn USARC) in Norristown, Pennsylvania (Enclosure 1). These recommendations were approved by the President on September 23, 2005, and forwarded to Congress.

The North Penn USARC is a 19-acre parcel located at 1625 Berks Road, Norristown, Pennsylvania. The USAR Center contains seven permanent structures, including three former Nike Ajax missile silos (Enclosure 2). The Property was used as an administrative center and an outdoor training area. Construction of both the 45,000-square-foot administration building and the 6,800-square-foot Organizational Maintenance Shop (OMS) building was completed in 1974. The 707-square-foot unheated storage building (currently being used as a fire-protection pump house for the 369th Firefighting Unit) was constructed in 1955, and the 54-square-foot potable well pump house building was constructed in 1958. Three Nike Ajax missile silos are located on the north side of the OMS building and were completed in 1954. The site is currently occupied by 2 to 3 Army and support personnel.

The Army is preparing an environmental assessment (EA) to analyze and document the environmental effects of the disposal and reuse of the property. The EA will evaluate the environmental, cultural, and socioeconomic impacts associated with the proposed disposal and reuse of the North Penn USARC, pursuant to the *National Environmental Policy Act* (NEPA) [42 U.S. Code (U.S.C.) § 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. Disposal and property reuse by the Local Redevelopment Authority for Worcester Township, PA is the Army's Preferred Alternative. The purpose of this letter is to obtain your Department's comments on this proposed transfer.

Protected Species: The U.S. Army Corps of Engineers (USACE), Mobile District is not aware of any resident protected species at the North Penn USARC, and therefore, no impacts to any federally protected species are expected to occur as a result of the Proposed Action. The U.S. Fish and Wildlife Service (USFWS) Northeast Regional website (http://www.fws.gov/northeast/endangered/endangered_species_listing.html) was accessed to determine if any federally-listed species occur in the vicinity of the project location. No rare,

threatened, or endangered species or natural communities of concern are known to occur in the vicinity of the project location. The small whorled pogonia (*Isotria medeoloides*), a federally threatened plant species, historically occurred in Montgomery County, but this county is not part of its current distribution. Additionally, the Pennsylvania Natural Diversity Inventory (PNDI) Project Planning Environmental Review tool on the Pennsylvania Natural Heritage Program's website (<http://www.naturalheritage.state.pa.us/Homepage.aspx>) was accessed to screen for potential impacts to species of special concern. No known impacts to threatened and endangered species and resources within the project area were identified.

Wetlands: No formal delineation of wetlands has been performed on the North Penn site, although no jurisdictional wetlands on the property are recorded in the U.S. Fish and Wildlife Service's National Wetlands Inventory (NWI). No potential wetland areas were observed during a site visit conducted in January and on-site personnel observe no standing water anytime at the site. Attachment 3 is a map from the NWI website showing the paucity of wetlands in the area.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,



Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

March 9, 2010

Mr. Doug McClearen
Chief
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North street
Harrisburg, PA 17120

Dear Mr. McClearen:

The Defense Base Realignment and Closure (BRAC) Commission has recommended closure of the North Penn Memorial United States Army Reserve Center (USARC). To implement this recommendation, the Army proposes transfer of this property from Government ownership for local reuse and development after closure. Information regarding the proposed undertaking is being provided for your review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended.

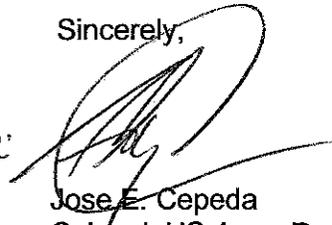
The North Penn Memorial USARC is an approximately 19-acre parcel located at 1625 Berks Road, Norristown, Montgomery County, Pennsylvania (Attachment 1). The property, which was farmland, was purchased by the U.S. Government in 1954 and consists of seven permanent structures (Attachment 2). The buildings are: 1) Main Reserve Center (Administration), built in 1974; 2) Organizational Maintenance Shop, built in 1974; 3) unheated storage building, built in 1955; 4) potable well pump house, built in 1958; and 5, 6, and 7) three Nike Ajax missile silos, built in 1954-1955. The entire 19-acre tract and all of the buildings and structures located on the tract are included in the Area of Potential Effect (APE). The property was initially used as part of the Nike Ajax Missile Systems from 1954 to 1968, after which it was reassigned to the United States Army Reserves.

A Cultural Resources Management Plan (CRMP) was prepared in 1995 and a cultural resources assessment was performed that concluded no archaeological resources exist on the property. In addition, after an evaluation of historic records and a site visit as part of the CRMP preparation, it was concluded that none of the buildings were found to meet the criteria to be eligible for inclusion in the National Register of Historic Places (NRHP). The 99th Regional Support Command (RSC) performed a cultural resources assessment in January 2010 to confirm these findings (Attachment 3), which included archival research to determine if previously recorded cultural resources exist on the site and performed a site reconnaissance to ascertain if historic properties are located within the project area. The assessment did confirm that no historic archaeological resources exist on the property due to extensive ground disturbance, a review of aerial photographs and topographic quadrangles, and a search of the Pennsylvania Historic Preservation Bureau's Cultural Resources Geographic Information System (CRGIS) database of previously recorded cultural properties. The CRGIS database identified no previously recorded archaeological sites within 1 mile of the project tract. In

addition, none of the buildings were found to meet the criteria to be eligible for inclusion in the NRHP. The North Penn Nike launch area does not possess historical associations at the national, state, or local levels of significance to be considered NRHP eligible. In addition, compared to other documented Nike facilities, North Penn does not possess a high degree of architectural integrity.

Using the above information and the most recently conducted cultural resources assessment, the Army has determined that no historic properties will be affected by the proposed undertaking as none are located with the APE. This information is being sent to you for your review pursuant to Section 106 of the National Historic Preservation Act. We welcome your comments and are requesting concurrence with our determination within 30 calendar days of receipt of this letter. We would greatly appreciate a response within 30 calendar days of receipt of this letter. Correspondence and other communication regarding this matter should be directed to Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,

FJR


Jose E. Cepeda
Colonel, US Army Reserve
Regional Engineer

Enclosures:

Enclosure 1: Location Map North Penn Memorial United States Army Reserve Center, Norristown, PA.

Enclosure 2: Aerial Photograph of the North Penn Memorial United States Army Reserve Center, Norristown, PA

Enclosure 3: Cultural Resources Assessment for BRAC Actions at the North Penn USARC, Norristown, Pennsylvania



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

February 9, 2010

Mr. James "Lee" Edwards, Jr.
Governor
Absentee-Shawnee Tribe of Indians of Oklahoma
2025 South Gordon Cooper Drive
Shawnee, OK 74801

Dear Governor Edwards:

The Defense Base Realignment and Closure (BRAC) Commission has recommended closure of the North Penn Memorial United States Army Reserve Center (USARC). To implement this recommendation, the Army proposes transfer of this property from Government ownership for local reuse and development after closure. If this action is of interest to you, we would like to begin consultation pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended at this time.

The North Penn Memorial USARC is an approximately 19-acre parcel located at 1625 Berks Road, Norristown, Pennsylvania (Attachment 1). The property, which was farmland, was purchased by the U.S. Government in 1954 and consists of seven permanent structures (Attachment 2). The property was initially used as part of the Nike Ajax Missile Systems from 1954 to 1968 after which it was reassigned to the United States Army Reserves. A Cultural Resources Management Plan was prepared in 1995 and a cultural resources assessment was performed that concluded no historic archaeological resources exist on the property. In addition, after an evaluation of historic records and a site visit it was concluded that none of the buildings were found to meet the criteria to be eligible for inclusion in the National Register of Historic Places. The 99th Regional Support Command (RSC) is performing an assessment to confirm these findings. The findings of the assessment will be included in the final consultation letter of findings.

The Army takes seriously its obligation to consult with the Tonawanda Band of Seneca. This letter is meant to determine your interest in participating in the Section 106 consultation process for this project. We will follow up this letter with a phone call to discuss the level of participation you desire going forward. At this time, we respectfully request any information you can share concerning traditional cultural properties or sacred sites located within the project area to assist us in our decision-making process. We welcome your input on this project

I would like to thank you in advance for your efforts, and would greatly appreciate a response within thirty (30) days. Correspondence and other communication regarding this matter should be directed to Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,



Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer

Enclosures:

Enclosure 1: Location Map North Penn Memorial United States Army Reserve Center,
Norristown, PA.

Enclosure 2: Aerial Photograph of the North Penn Memorial United States Army Reserve
Center, Norristown, PA



pennsylvania

DEPARTMENT OF CONSERVATION
AND NATURAL RESOURCES

BUREAU OF FORESTRY

PNDI Number: 20636

March 4, 2010

Robyn Mock
Department of the Army
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

Re: Penn North USARC
Worcester Township; Montgomery County

Dear Ms. Mock,

Thank you for submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number 20636 for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources of concern under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

NO IMPACT ANTICIPATED:

PNDI records indicate that no known occurrences of species or resources of concern under DCNR's jurisdiction occur in the vicinity of the project. Therefore, the project referenced above is not expected to impact plants, terrestrial invertebrates, natural communities, and geologic features of concern. No further coordination with DCNR is needed for this project.

This response represents the most up-to-date summary of the PNDI data files and is valid for one (1) year from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on-site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered.

Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map). If the proposed work has not changed and no additional information concerning listed species is found, the project will be cleared for PNDI requirements under this agency for an additional year.

This finding applies to impacts to DCNR only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure the U.S. Fish and Wildlife Service, PA Game Commission, and the Pennsylvania Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at www.naturalheritage.state.pa.us.

Sincerely,

Mr. Kelly L. Sitch, Environmental Review Specialist FOR Chris Firestone, Wild Plant Program Mgr.
Ph: 717-425-5370 ~ Fax: 717-772-0271 ~ [e-ksitch@state.pa.us](mailto:ksitch@state.pa.us)

conserve

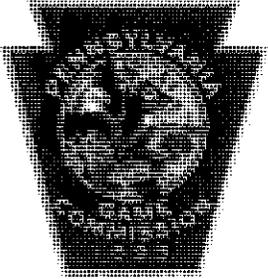
sustain

enjoy

P.O. Box 8552, Harrisburg, PA 17015-8552 717-787-3444 (fax) 717-772-0271

dcnr.state.pa.us

Printed on Recycled Paper



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA GAME COMMISSION

2001 ELMERTON AVENUE, HARRISBURG, PA 17110

*"TO MANAGE ALL WILD BIRDS, MAMMALS AND THEIR HABITATS
FOR CURRENT AND FUTURE GENERATIONS."*

March 15, 2010

Robyn Mock
99th RSC DPW
Environmental Division
5231 South Scott Plaza
Fort Dix, NJ 08640-500

Re: North Penn Memorial U. S. Army Reserve Center Disposal and Reuse of Property Project,
1625 Berks Road, Norristown, Montgomery County, PA

Dear Ms. Mock,

Thank you for submitting the North Penn Memorial U. S. Army Reserve Center Disposal and Reuse of Property Project to the Pennsylvania Natural Diversity Inventory (PNDI) for review. The Pennsylvania Game Commission (PGC) screened this project for potential impacts to species and resources of concern under PGC responsibility, which includes birds and mammals only.

No Impact Anticipated

PNDI records indicate that no known occurrences of species or resources of concern under PGC jurisdiction occur in the vicinity of the project. Therefore, the above-referenced project is not expected to impact any birds or mammals of concern, and no further coordination with the PGC is necessary for this project at this time.

This response represents the most up-to-date summary of the PNDI data files and is valid for one (1) year from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered.

Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map). If the proposed work has not changed and no additional information concerning listed species is found, the project will be cleared for PNDI requirements under this agency for an additional year.

This finding applies to impacts to birds and mammals only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure that the U.S. Fish and Wildlife Service, the PA Department of Conservation and Natural Resources, and/or the PA Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at www.naturalheritage.state.pa.us.

Sincerely,



Tracey Librandi Mumma
Division of Environmental Planning & Habitat Protection
Bureau of Wildlife Habitat Management
Phone: 717-787-4250, Extension 3614
Fax: 717-787-6957
E-mail: tlibrandi@state.pa.us

A PNHP Partner



Pennsylvania Natural Heritage Program

TLM/tlm

From: Jason Ross [mailto:JRoss@delawarenation.com]
Sent: Thursday, April 15, 2010 2:25 PM
To: Andrea Linder
Subject: RE: SGT Joyce Kilmer USARC, Edison, NJ

Hello Andrea,

Regarding the Disposal Project SGT Joyce Kilmer USARC, Edison, NJ and North Penn Memorial USARC, Norristown, PA.

The Delaware Nation's area of interest is all counties within New Jersey & Pennsylvania and they will be a consulting party on the projects.

I've attached the Delaware Nation point of contact letter as an update for your files. Also, if there are any reports on the projects. The Cultural Preservation Director, Ms. Tamara Francis would need copies of those.

If you have any questions please do not hesitate to contact us through email or by phone.

Thank you again for consulting with the Delaware Nation,

Jason Ross
Museum/Section 106 Assistant
Cultural Preservation Department
The Delaware Nation
P.O. Box 825
Anadarko, OK 73005
PH# 405) 247-2448
FAX# 405) 247-8905
www.delawarenation.com



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

April 12, 2010

Jose E. Capeda
Department of the Army
Headquarters, 99th Regional Support Command
5231 South Scott Plaza
Fort Dix, New Jersey 08640-5000

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: File No. ER 1991-3309-091-B
DOD: North Penn Memorial United
States Army Reserve Center Closure
Worcester Twp., Montgomery Co.

Dear Mr. Capeda:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

Your request does not include sufficient information. We are unable to proceed with our review for historic structures until the information on the attached form is provided.

In our opinion no archaeological investigations are necessary in this project area.

If you need further information in this matter please consult Susan Zacher at (717) 783-9920.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology &
Protection

Attachment
DCM/tmw

91-3309-091-B

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
BUREAU FOR HISTORIC PRESERVATION

INFORMATION REQUEST SHEET

(Revised 4/07)

Please submit checked items for PHMC to proceed with review.

PROJECT INITIATION

A. FUNDING/PERMITTING/LICENSING/APPROVAL PROGRAM

- 1. Contact person for federal/state/local agency, address, phone number.
- 2. Letter from federal agency initiating consultation, or a letter from federal agency authorizing an alternate agency or a consultant to initiate consultation.
- 3. Identify the Federal/State Agency and funding program or permit/license.

B. PROJECT DESCRIPTION

- 1. Narrative description of the project and related actions resulting from the project.
- 2. Proposed boundary of the project's Area of Potential Effect (APE) (remember to consider visual impacts)
- 3. Description and Justification of selection of the Area of Potential Effect
- 4. Architectural plans of existing conditions (as-built or as-found)
- 5. Preliminary architectural drawings or plans (floor plans, elevations, specifications)
- 6. Work write-ups
- 7. Plans and specifications
- 8. Site plans of existing conditions
- 9. Site plans of proposed development

C. PROJECT LOCATION

- 1. U.S.G.S. 7.5 min. series quadrangle with the **PROJECT LOCATION(S) AND LIMITS CLEARLY MARKED** using a colored pen. Please include name of the quadrangle
- 2. U.S.G.S. 7.5 min. series quadrangle with Area of Potential Effect marked (potential area of direct effect can be delineated inside area of indirect effect)
- 3. Street map (for properties in densely populated areas)
- 4. Street map showing location and historic district boundaries (if appropriate)
- 5. Street address of property
- 6. Municipality in which project is located (not mailing address location)

D. PROJECT SIZE (supply as appropriate for project)

- 1. Acreage of project area
- 2. Miles/feet of project and right-of-way width
- 3. Extent and nature of ground disturbing activities (i.e. grading, trenching, foundation excavation)

(over)

E. PHOTOGRAPHS (no Polaroids, or photocopies. Clear, high resolution digital images accepted.)

- 1. Exterior of building(s)/structures in project area
- 2. Interior of building(s) in project area
- 3. Interior of building(s) illustrating the proposed work areas/features
- 4. Buildings, streetscape, setting of features in Area of Potential Effect (APE)
- 5. Views of project site
- 6. Other _____

PUBLIC PARTICIPATION

- 1. Measures which will be/or have been taken to identify consulting parties.
- 2. List of proposed consulting parties.
- 3. Measures which will be/or have been taken to notify and involve the public.

RESOURCE IDENTIFICATION, EVALUATION AND PROJECT EFFECT

A. CULTURAL RESOURCE IDENTIFICATION

- 1. Description of methodology used for identification and sources examined.
- 2. Plan proposed for identification of historical (including historic districts, buildings, structures, objects) and archaeological resources and proposed methodology to be used.
- 3. Pennsylvania Historic Resource Survey form(s) for all properties 50 years or older and potentially eligible for the National Register identified in the APE. (See our website at: www.phmc.state.pa.us click on "Preservation Programs" and then "Forms")
- 4. Historical background/context report/information for historic resources identified.

B. EFFECTS

- 1. How will the project affect building(s) over 50 years old?
- 2. National Register listed/eligible property(s) exists in project area. How will the project affect this historic property(s)?

C. Other: _____

May 7, 2010

Mr. Douglas C. McLearn, Chief
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: File No. ER 1991-3309-091-B
DOD: North Penn Memorial United
States Army Reserve Center Closure
Worcester Twp., Montgomery Co.

Dear Mr. McLearn:

Per your letter dated 12 April 2010, please find enclosed the Pennsylvania Historic Resource Survey Form for all properties 50 years or older at the North Penn Memorial United States Army Reserve Center, Norristown, Pennsylvania.

If you have any questions or need further information, please contact me at 210-533-5100 or cyndib@ageiss.com.

Sincerely,

A handwritten signature in black ink that reads "Cynthia D. Bell".

Cynthia D. Bell
Project Manager

Enclosure: Pennsylvania Historic Resource Survey Form with Photographs



Historic Resource Survey Form

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
Bureau for Historic Preservation

Key # _____
ER# <u>1991-33-09-091-B</u>

Name, Location and Ownership *(Items 1-6; see Instructions, page 4)*

HISTORIC NAME Worcester Nike Facility/PH-91
 CURRENT/Common NAME North Penn USARC
 STREET ADDRESS 1625 Berks Road ZIP 19490
 LOCATION Worcester Township
 MUNICIPALITY Worcester COUNTY Montgomery
 TAX PARCEL #/YEAR 67-00-00316-00-4 USGS QUAD Lansdale
 OWNERSHIP Private
 Public/Local Public/County Public/State Public/Federal
 OWNER NAME/ADDRESS Department of Defense
 CATEGORY OF PROPERTY Building Site Structure Object District
 TOTAL NUMBER OF RESOURCES 3

Function *(Items 7-8; see Instructions, pages 4-6)*

Historic Function	Subcategory	Particular Type
<u>Defense</u>	<u>Air Defense</u>	<u>Missile Silo</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
Current Function	Subcategory	Particular Type
<u>Abandoned</u>	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Architectural/Property Information *(Items 9-14; see Instructions, pages 6-7)*

ARCHITECTURAL CLASSIFICATION

No Style _____

EXTERIOR MATERIALS and STRUCTURAL SYSTEM

Foundation Reinforced Concrete Bunker _____
 Walls Reinforced Concrete _____
 Roof Same _____
 Other _____
 Structural System Same _____

WIDTH n/a (feet) or n/a (# bays) DEPTH n/a (feet) or n/a (# rooms) STORIES/HEIGHT 1

Property Features (Items 15-17; see Instructions, pages 7-8)

Setting rural

Ancillary Features

unheated storage building _____

well pump house _____

Acreage 19 (round to nearest tenth)

Historical Information (Items 18-21; see Instructions, page 8)

Year Construction Began 1954 Circa Year Completed 1958 Circa

Date of Major Additions, Alterations 1973 Circa _____ Circa _____ Circa

Basis for Dating Documentary Physical

Explain De-activation of Nike sites; demolition of support structures.

Cultural/Ethnic Affiliation(s) n/a

Associated Individual(s) n/a

Associated Event(s) Cold War; air defense of Philadelphia

Architect(s) USACE, Philadelphia District with contractors

Builder(s) USACE, Philadelphia District with contractors

Submission Information (Items 22-23; see Instructions, page 8)

Previous Survey/Determinations n/a

Threats None Neglect Public Development Private Development Other

Explain _____

This submission is related to a non-profit grant application business tax incentive

NHPA/PA History Code Project Review other

Preparer Information (Items 24-30; see Instructions, page 9)

Name & Title Patricia Stallings

Date Prepared March 3, 2010

Project Name North Penn USARC

Organization/Company Brockington and Associates, Inc.

Mailing Address 6611 Bay Circle, Suite 220, Norcross, GA 30071

Phone 678-638-4126

Email patriciastallings@brockington.org

National Register Evaluation (Item 31; see Instructions, page 9)
(To be completed by Survey Director, Agency Consultant, or for Project Reviews ONLY.)

- Not Eligible (due to lack of significance and/or lack of integrity)
- Eligible Area(s) of Significance _____
Criteria Considerations _____ Period of Significance _____
- Contributes to Potential or Eligible District District Name _____

Bibliography (Item 32; cite major references consulted. Attach additional page if needed. See Instructions, page 9.)

Bender, Donald E.

2004 The Nike Missile System: A Concise Historical Overview. Internet online at <http://alpha.fdu.edu/~bender/N-view.html>.

Cagle, Mary T.

1959 Historical Monograph: Development, Production, and Deployment of the Nike Ajax Guided Missile System, 1945-1959. U.S. Army Ordnance Missile Command, Redstone Arsenal, Alabama.

Lonnquest, John C. and David F. Winkler

1996 To Defend and Deter: The Legacy of the United States Cold War Missile Program. Department of Defense Legacy Resource Management Program.

Snyder, Frank E. and Brian H. Guss

1974 The District: A History of the Philadelphia District U.S. Army Corps of Engineers, 1866-1971. Prepared for and published by the U.S. Army Corps of Engineers, Philadelphia District.

U.S. Army Corps of Engineers, Fort Worth District

n.d. Looking Between Trinity and the Wall: Challenges of Cold War Cultural Resources. Internet online. <Http://www.swf.usace.army.mil/pubdata/enviro/cultural/trinity.asp>.

Additional Information

The following must be submitted with form. Check the appropriate box as each piece is completed and attach to form with paperclip.

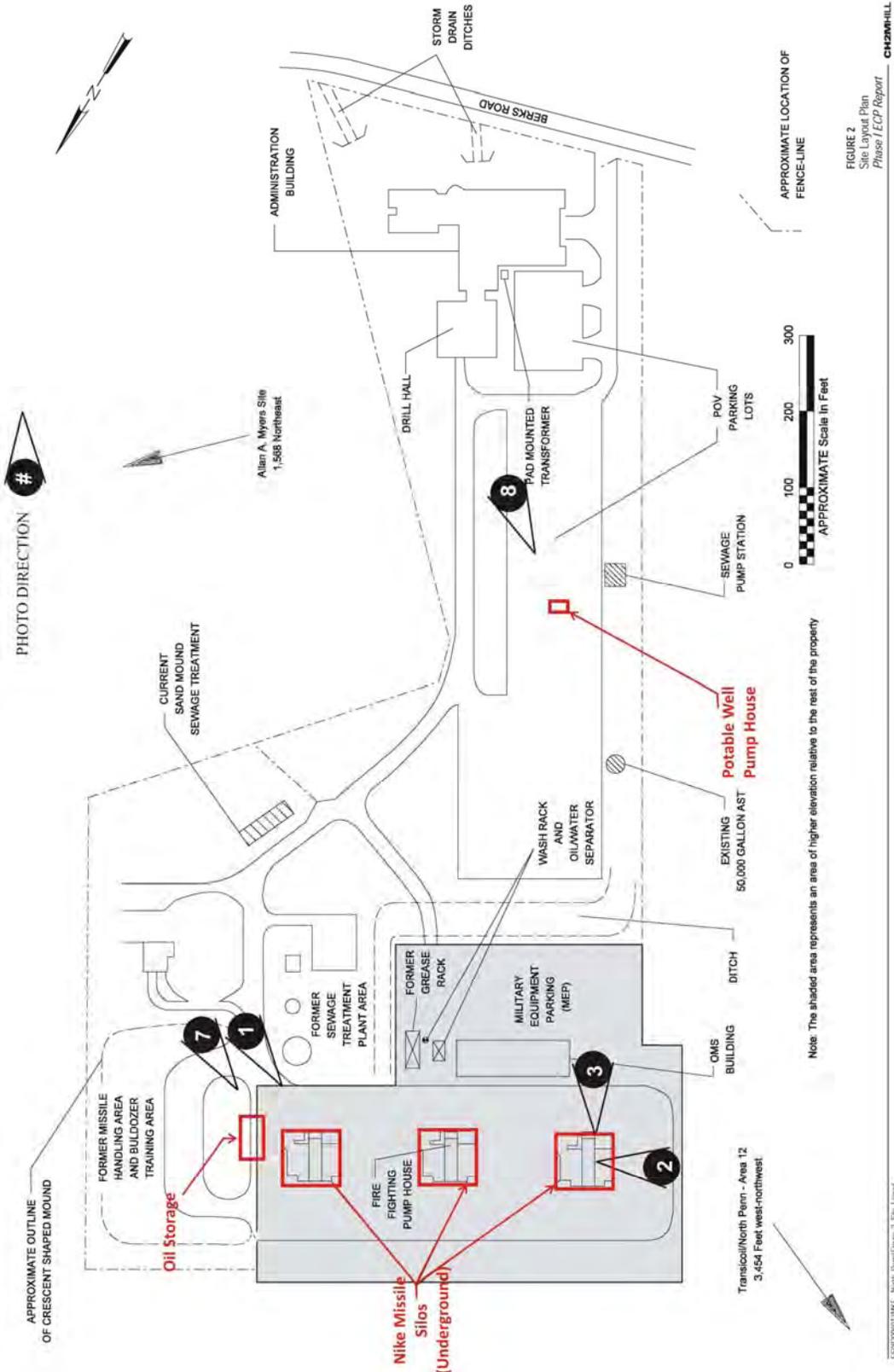
- Narrative Sheets—Description/Integrity and History/Significance (See Instructions, pages 13-14)
- Current Photos (See Instructions, page 10)
- Photo List (See Instructions, page 11)
- Site Map (sketch site map on 8.5x11 page; include North arrow, approximate scale; label all resources, street names, and geographic features; show exterior photo locations; See Instructions, page 11)
- Floor Plan (sketch main building plans on 8.5x11 page; include North arrow, scale bar or length/width dimensions; label rooms; show interior photo locations; See Instructions, page 11)
- USGS Map (submit original, photocopy, or download from TopoZone.com; See Instructions, page 12)

Send Completed Form and Additional Information to:

National Register Program
Bureau for Historic Preservation/PHMC
Keystone Bldg., 2nd Floor
400 North St.
Harrisburg, PA 17120-0093

Site Plan (Item 34)

See page 11 of the Instructions for more information regarding the site plan. Create a sketch of the property, showing the footprint of all buildings, structures, landscape features, streets, etc. Label all resources and streets. Include a North arrow and a scale bar (note if scale is approximate). This sheet may be used to sketch a plan or another map/plan may be substituted.

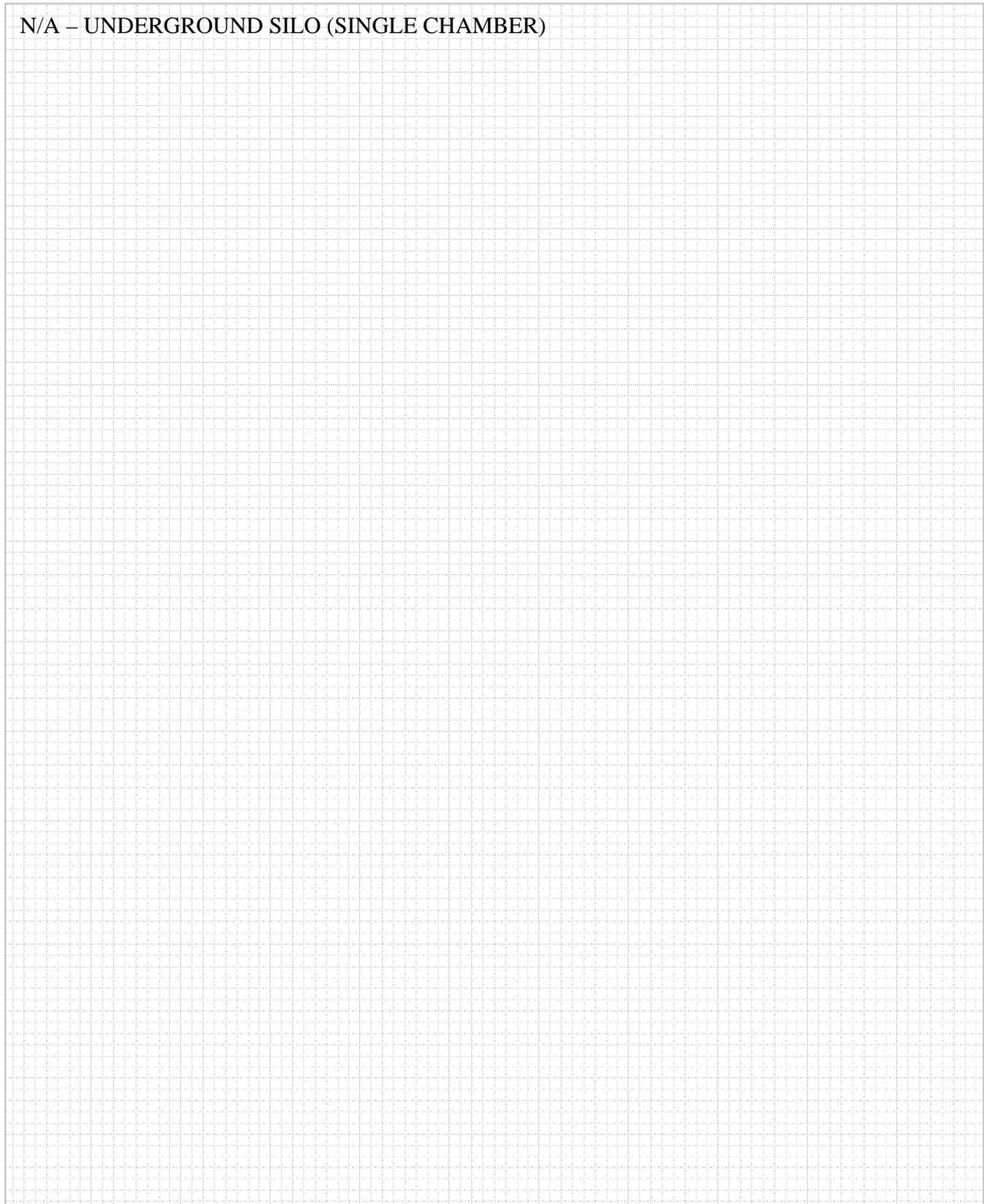


Floor Plan (Item 35)

See page 11 of the Instructions for more information regarding the floor plan. Provide a floor plan for the primary buildings, showing all additions. Label rooms and note important features. Note the date of additions. Include a North arrow and a scale bar (note if scale is approximate) or indicate width/depth dimensions. This sheet may be used to sketch a floor plan or another map/plan may be substituted.

Key # _____
ER# 1991-33-09-091-B

N/A – UNDERGROUND SILO (SINGLE CHAMBER)



Physical Description and Integrity (Item 38)

Provide a current description of the overall setting, landscape, and resources of the property. See page 13 of the Instructions for detailed directions. Continue on additional sheets as needed. Suggested outline for organizing this section:

- Introduction [summarize the property, stating type(s) of resource(s) and function(s)]
- Setting [describe geographic location, streetscapes, natural/man-made landscape features, signage, etc.]
- Exterior materials, style, and features [describe the exterior of main buildings/resources]
- Interior materials, style, and features [describe the interior of main buildings/resources]
- Outbuildings/Landscape [describe briefly additional outbuildings/landscape features found on property, substitute Building Complex Form if preferred; See Instructions, page 18]
- Boundaries [explain how/why boundaries chosen, such as historic legal parcel, visual natural features such as tree lines, alley separating modern construction, etc.]
- Integrity [summarize changes to the property and assess how the changes impact its ability to convey significance]

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below; “unprotect” the document for this section, or prepare the “Physical Description and Integrity” narrative as a separate document.)

There are few remaining components of the Worcester/Center Square (PH-91) Nike Missile facility. Those that have survived include the underground storage chambers and elevators, an unheated storage building and a well pump house. Constructed in 1955, the unheated storage building (also identified in documents as a fire protection pump house) is located northeast of the Organizational Maintenance Shop (OMS), near the underground Nike Missile chambers. It is a one-story steel and masonry building. The well pump house does date to the late Nike occupancy of the property but represents a simple utilitarian structure. Constructed in 1958, it is located in the center of the North Penn property, and consists of a 54-square foot brick and steel structure covered in modern vinyl siding.

Both buildings were constructed as support structures within the larger Nike Missile complex. Without the other ancillary structures, these buildings have lost their context and can no longer convey their historical associations. In addition, they do not express a particular building style or method.

The Nike-Ajax Missile silos are located behind (north of) the OMS building. These underground silos, or vaults, are lined with steel-reinforced concrete, and are accessed by both a stairwell and a vertical hatch. During a January 12, 2010 site visit, the interior of the western most silo was accessed and observed. The chamber contained the elevator shaft and the control area, but few pieces of original equipment remained. The elevator shaft was filled with water and could not be visually inspected. All of the interior mechanical equipment has been removed.

Based on historical monographs describing the development and deployment of the Nike-Ajax missile, along with a comparison of previously recorded properties in HAER records, the Worcester/Center Square (PH-91) Nike-Ajax launch facility does not retain its architectural or engineering integrity. Similarly, based on Department of Defense contexts for determining significant historical associations, the Worcester Nike facility does not possess, National, State, or Local significance with events or people. It was one of twelve such bases around Philadelphia and one of hundreds constructed across the United States.

History and Significance (Item 39)

Provide an overview of the history of the property and its various resources. Do not substitute deeds, chapters from local history books, or newspaper articles. See page 14 of the Instructions for detailed directions. Continue on additional sheets as needed.

Suggested outline for organizing this section:

- History [Summarize the evolution of the property from origin to present]
- Significance [Explain why the property is important]
- Context and Comparisons [Describe briefly similar properties in the area, and explain how this property compares]

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below; “unprotect” the document for this section, or prepare the “History and Significance” narrative as a separate document.)

NIKE MISSILE BASE OVERVIEW

Constructed during the early Cold War, Nike Missile bases, along with Strategic Air Command bomber bases and missile silos, were the primary military installations that symbolized the United States’ Cold War military strategy of using technology and nuclear weapons to protect itself from the larger conventional forces of the Soviet Union. During the 1950s and 1960s, the Nike bases were tasked with the defense of major American urban and industrial areas from Soviet nuclear bomb attack. At its peak, the Army operated over 200 Nike batteries in the United States. With the introduction of intercontinental ballistic missiles in the late 1950s and the Anti-Ballistic Missile Treaty in the 1970s, the U.S. moved away from anti-aircraft defense and relied on the doctrine of Mutually Assured Destruction and the accuracy of its multiple independently targetable reentry vehicle nuclear weapons to maintain a balance of power with the Soviets for the remainder of the Cold War.

Between 1954 and 1958, the U.S. deployed some 300 Nike-Ajax batteries across the country to protect large urban cities, industrial centers, and military installations. The North Penn USARC contains the PH-91 (Worcester/Center Square) launch site, which was one of twelve batteries designed to protect the City of Philadelphia. The missiles were stored in underground reinforced concrete bunkers, which were equipped with elevators to raise them into firing position. The USACE emphasized speed during construction “at premium plus overtime.” The sites were initially manned by the Air Defense Artillery, and later manned by the National Guard. Shortly after its construction, the U.S. began converting Nike-Ajax bases to accommodate the longer-range Nike-Hercules. Since the Nike-Hercules had a longer-range, it required fewer bases and selected Ajax batteries were deactivated, including PH-91.

Each Nike facility had three components: an administrative area, an integrated fire control area, and the launch area. The administrative area, generally collocated with either the launch or fire control component, consisted of a barracks, mess hall, and other office or supply structures. The IFC contained tracking radars, power plant, and trailers with radar control and a maintenance facility. The initial Nike batteries had above ground launchers:

This quickly changed as land restrictions forced the Army to construct space-saving underground magazines. Each magazine had an elevator that lifted the missile to the surface in a horizontal position. Once above ground, the missile could be pushed manually along a railing to a launcher placed parallel to the elevator. Typically, four launchers sat atop the magazine. Near the launchers, a trailer housed the launch control officer and the controls he operated to launch missiles. In addition to the launch control trailer, the launch area contained a generator building with three diesel generators, frequency converters, and missile assembly and maintenance structures.

WORCESTER/CENTER SQUARE NIKE MISSILE FACILITY

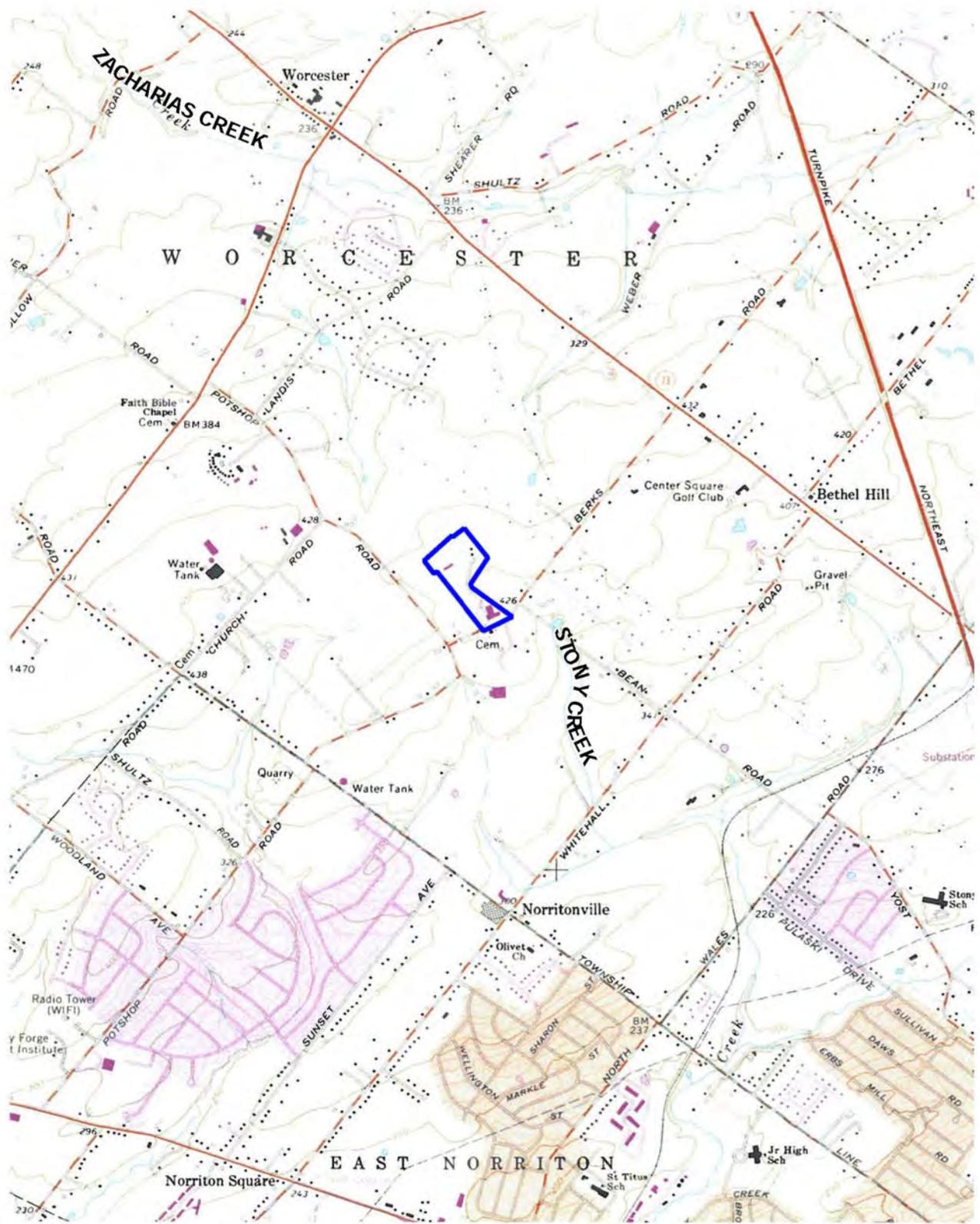
The North Penn USARC is located at 1625 Berks Road in Norristown, Worcester Township, Montgomery County, Pennsylvania. The area is rural and zoned agricultural, with modern and mid-twentieth century residences along Berks and Potshop Road. The USARC Center consists of approximately 19 acres of land with seven permanent structures, including three former Nike Ajax missile silos.

Historic aerial photographs and topographic maps dating as early as 1942 show the North Penn USARC property as open fields or used for agricultural production prior to U.S. Government ownership. Those maps, located in Appendix A, show no pre-military structures present on the property. The U.S. Government purchased the property in 1954 and subsequently constructed a Nike Ajax missile launch facility. The property functioned as a Nike Ajax missile launch facility until 1964, after which it was converted to a USARC Center.

Key # _____
ER# 1991-33-09-091-B

When it served as a Nike Missile launch facility, the property contained other buildings, including a barracks, a bachelors' officers quarters (BOQ), a missile assembly and test building, a generator building, a paint shed, an acid storage shed, and a chemical storage shed. These buildings were located around the northeastern portion of the property, and were demolished circa 1973-1974. As of January 2010, the only remaining architectural elements from the Nike Missile period include the underground storage silos, an underground sewage treatment plant, an unheated storage building, and a well pump house.

Because of modernization of the Nike missile from the Ajax to Hercules variant, the property no longer functioned as a launch facility after 1964. At that time, it was transferred over to the U.S. Army Reserve as a training site. Construction of the current USARC administration building and the Organizational Maintenance Shop was completed in 1974.



N ^ EDR INQUIRY# 1714247.238 TARGET QUAD: LANSDALE PhotoRevised: 1966-1983 Series: 7.5' Scale: 1:24,000

Location map for the North Penn Nike Missile Launch Facility on USGS Lansdale topographic quadrangle.



Photo 1. Nike Missile Silos, facing north.



Photo 2. Nike Missile Silos, facing east (Oil Storage Building in background).



Photo 3. Nike Missile Silos, elevator doors, facing north.



Photo 4. Nike Missile Silos, interior bay, facing north.



Photo 5. Nike Missile Silos, interior bay, facing east.



Photo 6. Nike Missile Silos, missile elevator shaft equipment.



Photo 7. Nike Missile launch facility, oil storage building, facing north.



Photo 8. Nike Missile launch facility, potable well pump house, facing north.



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

May 21, 2010

Cynthia D. Bell
AGEISS Inc.
1202 Bergen Parkway, Suite 310
Evergreen, CO 80439

(T) EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 91-3309-091-C
DOD: North Penn Memorial United State Army Reserve Center
Closure, Worcester Township, Montgomery County, Pennsylvania

Dear Ms. Bell:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999 and 2004. These regulations require consideration of the project's potential effect upon both historic and archaeological resources.

Thank you for supplying the additional information we request to complete our review of the National Register eligibility of the following property. In our opinion, this property is not eligible for the National Register of Historic Places due to a loss of integrity of design, workmanship and materials.

Worcester Nike Facility/PH-91, 1625 Berks Road, Worcester Township,
Montgomery County

Therefore, based on the available information, there are no National Register eligible or listed historic buildings, structures, districts, or objects in the area of this proposed project.

If you need further information in this matter please consult Susan Zacher at (717) 783-9920.

Sincerely,

Andrea L. MacDonald, Chief
Division of Preservation Services

AM/smz

AGEISS Inc.
5225 Deerfield Park CT, NE
Olympia, WA 98516

RECORD OF CONVERSATION

Separate Conversation with: Bonnie Dershem	Date: 10 May 2010
	Time: 0930
Company/Agency: USFWS, Pennsylvania Field Office	Project No.: W91278-06-D-0018 Task order 12C
	DCC No.:
Address: State College, Pennsylvania	
Phone Number: (814)234-4090	
Personnel Present: Wendy Arjo	

SUBJECT: USFWS RESPONSE LETTER FOR NORTH PENN EA

SUMMARY

The 99th RSC DPW received a response letter from the USFWS dated 22 April 2010, concerning the disposal and reuse of the North Penn Memorial U.S. Army Reserve in Norristown, PA. The letter stated that the project occurred in the known range of the federally threatened bog turtle. USFWS requested that wetlands be determined in the area and within 300 feet of the project area to identify potential bog turtle habitat. It was unclear from the letter if the determination needed to be in the form of a wetlands determination field investigation or since we did not identify any wetlands through mapping if we had completed our investigation. Dr. Arjo contacted Ms. Dershem (per the direction of the letter) to inquire on the wetlands information. She asked Ms. Dershem if a wetlands delineation was necessary since the NWI and PNDI did not identify wetlands in the area. Ms. Dershem said that the letter states that it is not necessary to conduct a delineation (the letter is not clear here) since we did not identify wetlands. I further inquired if she would like a copy of the PNDI to show that there are no wetlands in the area. She said "No, please I do not need any more information". She said the letter we sent is therefore our letter of consultation with the USFWS.

Wendy M. Arjo

10 MAY 2010

DATE

AGEISS Inc.
5225 Deerfield Park CT, NE
Olympia, WA 98516

RECORD OF CONVERSATION

Separate Conversation with: Officer Raymond
Bednarchik

Date: 18 May 2010

Time: 1015

Project No.: W91278-06-D-0018 Task order 12C

Company/Agency: Pennsylvania Fish and Boat
Commission

DCC No.:

Address: Elm, Pennsylvania

Phone Number: (711)626-0228

Personnel Present: Wendy Arjo

SUBJECT: PAFBC FOLLOW-UP CALL FOR NORTH PENN EA

SUMMARY

By 18 May 2010, the Army had not received a response from the Pennsylvania Fish and Boat Commission on the disposal and reuse of the North Penn Army Reserve Center. I contacted Officer Bednarchik with the agency to inquire on any concerns the agency may have concerning the reuse. Officer Bednarchik reviewed the documentation we sent him and commented that the agency has no concerns with the reuse since the property is devoid of waterways.

Wendy M. Arjo

18 MAY 2010

DATE

Tribal Consultation Actions Regarding the North Penn USARC

Information Compiled by AGEISS Inc., Andrea Linder

Date Initiated: March 29, 2010

Current as of: April 22, 2010

Group Name	Date	Correspondance
7 Tribes*	17-Feb-10	Scoping letter sent to tribes.
1) Absentee-Shawnee Tribe of Indians of Oklahoma	6-Apr-10	Called and the Secretary stated that James "Lee" Edwards, Jr. is no longer the Governor of the Tribe. His replacement is George Blanchard. Left a message on his voicemail asking for a call back to inform us if his tribe is interested in participating in the Section 106 process, aware of any TCPs in the area, or would like a copy of the EA once it becomes available.
	12-Apr-10	Spoke to Mr. Blanchard and he stated due to re-elections coming up and the work load of his office, the Tribe is not participating in the Section 106 process for this project. He would like to remain on the mailing list for future projects.
	6-Apr-10	Spoke to Jason Ross and he was unsure if Ms. Tamara Francis, the Cultural Preservation Director, was interested in participating in the Section 106 Process. Requested an email be sent with the original letter and will get back to us at the end of the week. We did receive an email from Mr. Ross on February 24, 2010 notifying us of the change in President and Tribe Name and they did receive the original letter. To date, no comments have been received. Email sent on April 6, 2010 with the original letter.
2) The Delaware Nation	9-Apr-10	Left a message for Mr. Ross stating to please call back to let us know the Tribe's interest in participating in the Section 106 Process
	15-Apr-10	Received an email from Mr. Ross stating the Tribe's interest in participating in the Section 106 process.
	6-Apr-10	The phone number is no longer in service. www.whitepages.com had it listed as (716) 337-4270. Spoke to Anita Thompson, Administrative Assistant, who stated Chief Vernon Isaac passed away. His replacement is Chief Clint Halstown. She requested I email the original letter and she will forward it on to the Chief. I received permission to call back at the end of the week to see if they are interested in participating in the Section 106 Process. Emailed the letter on April 6, 2010.
3) Cayuga Nation of Indians	12-Apr-10	Spoke to Ms. Thompson who stated Chief Halstown was not in the office today, but she did pass along the letter to him last week. He has not stated to her whether they are interested in participating in the Section 106 process. I informed her to let the Chief know he could let us know if they are interested in participating in the Section 106 process.
	8-Apr-10	Left a message on the generic voicemail asking for a call back to inform us if the tribe is interested in participating in the Section 106 process, aware of any TCPs in the area, or would like a copy of the EA once it becomes available.
4) Onondaga Indian Nation	12-Apr-10	Left a message on the generic voicemail asking for a call back to inform us if the tribe is interested in participating in the Section 106 process, aware of any TCPs in the area, or would like a copy of the EA once it becomes available.
	8-Apr-10	Left a message on the generic voicemail asking for a call back to inform us if the tribe is interested in participating in the Section 106 process, aware of any TCPs in the area, or would like a copy of the EA once it becomes available.
5) Oneida Indian Nation	12-Apr-10	Left a message on the generic voicemail asking for a call back to inform us if the tribe is interested in participating in the Section 106 process, aware of any TCPs in the area, or would like a copy of the EA once it becomes available.
	8-Apr-10	The Secretary stated that Hilda Smoke is no longer the Chief. She didn't know who the replacement was. She transferred me to the Tribal Council's phone # and I left a message on the generic voicemail asking for a call back to inform us if the tribe is interested in participating in the Section 106 process, aware of any TCPs in the area, or would like a copy of the EA once it becomes available.
6) Akwesasne Mohawk Nation	12-Apr-10	The Tribal Council's secretary transferred me to the THPO, Mr. Arnold Printup, who stated the project didn't sound familiar and requested another copy of the letter. Emailed him the letter on 4-12-10 requesting he let us know of the tribe's interest in participating in the Section 106 process.
	8-Apr-10	Left a message on the generic voicemail asking for a call back to inform us if the tribe is interested in participating in the Section 106 process, aware of any TCPs in the area, or would like a copy of the EA once it becomes available.
7) Tonawanda Band of Seneca	12-Apr-10	Spoke to the Secretary and left information regarding the project and to let the necessary parties know they can contact us if they are interested in participating in the Section 106 process. Apparently, Chief Emerson Webster is not active in the decision making process.

* 1) Absentee-Shawnee Tribe of Indians of Oklahoma; 2) The Delaware Nation; 3) Cayuga Nation of Indians; 4) Onondaga Indian Nation; 5) Oneida Indian Nation; 6) Akwesasne Mohawk Nation; and 7) Tonawanda Band of Seneca

KEY:
Interested in Participating in Section 106 Process and/or wants a copy of the EA
NOT Interested in Participating in Section 106 Process and/or No Concerns
Left messages and did not hear back from the THPO and/or the Tribe

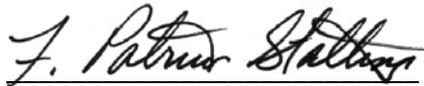
APPENDIX D. CULTURAL RESOURCES ASSESSMENT

As part of this environmental assessment, Brockington and Associates, Inc. conducted a cultural resources assessment at the North Penn Memorial United States Army Reserve Center. This appendix contains the results of that assessment.

**CULTURAL RESOURCES ASSESSMENT for
BASE REALIGNMENT AND CLOSURE (BRAC) ACTIONS at the
NORTH PENN U.S. ARMY RESERVE CENTER (PA139)
NORRISTOWN, PENNSYLVANIA**

Prepared for:
AGEISS Inc.
Contract W91278-06-D0018
Task Order No. 0012

Prepared by:

A handwritten signature in black ink, reading "Patricia Stallings". The signature is written in a cursive style and is positioned above a horizontal line.

Patricia Stallings
Senior Historian

March 3, 2010
Brockington and Associates, Inc.
Norcross, Georgia

EXECUTIVE SUMMARY

In January 2010, Brockington and Associates, Inc. completed a cultural resources assessment of the North Penn United States Army Reserve Center (USARC) in Worcester Township, Pennsylvania for proposed Base Realignment and Closure (BRAC) actions. The work was conducted to meet requirements as outlined in Section 106 of the National Historic Preservation Act (NHPA) in order to prepare National Environmental Policy Act (NEPA) documentation. This work was also designed to provide information to the U.S. Army so that it can determine if historic properties will be affected by the proposed undertaking, specifically the legal transfer of the North Penn USARC property to a non-federal entity.

In conducting this work, we developed an Area of Potential Effect (APE) consistent with the proposed action. The APE was limited to the current legal boundary and all real property. Prior to the field assessment, we conducted a thorough literature review to identify previously recorded archaeological sites and historic structures within, or adjacent to, the USARC property. There are no previously recorded archaeological sites or historic structures on the USARC property.

No systematic archaeological survey has been conducted on the North Penn USARC property. However, the literature review revealed substantial ground disturbance through the construction and demolition of buildings and parking lots during the Cold War period when the property was used as a Nike Missile launch area. Because of the extent and pattern of these disturbances, the potential for identifying intact cultural deposits is low. Therefore, we do not recommend further archaeological consideration of the property.

In addition, we evaluated five buildings or structures located on the North Penn USARC property. The Administration and OMS buildings, were constructed during the 1970s and do not possess significant historical associations that would render them eligible for inclusion in the NRHP. We also evaluated an unheated storage building and well pump house that were constructed in the late 1950s. Both were evaluated for architectural and historical significance and neither is recommended eligible for the NRHP. The remaining structures on the North Penn USARC property are three underground Nike Missile silos. These silos do not possess significant historical associations with the Cold War. Furthermore, they do not retain sufficient architectural integrity to be considered eligible for the NRHP. Therefore, it is our opinion that the proposed BRAC actions will not adversely affect historic properties.

1.0 INTRODUCTION and SCOPE OF WORK

On January 7, 2010, Brockington and Associates, Inc. contracted with AGEISS Inc. to conduct a cultural resources assessment of the North Penn United States Army Reserve Center (USARC) for proposed Base Realignment and Closure (BRAC) actions. Brockington conducted all contracted objectives of this task order to meet requirements as outlined in Section 106 of the National Historic Preservation Act (NHPA) in order to prepare National Environmental Policy Act (NEPA) documentation to proceed with the proposed action in a manner consistent with the requirements of the BRAC recommendation. Section 106 of the NHPA requires Federal agencies to consider effects to historic properties prior to an undertaking. The undertaking in this case is the legal transfer of the North Penn USARC property to a non-federal entity (Worcester Township).

Contracted work items for this project included:

1. Conduct archival research to determine the presence of previously recorded cultural resources.
2. Conduct a site reconnaissance to ascertain if historic properties (i.e. those listed on or eligible for the National Register of Historic Places [NRHP]) are located within the Area of Potential Effect (APE), and if those properties may be adversely affected by plans to transfer the USARC; and
3. Prepare a report summarizing the results and recommendations so that it may be incorporated into NEPA documentation.

This work was also conducted to provide information to the U.S. Army so that it can determine if historic properties will be affected by the proposed undertaking. This work was conducted in accordance with the “Project Documentation” standards as outlined in pages 8-10 in Guidelines for Archaeological Investigations in Pennsylvania (BHP 2008).

This letter report is organized as follows:

- 1.0 Introduction and Scope of Work
- 2.0 Literature Review
- 3.0 Property History and Proposed Use
- 4.0 Cultural Resources Reconnaissance and Evaluation
- 5.0 References

Appendix A: Maps

Appendix B: Photographs

2.0 LITERATURE REVIEW

Prior to and concurrent with our field assessment, we conducted a thorough literature review of materials related to the North Penn USARC. The purpose of this research was to identify previously recorded archaeological sites and historic structures within, or adjacent to, the project tract and to evaluate site types and landscapes in the vicinity to better understand the potential for cultural resources in the project area (Appendix A, Figures A-1 and A- 2).

Importantly, we reviewed all relevant USARC documentation provided by AGEISS. This documentation included the following:

- April 2007, Final Environmental Conditions of Property (ECP) Report
- September 2009, Draft USAR 99th Regional Support Command (RSC), Integrated Cultural Resources Management Plan (ICRMP)
- Final Report and Recommendations of the North Penn USARC Local Redevelopment Authority (LRA)
- Description of Proposed Action and Alternatives (LRA)

Based on the U.S. Army's proposed transfer of the property, we limited the APE to the legal property boundary and the existing buildings.

In addition to reviewing the materials provided by AGEISS, we searched the Pennsylvania Historic Preservation Bureau's Cultural Resources Geographic Information System (CRGIS) database of previously recorded cultural properties. The CRGIS database identified no previously recorded archaeological sites or NRHP-listed properties on or within 1.0 miles of the project tract. The Peter Wentz farmstead, an NRHP-listed property and museum operated by Montgomery County, is located approximately 1.2 miles away.

There were seven (7) architectural properties recorded through a county survey within 1.0 miles of the North Penn USARC (Figure A-3). The nearest resource to the project tract was CRGIS Key #091579, an 1840 Gothic Revival house located 0.4 miles east of the tract on Bean Road, and not within the viewshed of the North Penn USARC.

We also reviewed historic topographic quadrangles, as well as historic aerial photography. These materials were available for download at the Penn Pilot Project, with lower resolution images and project area overlays available in the 2007 ECP Report. Copies of selected quadrangles and aerials are provided in Appendix A, Figures 4-11. The demolition plans for the majority of above ground structures associated with the Nike Missile battery in 1972 are provided in Figure A-12.

3.0. PROPERTY HISTORY and PROPOSED USE

3.1 PROPERTY HISTORY

The North Penn USARC is located at 1625 Berks Road in Norristown, Worcester Township, Montgomery County, Pennsylvania (Figure A-1). The area is rural and zoned agricultural, with modern and mid-twentieth century residences along Berks and Potshop Road. The USAR Center consists of approximately 19 acres of land with seven permanent structures, including three former Nike Ajax missile silos (Figure A-2). These structures are described in further detail in Section 4.0.

Historic aerial photographs and topographic maps dating as early as 1942 show the North Penn USARC property as open fields or used for agricultural production prior to U.S. Government ownership. Those maps, located in Appendix A, show no pre-military structures present on the property. The U.S. Government purchased the property in 1954 and subsequently constructed a Nike Ajax missile launch facility. The property functioned as a Nike Ajax missile launch facility until 1964, after which it was converted to a USAR Center (See figures in Appendix A).

When it served as a Nike Missile launch facility, the property contained other buildings, including a barracks, a bachelors' officers quarters (BOQ), a missile assembly and test building, a generator building, a paint shed, an acid storage shed, and a chemical storage shed. These buildings were located around the northeastern portion of the property, and were demolished circa 1973-1974 (demolition plans are in Appendix A, Figure 12). Today, the only remaining architectural elements from the Nike Missile period include the underground storage silos, an underground sewage treatment plant, an unheated storage building, and a well pump house.

Because of modernization of the Nike missile from the Ajax to Hercules variant, described more fully in Section 4.3.1, the property no longer functioned as a launch facility after 1964. At that time, it was transferred over to the U.S. Army Reserve as a training site. Construction of the current USARC administration building and the Organizational Maintenance Shop was completed in 1974.

4.0 CULTURAL RESOURCES RECONNAISSANCE and EVALUATION

4.1 Site Visit

On the morning of January 12, 2010, representatives from Brockington, AGEISS, and the 99th RSC conducted a walkover of the property with the facility manager of the North Penn USARC. Members of the Local Redevelopment Authority were also in attendance. During the afternoon, Brockington personnel conducted a more thorough pedestrian reconnaissance of the 19-acre tract, inspecting the ground cover, landforms, the former underground Nike Missile silos, as well as all above-ground buildings and structures. Because the U.S. Army proposes to transfer the property to Worcester Township, we limited the APE to the existing legal property boundary for both archaeology and historic architecture.

4.2 Archaeology

There has been no systematic archaeological survey for 99th RSC properties in Pennsylvania. Instead, efforts have focused on new construction, expansion or disposal actions (USACE 2009: 8.107). No systematic survey (e.g. shovel testing) has taken place at the North Penn USARC. As documented in Section 2.0, there are no previously recorded archaeological resources within 1.0 miles of the North Penn USARC. However, the absence of recorded sites does not necessarily negate the potential for sites.

Therefore, as part of the archival research, we also reviewed historic maps and drawings to identify previous land uses and disturbances. Specifically, the 99th RSC supplied original as-built engineering drawings for the North Penn property. We also reviewed historic topographic quadrangles and aerial photography. A review of these materials suggested the 19-acre North Penn USARC property has been subjected to a substantial amount of ground disturbance since the 1950s.

As evidenced during the reconnaissance and in the literature review, the rear (northwestern) portion of the property is largely fill, and contains the sanitary system, Organizational Maintenance Shop (OMS), and underground NIKE Missile Silos (Figures B-2 through B-11). Many of the buildings formerly associated with the Nike Missile battery were located in what is now the central parking lot of the property. These were demolished circa 1973-1974. Additionally, as shown in Figure A-2, most of the remaining property is covered by impervious surfaces such as asphalt parking, driveways, concrete walkways and building footprints. A bermed area, associated with the old Nike battery sewage treatment facility and Missile handling area, is located on the northeast portion of the property.

Because of the extent and pattern of these previous land disturbances, there appears to be very little potential for the presence of intact cultural deposits. Therefore, we recommend that a Phase I archaeological survey (systematic shovel testing) is not necessary.

4.3 Historic Architecture

The North Penn USARC property was originally purchased by the Department of Defense for use by the U.S. Air Force as a NIKE Missile base in 1954. The only remaining architectural components of that period are the underground missile silos, only one of which was accessed during the reconnaissance. Other buildings on the property include the current administration building and the OMS. Property photographs are provided in Appendix B. Figure B-1 contains a photo key.

Building	Date of Construction	NRHP Recommendation
Main Reserve Center (Administration)	1974	Not Eligible
Organizational Maintenance Shop (OMS)	1974	Not Eligible
Unheated storage building	1955	Not Eligible
Potable well pump house	1958	Not Eligible
Three Nike Ajax missile silos	1954-1955	Not Eligible

The current administration building (Figure B-12 and B-13) was constructed in 1974. It is an irregular-shaped two-story structure, with a two-story drill hall to the rear, connected by an enclosed corridor. The building's interior space consists of classrooms, office space, a kitchen area, storage, former indoor firing range, and a drill hall.

The OMS building, also constructed in 1974, is located at the northern portion of the property and consists of a one-story rectangular steel and brick building with five maintenance bays (Figure B-14). There are impervious parking areas surrounding each of the four sides, and the former Nike launch area is located between the building and the northern perimeter fence line. The OMS also has an associated grease rack (Figure B-15).

The administration building and OMS do not meet the basic age criteria, 50 years, to be considered for inclusion in the NRHP. However, properties less than 50 years of age may be considered if they are of "exceptional" significance (Sherfy and Luce n.d.). Military properties, in particular, should be assessed for their associations with Cold War technology, political events, or missions (Murphey 1995; USACE, Fort Worth District n.d.). Archival research did not identify any such significant associations with the North Penn administration and OMS buildings, and are not recommended eligible for inclusion in the NRHP.

4.3.1 Nike Missile Bases – An Overview

Constructed during the early Cold War, Nike Missile bases, along with Strategic Air Command bomber bases and missile silos, were the primary military installations that symbolized the United States' Cold War military strategy of using technology and nuclear weapons to protect itself from the larger conventional forces of the Soviet Union. During the 1950s and 1960s, the Nike bases were tasked with the defense of

major American urban and industrial areas from Soviet nuclear bomb attack. At its peak, the Army operated over 200 Nike batteries in the United States. With the introduction of intercontinental ballistic missiles in the late 1950s and the Anti-Ballistic Missile Treaty in the 1970s, the U.S. moved away from anti-aircraft defense and relied on the doctrine of Mutually Assured Destruction and the accuracy of its multiple independently targetable reentry vehicle nuclear weapons to maintain a balance of power with the Soviets for the remainder of the Cold War (Diener and Salo: 2004; Bender: 2004).

4.3.2 Nike-Ajax Missile Battery PH-91 Launch Site (Worcester/Center Square)

Between 1954 and 1958, the U.S. deployed some 300 Nike-Ajax batteries across the country to protect large urban cities, industrial centers, and military installations. The North Penn USARC contains the PH-91 (Worcester/Center Square) launch site, which was one of twelve batteries designed to protect the City of Philadelphia. The missiles were stored in underground reinforced concrete bunkers, which were equipped with elevators to raise them into firing position. According to Snyder and Guss (1974:151), the USACE emphasized speed during construction “at premium plus overtime.” The sites were initially manned by the Air Defense Artillery, and later manned by the National Guard. Shortly after its construction, the U.S. began converting Nike-Ajax bases to accommodate the longer-range Nike-Hercules. Since the Nike-Hercules had a longer-range, it required fewer bases and selected Ajax batteries were deactivated, including PH-91 (Lonnquest and Winkler: 165-183; see also Cagle 1959).

Each Nike facility had three components: an administrative area, an integrated fire control area, and the launch area. The administrative area, generally collocated with either the launch or fire control component, consisted of a barracks, mess hall, and other office or supply structures. The IFC contained tracking radars, power plant, and trailers with radar control and a maintenance facility. The initial Nike batteries had above ground launchers:

This quickly changed as land restrictions forced the Army to construct space-saving underground magazines. Each magazine had an elevator that lifted the missile to the surface in a horizontal position. Once above ground, the missile could be pushed manually along a railing to a launcher placed parallel to the elevator. Typically, four launchers sat atop the magazine. Near the launchers, a trailer housed the launch control officer and the controls he operated to launch missiles. In addition to the launch control trailer, the launch area contained a generator building with three diesel generators, frequency converters, and missile assembly and maintenance structures (Lonnquest and Winkler 1996: 172-173).

4.3.3 Evaluation of the Nike PH-91 Launch Facility

There are few remaining components of the Worcester (PH-91) Nike Missile facility. Those that have survived include the underground storage chambers and elevators, an

unheated storage building (Figures B-16 and B-17) and a well pump house (Figure B-18). Constructed in 1955, the unheated storage building (also identified in documents as a fire protection pump house) is located northeast of the OMS, near the underground Nike Missile chambers. It is a one-story steel and masonry building. The well pump house does date to the late Nike occupancy of the property but represents a simple utilitarian structure. Constructed in 1958, it is located in the center of the North Penn property, and consists of a 54-square foot brick and steel structure covered in modern vinyl siding.

Both buildings were constructed as support structures within the larger Nike Missile complex. Without the other ancillary structures, these buildings have lost their context and can no longer convey their historical associations. In addition, they do not express a particular building style or method, and are not recommended eligible for inclusion in the NRHP.

The Nike-Ajax Missile silos are located behind (north of) the OMS building. These underground silos, or vaults, are lined with steel-reinforced concrete, and are accessed by both a stairwell and a vertical hatch (Figure B-19). During the January 12 site visit, we were able to access the interior of the western most silo (Figures B-20 through B-22). The chamber contained the elevator shaft and the control area, but few pieces of original equipment remained. The elevator shaft was filled with water and could not be visually inspected. The vaults were also inspected as part of the ECP report in 2007 (CH2M 2007: 2.4), and at the time were “filled with water.” The report documented that the center silo was used for “potential fire fighting purposes.”

As part of our evaluation, we reviewed historical monographs describing the development and deployment of the Nike-Ajax Missile, along with detailed descriptions of the batteries and bases. We also reviewed Historic American Engineering Record (HAER) photographs available through the Library of Congress online collections. Based on historic photographs of similar Nike facilities, the North Penn Nike chambers appear to retain their architectural integrity and original condition, though the electronic and mechanical equipment has been removed.

However, the North Penn (PH-91) Nike-Ajax launch facility does not appear to retain sufficient architectural or engineering integrity or significant historical associations to be considered NRHP-eligible at the National or State levels of significance. It was one of twelve such bases around Philadelphia and one of hundreds constructed across the United States. The Library of Congress HAER collection has numerous better-documented examples of intact facilities, including those with surviving ancillary and support structures.

Local significance for Cold War cultural resources is often argued on the basis that a resource may represent the only type or style within a particular region or that the property was a unique addition to a particular community.

While the state and local issues are significant, they are not exceptionally significant in the Cold War context. The Cold War was not primarily about local economic and social impacts of installations; it centered on mutual fear and mistrust of opposing ideologies and the American investment in technology for strategic advantage over the Soviet Union (USACE, Fort Worth District).

In January 2008, the 99th Regional Readiness Command (RRC) documented another former Nike site at the Bristol USARC property in Bucks County, Pennsylvania, and recommended that the facility was not eligible for the National Register. In February 2008, the Pennsylvania SHPO concurred with that recommendation (Reference #ER 08-0912-017-A). The Bristol and North Penn Nike facilities are similar in history, surviving physical components, and architectural integrity.

The North Penn Nike launch area does not possess historical associations at the national, state, or local levels of significance to be considered NRHP eligible. In addition, compared to other documented Nike facilities, North Penn does not possess a high degree of architectural integrity. Therefore, we recommend the Nike-Ajax launch facility (underground chambers) at the North Penn USARC not eligible for the NRHP.

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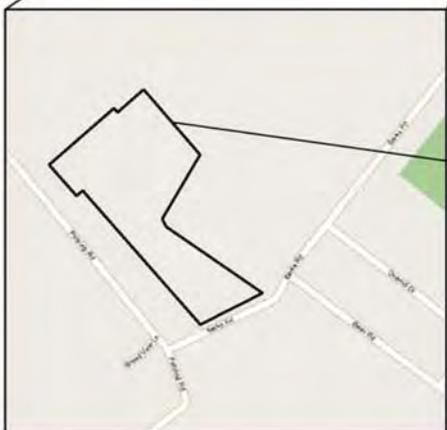
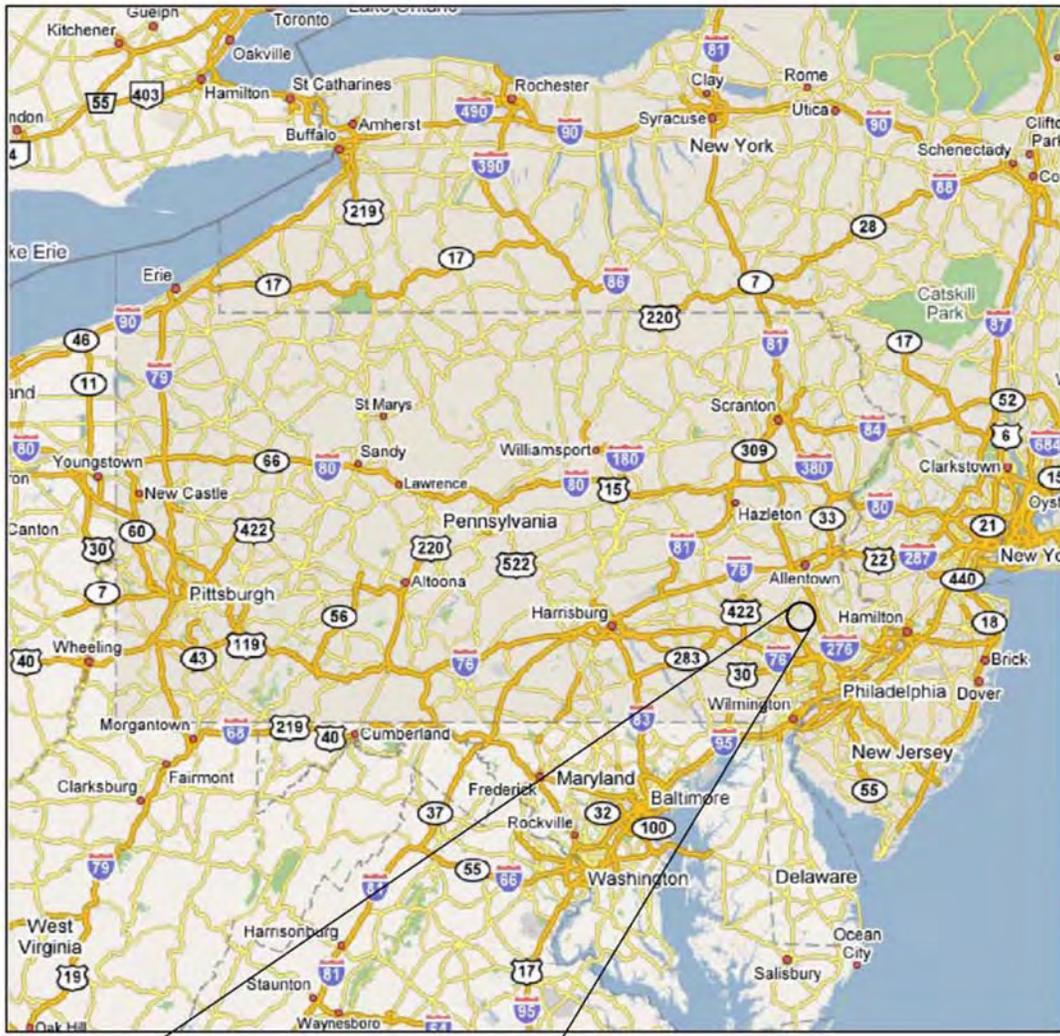
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U.S. Army Corps of Engineers, Fort Worth District

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[Http://www.swf.usace.army.mil/pubdata/environ/cultural/trinity.asp](http://www.swf.usace.army.mil/pubdata/environ/cultural/trinity.asp).

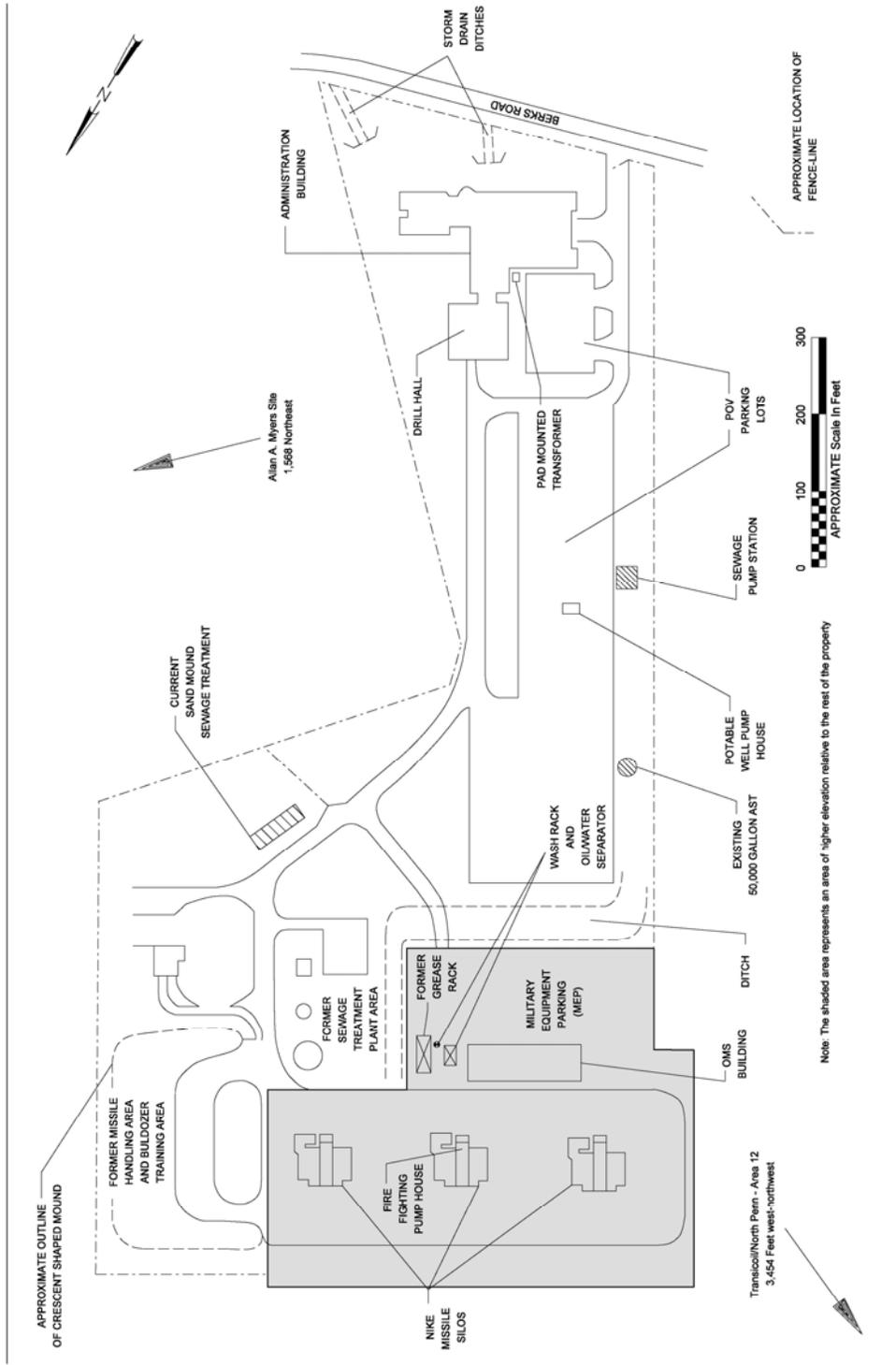
APPENDIX A
MAPS



NOTE: THIS FIGURE IS NOT TO SCALE, AND IS INTENDED TO SHOW THE NORTH PENN USAR CENTER RELATIVE TO OTHER GEOGRAPHIC FEATURES

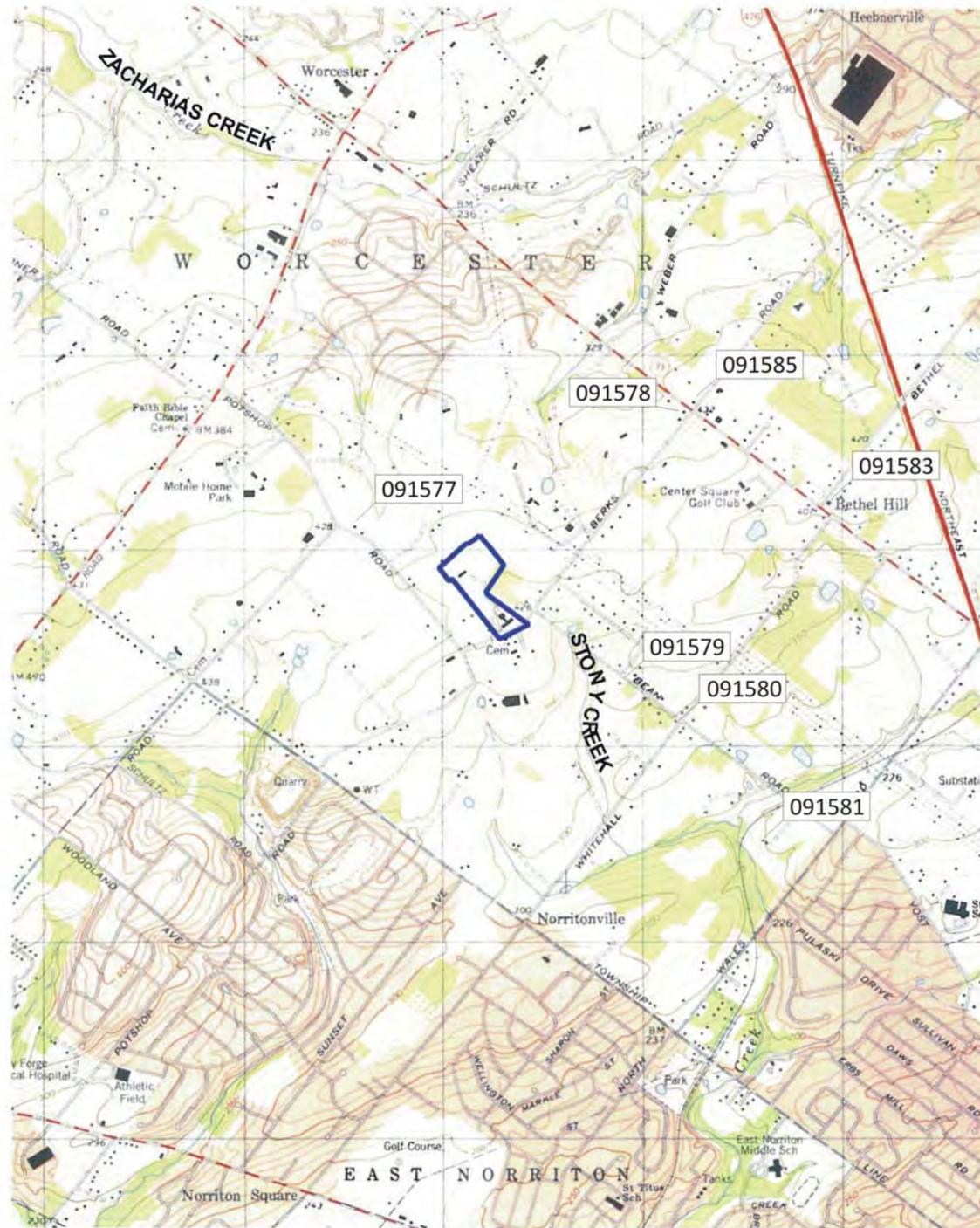
**NORTH PENN
USAR CENTER
1625 BERKS ROAD
WORCESTER, PENNSYLVANIA**

Figure A1. North Penn USARC location map (from ECP Report).



ESG6200013.MXD North Penn USARC 2_Site_1.dwg

Figure A-2. North Penn USARC property layout (from ECP Report).

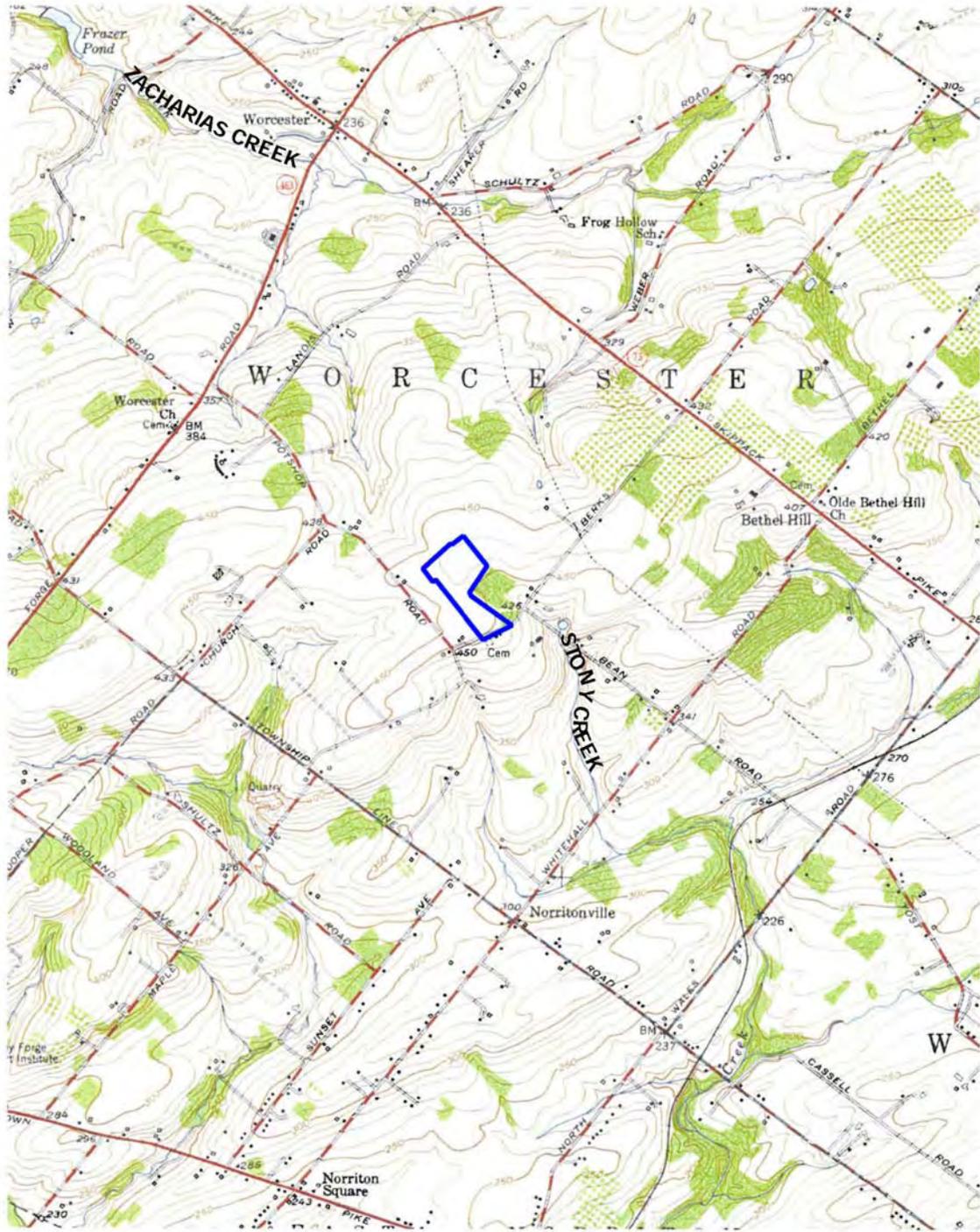


N^ EDR INQUIRY# 1714247.238 TARGET QUAD: LANSDALE YEAR: 1999 Series: 7.5' Scale: 1:24,000

Figure A-3. Previously recorded cultural resources within 1.0 miles of the North Penn USARC.



Figure A-4. 1942 aerial (from ECP report).

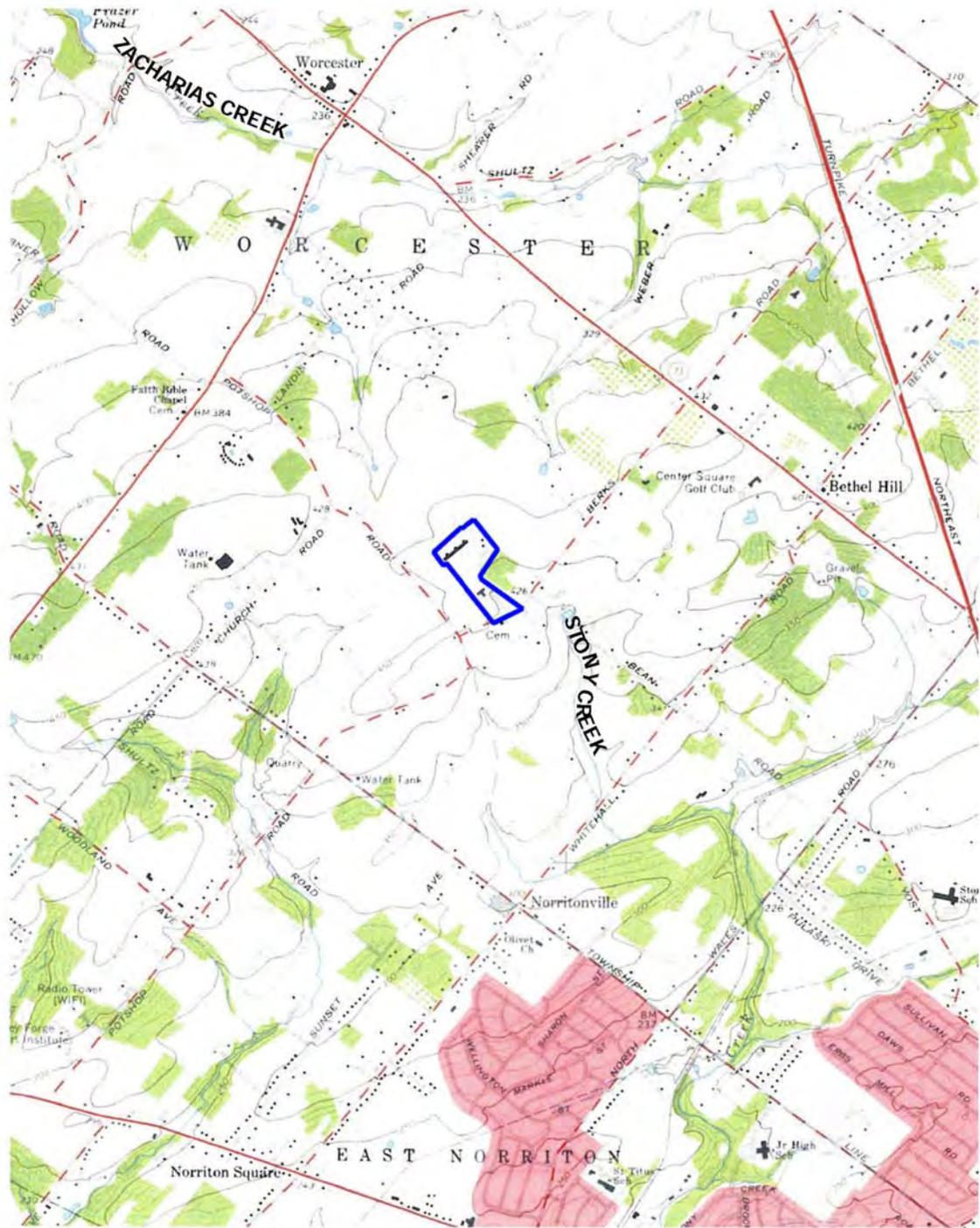


N ^ EDR INQUIRY# 1714247.238 TARGET QUAD: LANSDALE YEAR: 1951 Series: 7.5' Scale: 1:24,000

Figure A5. 1951 USGS topographic quadrangle (from ECP Report).



Figure A-6. 1958 aerial (from ECP report).

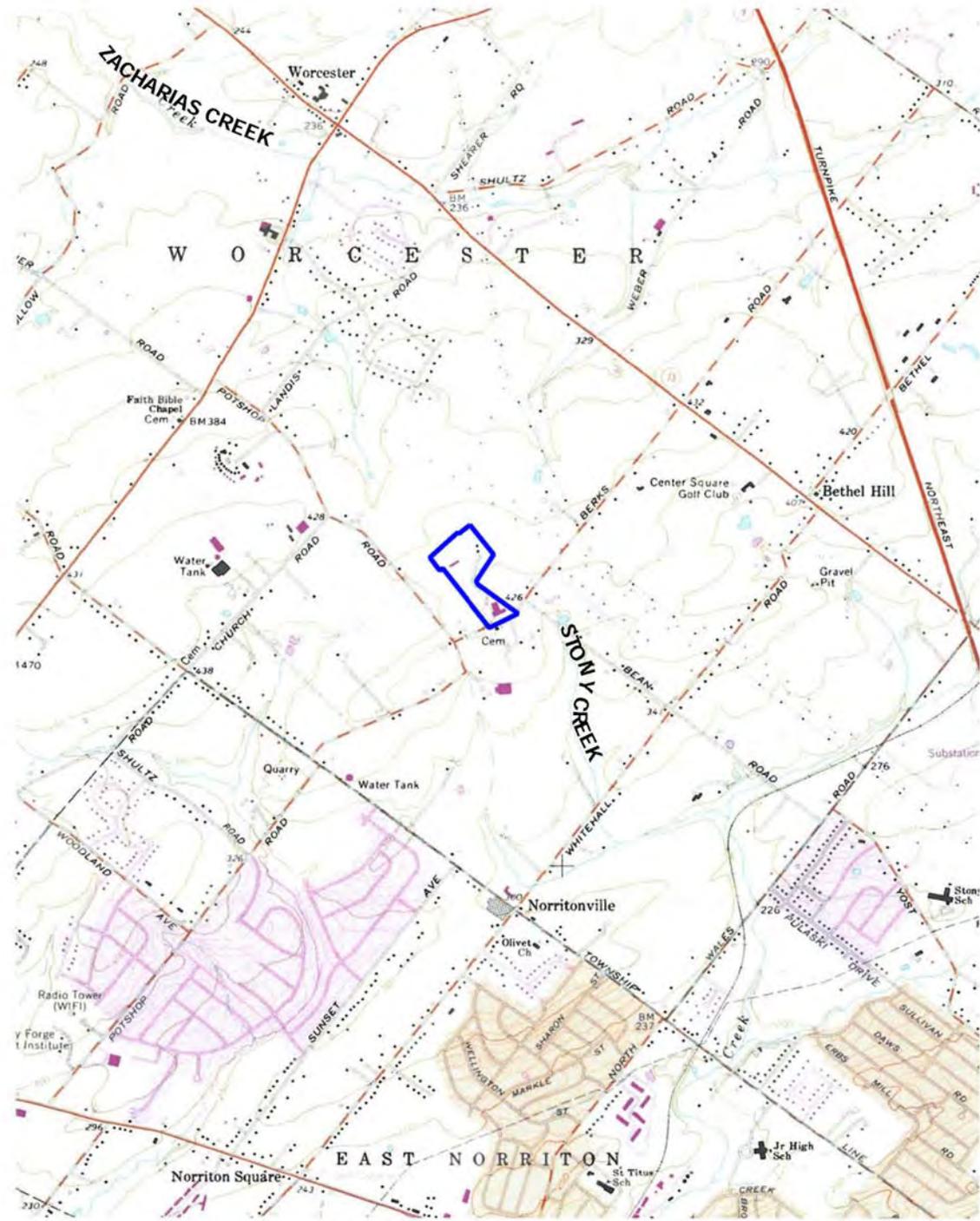


N^ EDR INQUIRY# 1714247.238 TARGET QUAD: LANSDALE YEAR: 1966 Series: 7.5' Scale: 1:24,000

Figure A-7. 1966 USGS topographic quadrangle (from ECP report).



Figure A-8. 1973 aerial (from ECP report).



NAD83 EDR INQUIRY# 1714247.238 TARGET QUAD: LANSDALE PhotoRevised: 1966-1983 Series: 7.5' Scale: 1:24,000

Figure A-9. 1983 USGS topographic quadrangle (from ECP report).

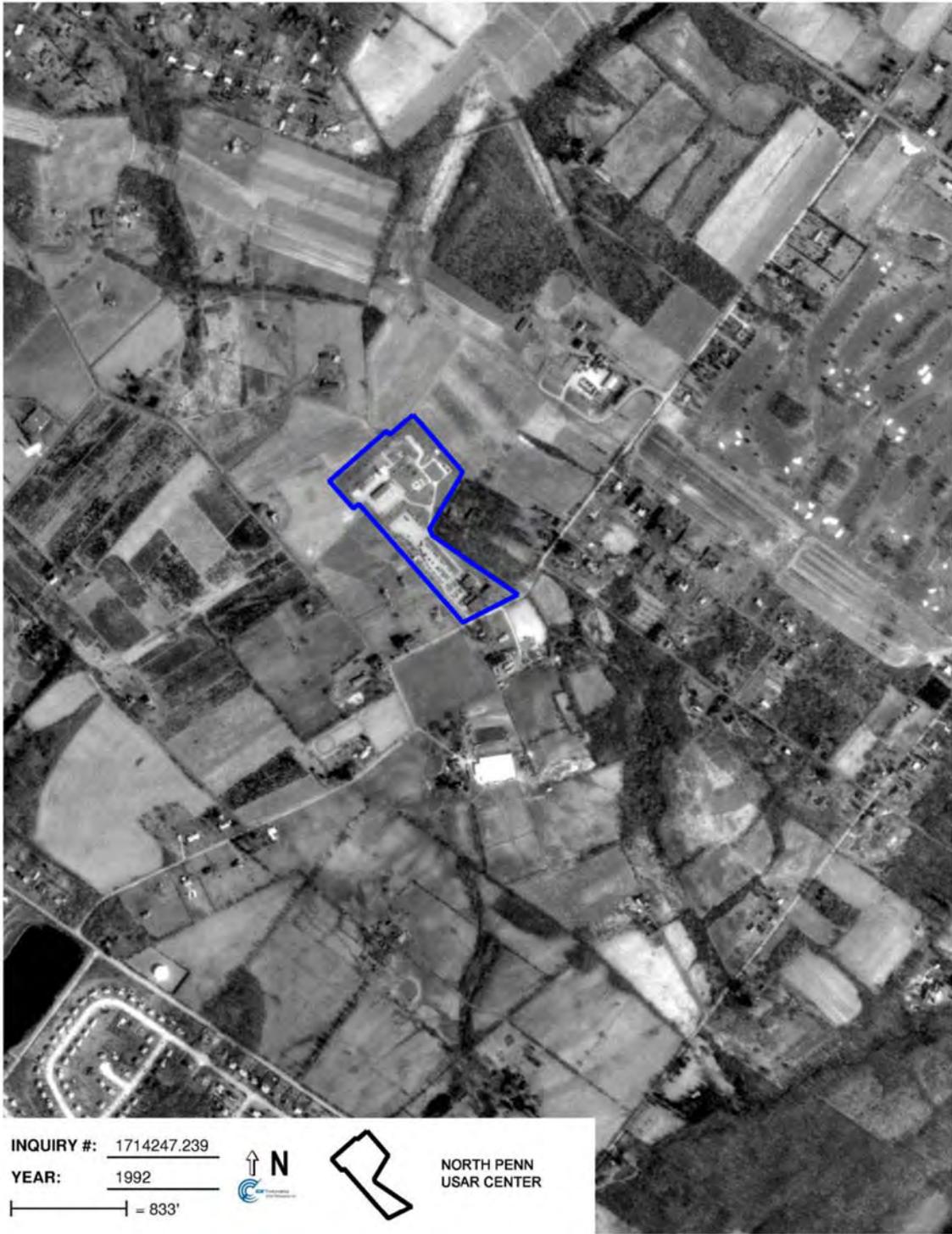


Figure A-10. 1992 aerial (from ECP report).



Figure A-11. 2004 aerial of the North Penn USARC property.

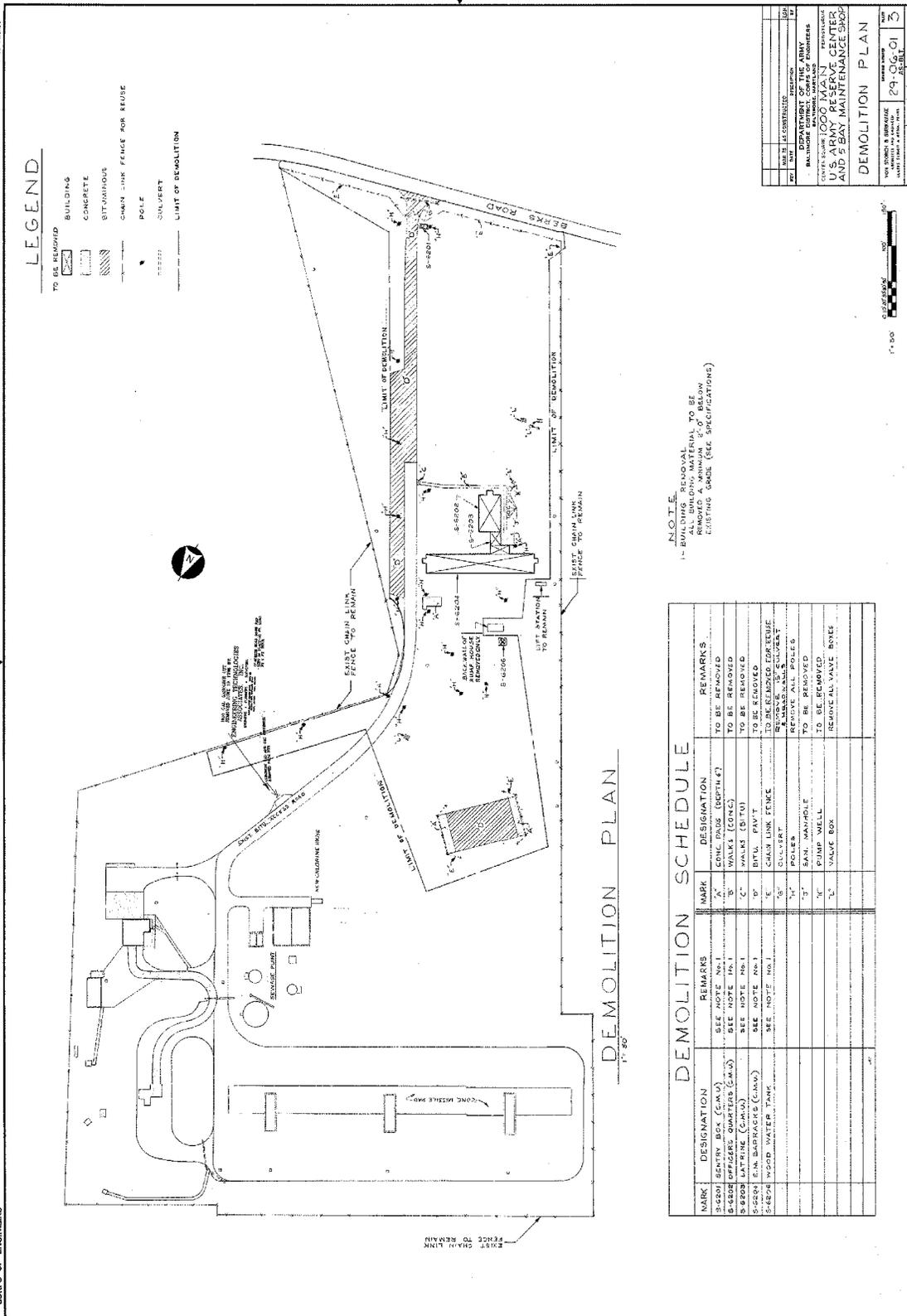


Figure A-12. Nike Missile Battery demolition plans, 1972, in preparation for construction of the North Penn USARC.

**APPENDIX B
PHOTOGRAPHS**

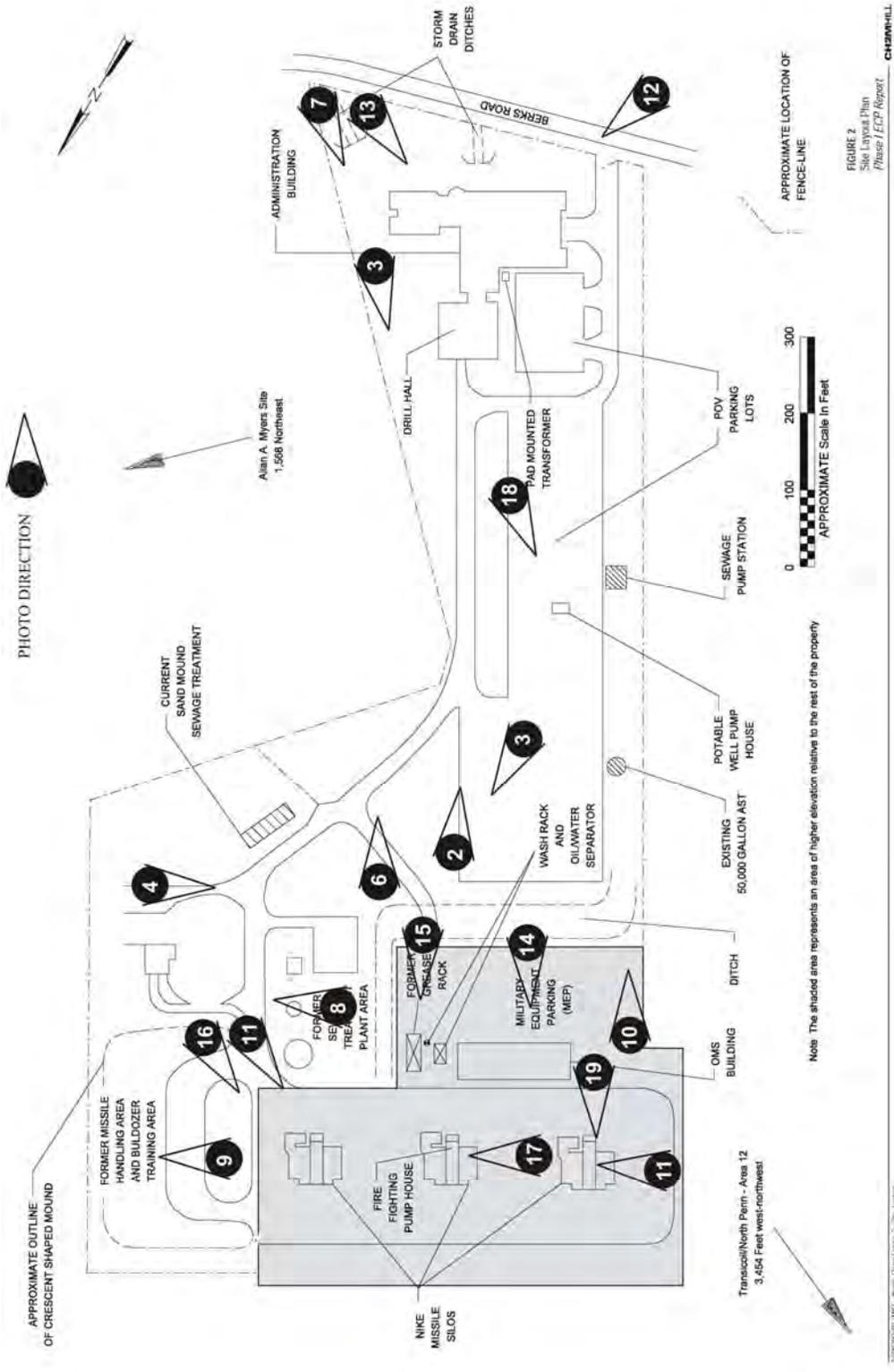


Figure B-1. Key to Appendix B photographs.



Figure B-13. Facing southeast from OMS building.



Figure B-3. Facing north from center of North Penn property.



Figure B-4. Facing west from old missile handling area.



Figure B-5. Facing northwest from administration building.



Figure B-6. Facing south from old sewage treatment plant.



Figure B-7. Facing northwest from front corner of property.



Figure B-8. Facing east across old sewage treatment plant.



Figure B-9. Facing northeast across old missile handling area.



Figure B-10. Facing south along western property line.



Figure B-11. Facing north from the OMS across the former Nike Missile launch area.



Figure B-12. North Penn USARC administration building, facing east.



Figure B-13. North Penn USARC administration building, facing north.



Figure B-14. OMS building, facing north.



Figure B-15. Grease rack near OMS.



Figure B-16. Unheated storage building, facing north.



Figure B-17. Facing east across the Nike Missile launch area (storage building in background).



Figure B-18. Well pump house, facing west.



Figure B-19. Facing northwest across the silo elevator door.



Figure B-20. Interior of missile silo, towards elevator shaft.



Figure B-21. Interior of missile silo.



Figure B-22. Interior of missile silo, elevator shaft.

APPENDIX E. EA COMMENTS AND RESPONSES

E.1 INTRODUCTION

During the 30-day public comment period for the environmental assessment (EA) and draft Finding of No Significant Impact (FNSI) from Monday, December 20, 2010 to Tuesday, January 18, 2011, the Army received one comment letter from Mr. David R. Burman, Township Manager, Worcester Township. A copy of this letter is included in this appendix. The comments are summarized below with the Army's responses.

E.2 COMMENTS AND RESPONSES

Comment: Former Nike missile underground facilities. This comment discusses the security of the underground facilities against unauthorized access and the use of the area surrounding the underground facilities for public park and recreational purposes. Worcester Township requested that the EA be revised to indicate that the township will ensure that the underground facilities remain secured against unauthorized public access, and that the area surrounding the underground facilities will be used for public park and recreational purposes.

Response: The EA analyzes the use of the area surrounding the underground facilities for public park and recreational purposes. The EA acknowledges that the use of this area could pose a potential adverse impact to child health and safety and states that the 99th Regional Support Command (RSC) will take reasonable precautions to secure the portion of the property containing the Organizational Maintenance Shop pad, the vehicle storage area, and the underground missile silos prior to transfer. Mitigation would include fencing and locking the area to prevent unauthorized access. In addition, barriers to the entrances of the silos and other underground facilities would be secured by locks and welds to prevent unauthorized entry.

There may be a period of time between transfer of the property and implementation of the reuse plan by Worcester Township. Therefore, the EA states that Worcester Township will continue the mitigation the 99th RSC puts in place to prevent unauthorized access. It is expected that Worcester Township would continue this mitigation at least until the township is ready to implement their reuse plan. As the new property owner, Worcester Township will have the responsibility to determine and implement appropriate safety measures for their proposed use as public park and recreational purposes. Thus, the EA states that Worcester Township will not allow public access to this area in the future without first implementing appropriate safety measures.

Comment: Discussion of the Preferred Alternative. This comment indicates that the EA incorrectly states that the eastern wing of the main building will be demolished. Worcester Township has not determined whether or not to demolish a portion of the building.

Response: The Army revised the EA to clarify that a wing of the administration building may be demolished. The analysis of the potential impacts of demolishing a portion of the building

remains in the EA. Since it has not been determined whether or not demolition will occur, the EA presents a more conservative analysis than if impacts from demolition were not considered.

Comment: Environmental Condition of Property. This comment refers to areas of potential concern that were subsequently removed from consideration following negotiations between the Pennsylvania Department of Environmental Protection (PADEP) and the 99th RSC. The comment also states that the EA does not address the impacts of soil contamination in the storm water drainage ditch in front of the main building. The comment requests that the results of the soil sample scheduled to be taken in this area in July 2010 be included in the EA.

Response: As part of a site visit with PADEP in July 2009, three potential areas of concern were removed from consideration: former spoils area, historical spill of heating oil, and the Organizational Maintenance Shop (OMS) service pit closure. The former spoils area was sampled in 2001 and no exceedances of PADEP Act 2 regulatory standards were reported. The historical spill of heating oil was investigated through soil sampling in the storm water drainage ditch during the July 2010 investigation, as described in the next paragraph. The OMS service pit is encased in cement therefore sampling was not required.

The results of the soil sample taken from the storm water drainage ditch during the July 2010 investigation are included in the Soil Contamination subsection in Section 4.13.1.3. Based on the laboratory analytical reports, semi-volatile organic compounds were detected in the composite surface soil sample at concentrations below their respective PADEP Act 2 Medium Specific Concentrations. Total petroleum hydrocarbon was detected at a concentration of 1,340 mg/kg. There is not a PADEP Act 2 Medium Specific Concentration for total petroleum hydrocarbon. However, the State of Pennsylvania has determined that if no surface soil Medium Specific Concentrations for individual chemicals were exceeded, no health-based standards have been exceeded.

The potential for groundwater contamination was not removed from consideration. The need for any further groundwater characterization was deferred until after completion of a Phase II Environmental Condition of Property (ECP) report. The purpose of the Phase II ECP at the North Penn United States Army Reserve Center (USARC) is to fulfill the PADEP request for additional data regarding areas of potential environmental concern identified in the Phase I ECP. The draft final report was sent to PADEP on January 26, 2011 and is included in this EA in Appendix F. Soil samples did not contain target constituent concentrations in excess of their respective PADEP Act 2 standards. The Army has requested concurrence from PADEP that analytical data submitted in the Phase II ECP Report is sufficient to demonstrate that the referenced areas are not contamination sources.

Comment: Underground Storage Tanks. This comment refers to underground storage tanks (USTs) listed on the PADEP Tank Incident List in “inactive” status. Worcester Township requests that underground storage tanks be properly closed and documented as per state law before conveyance of the property to the township.

Response: As part of the site visit with PADEP in July 2009, the Army agreed to provide documentation and sample analysis confirming proper tank closures for USTs through subsurface soil sample collection in the vicinity of the former 5,000-gallon diesel UST, former 1,000-gallon gasoline UST, and former 20,000-gallon diesel UST. Soil samples were collected from these areas per PADEP guidance during investigations in 2010. The EA contains the results of this soil investigation and no exceedances of PADEP Act 2 regulatory standards were reported. The Army will demonstrate and document compliance with Pennsylvania UST closure requirements.

Comment: Location of North Penn Army Reserve Base in Worcester, PA, not Norristown, PA. This comment explains that throughout the EA, reference is made to the location of the North Penn USARC in Norristown, PA, rather than its actual location in Worcester Township, PA.

Response: In response to this comment, the EA was revised throughout to base the analysis of existing conditions and potential impacts on the physical location of the North Penn USARC. “Norristown” is part of the North Penn USARC’s legal description and mailing address. Both Norristown and Worcester Township are located in Montgomery County, Pennsylvania. Throughout the EA, references to facts and statistics relative to Norristown were replaced with appropriate facts and statistics concerning Worcester Township.

Comment: Playing Fields. This comment notes that the EA indicates the potential for noncommercial playing fields and that noncommercial playing fields are not part of the reuse plan.

Response: The EA was revised to delete the reference to noncommercial playing fields as a potential part of the reuse plan.

Comment: A general comment expressed concern that there has been insufficient characterization of the site to make a determination as to the impacts to the environment and public health as a result of past activities at the site.

Response: A Phase II ECP report is in progress. The purpose of the Phase II ECP at the North Penn USARC is to fulfill the PADEP request for additional data regarding areas of potential environmental concern identified in the Phase I ECP. The Phase II ECP report will present the results of the additional site assessment as well as conclusions and recommendations. The Army will request concurrence from PADEP that analytical data submitted in the Phase II ECP report is sufficient to demonstrate that the referenced areas are not contamination sources at the North Penn USARC. As stated in Section 4.13.2.1, closure of the North Penn USARC would not relieve the Army of its responsibility to investigate and clean up potential soil and or groundwater contamination resulting from previous Army activities.

ERECTED INTO A TOWNSHIP IN 1733
TOWNSHIP OF WORCESTER
AT THE CENTER POINT OF MONTGOMERY COUNTY
PENNSYLVANIA

Board of Supervisors:

ARTHUR C. BUSTARD, CHAIRMAN
SUSAN G. CAUGHLAN, VICE CHAIRMAN
STEPHEN C. QUIGLEY, MEMBER

1721 Valley Forge Road
P.O. Box 767
Worcester, PA 19490

VIA E-MAIL

Ms. Amanda Murphy
99th RSC DPW
5241 South Scott Plaza
Fort Dix, NJ 08640

January 17, 2011

**Re: Final Environmental Assessment (EA) and Draft Finding of No Significant Impact
for North Penn Memorial U.S. Army Reserve Center, Worcester, PA**

Dear Ms. Murphy:

Please accept the following comments on behalf of Worcester Township, which has applied to receive the property in a public benefit conveyance for use as a public park and recreational facility.

1. Former Nike missile underground facilities. Throughout the EA, the comment is made that a potential adverse impact to child health and safety could occur if children were to gain access to "that portion of the property containing the underground missile facilities." We would like to point out that the underground missile facilities themselves are completely secured against public access by steel cover plates that are welded shut. The only entrances, the former emergency escape hatches, are padlocked shut. The township will insure that these steel cover plates and padlocks remain in place and that these underground facilities are secured against unauthorized access. However, the township proposes to use the paved areas adjacent to the underground missile facilities for public park and recreational purposes, as required by the Federal Lands to Parks Program under which the township applied to receive the property.

Given that the paved area adjacent to the underground missile facilities is designated on the LRA's proposed Reuse Plan to be used for public park and recreational purposes, the township believes that this area poses no threat to child health and safety, because the underground facilities are secured against unauthorized access. For comparison, the former Richboro Nike missile site (located in Bucks County), which looks identical to the North Penn site, was conveyed to Northampton Township in the 1960s for use as a public park and recreational facility. Northampton Township built a recreation building and a batting cage on

the paved area between two of the closed Nike missile underground facilities. The paved area surrounding the closed underground facilities is completely accessible and open to the public.

Worcester Township respectfully requests that the EA be revised to indicate that the township will insure that the underground facilities remain secured against unauthorized public access, and that the area surrounding the underground facilities will be used for public park and recreational purposes, in accordance with the LRA's proposed Reuse Plan.

2. Discussion of Preferred Alternative. In section 3.1, Preferred Alternative, the EA incorrectly states that the eastern wing of the main building will be demolished. Although the Worcester Township Park & Recreation Task Force examined the potential demolition of the building or a portion thereof, the correct statement would be that the township has not determined whether to demolish a portion of the main building.
3. Environmental Condition of Property. In section 4.13.1.3, Environmental Condition of Property, the EA indicates that three areas on the property -- a former spoils area located southeast of the former sewage treatment plant, a historical spill of heating oil associated with the aboveground storage tank next to the potable water supply well, and potential groundwater contamination associated with historic Nike Ajax missile operations, including use of chlorinated solvents and acids -- had all been identified as areas of potential concern, but were subsequently removed from consideration following negotiations between PADEP and the 99th RSC.

Before these areas are declared not to be areas of concern, Worcester Township must be assured that they will not cause a threat to the health and safety of the public using the property as a park or the township's employees or agents who will maintain the property. In particular, the potential groundwater contamination associated with the Nike Ajax missile operations on the site could have a negative impact on the surrounding community if groundwater contamination extends off site. The residential properties surrounding the site all depend on private wells for their potable water, as does the Army Base itself.

In addition, the stormwater draining ditch located in front of the main building was impacted as the result of a past heating oil spill from the building. The EA does not address the potential negative impact to the environment if soil contamination remains at this location. Since stormwater collected from this property is discharged to the public road via this ditch, the potential for off-side contamination exists if the soil in this area is contaminated with heating oil residue. A soil sample was scheduled to be taken in this area as part of the July 2010 follow-up testing. The EA should include the results of this sample.

4. Underground Storage Tanks. In section 4.13.1.3, Environmental Condition of Property, the EA indicates that at least two underground storage tanks (USTs) on the property are listed on the PADEP Tank Incident List in "inactive" status, indicating the PADEP does not consider the UST as being closed. The property records indicate that there may be additional underground tanks on site that were also not properly closed. Because of this, Worcester Township's position is that allowing the status of these USTs to remain as "inactive" in DEP's register constitutes noncompliance with applicable state regulations, which require

unused USTs to be closed and the closure to be properly documented. Without proper documentation of closure, there is no assurance that the tanks (or the earlier closure activities) did not cause some groundwater contamination, which would have adverse effects on surrounding residential properties that rely on private wells for their potable water. Worcester Township requests that these tanks be properly closed and documented as per state law before conveyance of the property to the township.

5. Location of North Penn Army Reserve Base in Worcester, PA, not Norristown, PA. Throughout the EA, reference is made to the location of the Reserve Base in Norristown, PA, rather than its actual location in Worcester Township, PA. Throughout the document, references to facts and statistics relative to Norristown should be replaced with appropriate facts and statistics concerning Worcester Township, and references to the Norristown School District should be replaced with references to the Methacton School District, which serves Worcester Township. References should be further corrected to reflect police coverage provided by the Pennsylvania State Police and fire protection provided by the Worcester Volunteer Fire Department. Likewise, references to redevelopment initiatives in downtown Norristown are not necessarily relevant to the EA. Also, it should be noted that "Worcester" is spelled incorrectly as "Worcester" in several sections of the EA. This should be corrected.
6. Playing Fields. In section 4.2.2.1, Preferred Alternative: Traditional Disposal and Reuse, the EA indicates the potential for noncommercial playing fields. It should be noted that noncommercial playing fields were never discussed as an option by the township or the LRA.

As a general comment to this EA, Worcester Township is concerned that there has been insufficient characterization of the site to make a determination as to the impacts to the environment and public health as a result of past activities on this site. The Township is confident that this concern can be addressed to the mutual satisfaction of all parties so that there can be a very successful adaptive re-use of the property as part of the Worcester Township Park and Open Space Program.

Thank you for considering Worcester Township's comments.

Sincerely yours,



David R. Burman
Township Manager

cc: Mr. Dustin Armstrong, Southeast Regional Office, PADEP
Worcester Township Board of Supervisors
J. Garrity, Worcester Township Solicitor
J. Nolan, Worcester Township Engineer

APPENDIX F. PHASE II ENVIRONMENTAL CONDITION OF PROPERTY

The Army completed a Phase II Environmental Condition of Property (ECP) at the North Penn United States Army Reserve Center (USARC). The purpose of the Phase II ECP is to fulfill the Pennsylvania Department of Environmental Protection's (PADEP's) request for additional data regarding areas of potential environmental concern identified in the Phase I ECP. The draft final report was sent to PADEP on January 26, 2011. This appendix contains the Army's transmittal letter to the PADEP and the draft final report. Due to their length, the appendices of the draft final report are not included in this environmental assessment (EA) but are available upon request and as a part of the Administrative Record of the EA.



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RESPONSIVENESS · INTEGRITY · TEAMWORK

January 26, 2011

Dustin Armstrong
DEP Southeast Regional Office
2 E. Main Street
Norristown, PA 19401-4915

Subject: Draft Report for Phase II Environmental Condition of Property (ECP) Report
North Penn Memorial USARC (Facility ID Code PA 139)
1625 Berks Road, Norristown, PA 19403
Bhate Project No.: 9080148

Dear Mr. Armstrong:

The enclosed Phase II ECP Report was prepared on behalf the U.S. Army Reserve (99th RSC) by Bhate Environmental Associates, Inc., (Bhate), and its teaming partner, Stell Environmental Enterprises, Inc. (SEE), under contract U.S. Army Corps of Engineers (USACE), Baltimore District.

The report includes the summary of results, findings and conclusions based on samples collected at the subject site. The work was performed to assist the Army fulfill its mission under Base Realignment and Closure (BRAC) program to expeditiously transfer excess properties as directed by BRAC law. We kindly request that PADEP provides review comments by February 25, 2011.

If you have any questions or need clarification, please contact Darlene Stringos- Walker at (484) 366-2088 or call me at (205) 918-4022. We look forward to hearing from you soon.

Respectfully submitted,
BHATE ENVIRONMENTAL ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read 'Lenus', is written over a horizontal line.

Lenus M. Perkins
Project Manager

Cc: Mona Garrett, 99th RSC
Laura Dell'Ohio, 99th RSC
Laura Lokey-Flipppo, USACE Baltimore
Darlene Stringos-Walker, Stell Environmental

DRAFT

**Phase II Environmental Condition of Property
in Support of Base Realignment and Closure
for North Penn Memorial
U.S. Army Reserve Center (PA139)
Norristown, Montgomery County,
Pennsylvania**

Prepared for:
**99th Regional Support Command
For Dix, New Jersey**

**United States Army Corps of Engineers
Baltimore District
Post Office Box 1715
Baltimore, Maryland 21203-1715**

**Contract No. W912DR-07-D-0039
Delivery Order Number: 002
Bhate Project No.: 9080148**

January 2011

Prepared By:



ENGINEERING, SCIENCE AND CONSTRUCTION
**1608 13th Avenue South, Suite 300
Birmingham, Alabama 35205**

Stell
SEI Environmental
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**PHASE II ENVIRONMENTAL CONDITION OF
PROPERTY IN SUPPORT OF BASE REALIGNMENT
AND CLOSURE FOR NORTH PENN MEMORIAL U.S.
ARMY RESERVE CENTERS (PA139)
NORRISTOWN, MONTGOMERY COUNTY,
PENNSYLVANIA**

Prepared for:

**99th Regional Support Command
Fort Dix, New Jersey**

Under Contract To:

**United States Army Corps of Engineers
Baltimore District
Post Office Box 1715
Baltimore, Maryland 21203-1715**

**Contract No. W912DR-07-D-0039
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 AND CLOSURE FOR NORTH PENN MEMORIAL U.S.
 ARMY RESERVE CENTERS (PA139)
 NORRISTOWN, MONTGOMERY COUNTY,
 PENNSYLVANIA**

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ARMY RESERVE CENTERS (PA139)
NORRISTOWN, MONTGOMERY COUNTY,
PENNSYLVANIA**

REVIEW SHEET

Darlene Stringos-Walker Environmental Engineer Stell Environmental Enterprises, Inc.	Signature	Date
Lenus M. Perkins Project Manager Bhate Environmental Associates, Inc.	Signature	Date

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DRAFT

**PHASE II ENVIRONMENTAL CONDITION OF
PROPERTY IN SUPPORT OF BASE REALIGNMENT
AND CLOSURE FOR NORTH PENN MEMORIAL U.S.
ARMY RESERVE CENTERS (PA139)
NORRISTOWN, MONTGOMERY COUNTY,
PENNSYLVANIA
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ACRONYMS AND ABBREVIATIONS

AST	Aboveground Storage Tank
ASTM	American Society of Testing and Materials
bgs	Below ground surface
Bhate	Bhate Environnemental Associates, Inc.
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DoD	Department of Defense
DPT	Direct Push Technology
ECP	Environmental Condition of Property
ft	Feet
FTA	Fire Training Area
MEP	Military equipment parking
Mg/kg	Milligrams per kilogram
MSC	Medium Specific Concentration
MS/MSD	Matrix spike/matrix spike duplicate
OMS	Organizational Maintenance Shop
OWS	Oil-water separator
PADEP	Pennsylvania Department of Environmental Protection
PID	Photoionization detector
P.G.	Professional Geologist
POV	Privately-owned vehicle
ppm	Parts per million
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
RSC	Regional Support Command
SAP	Sampling and Analysis Plan
SEE	Stell Environmental Enterprises
SVOC	Semi-volatile organic compounds
TPH	Total Petroleum Hydrocarbom
USACE	United States Army Corps of Engineers
USARC	United States Army Reserve Center
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VOC	Volatile organic compound

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EXECUTIVE SUMMARY

Bhate Environmental Associates, Inc., (Bhate), contracted through the U.S. Army Corps of Engineers (USACE), Baltimore District, under Contract #W912DR-07-D-0039 Delivery Order No. 002, presents the following Phase II Environmental Condition of Property (ECP) Report in Support of Base Realignment and Closure (BRAC) of North Penn Memorial U.S. Army Reserve Center (USARC) at 1625 Berks Road in Norristown, Montgomery County, Pennsylvania (hereinafter referred to as PA139). Bhate has teamed with Stell Environmental Enterprises, Inc. (SEE), to provide field and technical support for the project and PlanIt², Inc., to provide document quality assurance/quality control (QA/QC). The scope of services was executed on July 21 through 22 and October 28, 2010, as discussed in the USACE Sampling Work Plan (Bhate, 2009).

The purpose of this report is to summarize the results of the GeoProbe® direct push technology (DPT) soil investigations performed in Areas 1 through 5 conducted by SEE on July 21 through 22, and October 28, 2010, at PA139. Soil sampling was conducted in five areas at PA139. These areas are as follows:

- Area 1: Former 5,000-gallon diesel underground storage tank (UST)
- Area 2: Former 1,000-gallon gasoline UST
- Area 3: Former 20,000-gallon heating oil UST
- Area 4: Storm drain ditch
- Area 5: Former Fire Training Area (FTA) Burn Area

Area 1 – Former 5,000-gallon Diesel UST

On July 21, 2010, three soil borings (BH-01 through BH-03) were advanced to a depth of approximately 15 feet (ft) below ground surface (bgs) in the vicinity of the former 5,000-gallon diesel UST (Area 1, Figure 1-2). Three subsurface soil samples (BH-01-1011, BH-02-0910, and BH-03-0910) were collected and analyzed for the target analytes listed on the Pennsylvania Department of Environmental Protection (PADEP) Short List of Petroleum Products for Diesel Fuel/Fuel Oil No. 2 (revised on March 18, 2008) by U.S. Environmental Protection Agency (USEPA) Method 8260B. Based on the laboratory analytical reports, target analytes were not detected in subsurface soil samples above laboratory reporting limits; therefore, no constituent concentrations exceeded PADEP Act 2 Medium Specific Concentration (MSC) values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication PADEP, 2008).

Area 2 – Former 1,000-gallon Gasoline UST

On October 28, 2010, six soil borings (BH-24 through BH-29) were advanced to approximate depths ranging from 9 to 10 ft bgs in the vicinity of the former 1,000-gallon gasoline UST. Five subsurface soil samples (BH-25-0910, BH-26-27-0910, BH-28-0910, and BH-29-0910) were collected and analyzed for the target analytes listed on the PADEP Short List of Petroleum Products for Leaded Gasoline, Aviation Gasoline, and Jet Fuel (revised on March 18, 2008) by USEPA Methods 8260B and 6010B. Based on the laboratory analytical reports, naphthalene and

lead were detected in subsurface soil samples at concentrations below the PADEP Act 2 MSC values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication PADEP, 2008).

Area 3 – Former 20,000-gallon Diesel UST

On July 21, 2010, five soil borings (BH-11 through BH-15) were advanced to depths ranging from approximately 9 to 15 ft bgs in the vicinity of the former 20,000-gallon diesel UST. Five subsurface soil samples (BH-11-0910, BH-12-1011, BH-13-0809, BH-14-0910, and BH-15-0911) were collected and analyzed for the target analytes listed on the PADEP Short List of Petroleum Products for Diesel Fuel/Fuel Oil No. 2 (revised on March 18, 2008) by USEPA Method 8260B. Based on the laboratory analytical reports, target analytes were not detected in soil samples above laboratory reporting limits; therefore, no constituent concentrations exceeded PADEP Act 2 MSC values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication PADEP, 2008).

Area 4 – Storm Drain Ditch

On July 21, 2010, one composite surface soil sample (BH-16) was collected from the storm drain ditch and consisted of four aliquots collected from an approximate depth of 0 to 2 ft bgs using a hand auger. The surface soil sample was analyzed for semi-volatile organic compounds (SVOCs) and total petroleum hydrocarbon (TPH) by USEPA Methods 8270C and 9071B. Based on the laboratory analytical reports, SVOCs were detected in subsurface soil samples at concentrations below their respective PADEP Act 2 MSC values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication PADEP, 2008). TPH was detected at a concentration of 1,340 mg/kg. Currently, there is no PADEP Act 2 MSC for TPH.

Area 5 – Former FTA Burn Area

On July 22, 2010, four soil borings (BH-20 through BH-23) were advanced to approximate depth of 5 ft bgs in the vicinity of the former FTA burn area. Four subsurface soil samples (BH-20-0405, BH-21-0405, BH-22-0405, and BH-23-0405) were collected and analyzed for volatile organic compounds (VOCs), SVOCs, and TPH by USEPA Methods 8260B, 8270C, and 6010B. Based on the laboratory analytical reports, SVOCs were detected in subsurface soil samples at concentrations below their respective PADEP Act 2 MSCs. VOCs and TPH were not detected in soil samples above laboratory reporting limits; therefore, no VOC concentrations exceeded PADEP Act 2 MSCs. PADEP Act 2 MSC values for SVOC and VOC constituents were generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication PADEP, 2008).

Bhate recommends that the Army request concurrence from PADEP that analytical data submitted in this Phase II ECP Report for Areas 1 through 5 is sufficient to demonstrate that the referenced areas are not contamination sources at PA139.

1 INTRODUCTION

Bhate Environmental Associates, Inc., (Bhate) has been retained by the U.S. Army Corps of Engineers (USACE), Baltimore District, under Contract #W912DR-07-D-0039 Delivery Order No. 002, to perform Phase II Environmental Condition of Property (ECP) sampling activities in Support of Base Realignment and Closure (BRAC) of North Penn Memorial U.S. Army Reserve Center (USARC) at 1625 Berks Road in Norristown, Montgomery County, Pennsylvania (hereinafter referred to as PA139) (Figure 1-1). Bhate has teamed with Stell Environmental Enterprises, Inc. (SEE), to provide field and technical support for the project and PlanIt², Inc., to provide document quality assurance/quality control (QA/QC). The scope of services has been performed as discussed in the USACE Sampling Work Plan (Bhate, 2009).

1.1 Objectives

The primary objective of this Phase II ECP was to collect soil samples from Areas 1 through 5 at PA139 (Figure 1-2), in accordance with the *USACE Sampling Work Plan* (Bhate, 2009), to clearly identify the presence or absence of contamination above regulatory action levels. This Phase II ECP Report summarizes the results of the investigations, and the current subsurface soil conditions in Areas 1, 2, 3, and 5 and surface soil conditions in Area 4.

During the Phase II ECP investigation, required data were collected to support the designation of Areas 1 through 5 as uncontaminated parcels, by definition under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 120(hX4)(A). According to the Phase I ECP Report (CH2M Hill, 2007), the parcels (in addition to three additional parcels) were previously classified as Department of Defense (DoD) ECP Category 7 parcels in accordance with DoD policy defining the classifications (American Society of Testing and Materials [ASTM], 2005; and ASTM, 2010). The Pennsylvania Department of Environmental Protection (PADEP) requested clarification or further investigation at PA139 in the five following areas:

Area 1: Former 5,000-gallon diesel underground storage tank (UST)

Area 2: Former 1,000-gallon gasoline UST

Area 3: Former 20,000-gallon heating oil UST

Area 4: Storm drain ditch

Area 5: Former Fire Training Area (FTA) Burn

The ultimate objective of this Phase II ECP investigation was to determine whether or not a release had occurred in a given area, and whether a given area is a contamination source on PA139. Based on the data presented in this Phase II ECP Report, no contamination above regulatory action levels is present.

Within the ASTM Designation D 5746-98 (revised 2010) (ASTM, 2010), *Standard Classification of ECP Area Types for Defense Base Closure and Realignment Facilities*, and

ASTM D6008-96 (revised 2005) (ASTM, 2005), *Standard Practice for Conducting Environmental Baseline Surveys*, DoD ECP Category Types are defined as shown in Figure 1-3.

Figure 1-3: ECP Area Types for CERCLA and Petroleum-Product Contamination

The classifications for property contaminated with hazardous substances as defined by CERCLA and petroleum products are:

Category 1. Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).

Category 2. Areas where only release or disposal of petroleum products has occurred.

Category 3. Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.

Category 4. Areas where release, disposal, and/or migration of hazardous substances has occurred and where all remedial actions necessary to protect human health and the environment have been taken.

Category 5. Areas where release, disposal, and/or migration of hazardous substances has occurred and where removal or remedial actions are under way, but where all required remedial actions have not yet been taken.

Category 6. Areas where release, disposal, and/or migration of hazardous substances has occurred, but where required actions have not yet been implemented.

Category 7. Areas that have not been evaluated or require additional evaluation.

1.1.1 Purpose of the Phase II ECP Report

The Phase I ECP Report identified eight areas of potential environmental concern at PA139 (CH2M HILL, 2007). The site was given a Type 7 classification in accordance with DoD classification policy, indicating that additional evaluation was needed. On June 11, 2007, the PADEP issued a letter in response to the Phase I ECP Report (CH2M Hill, 2007) stating that two of the eight areas were resolved under the Cooperative Multi-Site Agreement and required no further action (Appendix A). PADEP stated that the Phase I ECP Report (CH2M Hill, 2007) failed to demonstrate that PA139 is uncontaminated, and requested that the Army provide additional documentation to support their conclusions that the property is uncontaminated in regard to the following areas:

1. Documentation and sample analysis confirming proper tank closures for USTs and aboveground storage tanks (ASTs) including the status of a 1,000-gallon unleaded gasoline UST;
2. Characterization of groundwater to demonstrate attainment of PADEP Act 2 regulatory standards;
3. Characterization and/or follow-up of the documented No. 2 heating oil spill near the potable well pump house to demonstrate attainment of an Act 2 standard. Additionally, characterization of an oil-like substance or sheen, which was reported flowing from the sewer outfall and within the drainage ditch in the southeastern portion of the property, would need to be documented to demonstrate compliance with applicable standards;
4. Characterization of the “spoils” reportedly associated with the sewage treatment plant upgrade;
5. Evaluate, assess, and remediate any releases associated with the FTA Burn Area; and
6. Additional characterization for the wash rack and related oil-water separator (OWS) to determine if a release has occurred.

A site meeting was held on July 29, 2009, with representatives from 99th Regional Support Command (RSC), PADEP, and SEE to discuss the areas of potential environmental concern listed in the PADEP Letter dated June 11, 2007 (Appendix A). The proposed site resolution to the six items listed above are as follows:

1. Agreed to provide documentation and sample analysis confirming proper tank closures for USTs through subsurface soil sample collection in the vicinity of the former 5,000-gallon diesel UST (Area 1, Figure 1-2), former 1,000-gallon gasoline UST (Area 2, Figure 1-2), and former 20,000-gallon diesel UST (Area 3, Figure 1-2).
2. Groundwater characterization at the site was deferred for further evaluation at a later date based on the results of this assessment.
3. Agreed to characterize the oil-like substance or sheen that was reportedly flowing from the sewer outfall and within the drainage ditch documented to demonstrate compliance through surface soil sample collection in the drainage ditch (Area 4, Figure 1-2).
4. The former sewage treatment facility “spoils” area was sampled in 2001 by CH2M Hill. No exceedences of PADEP ACT 2 regulatory standards were reported.
5. Agreed to evaluate and assess any releases associated with the FTA Burn Area through subsurface soil sample collection in the vicinity of the FTA Burn Area (Area 5, Figure 1-2).
6. The Organizational Maintenance Shop (OMS) service pit is encased in cement therefore sampling was not required.

Areas 1 through 5 and sample locations are depicted on Figure 1-2. Additionally, the Army has agreed to determine a path forward for site groundwater characterization if the results of the Phase II ECP subsurface soil investigation indicate a release in the soil at the site has occurred.

The purpose of this Phase II ECP at PA139 was to fulfill the PADEP request for additional data regarding areas of potential environmental concern identified in the Phase I ECP (CH2M Hill, 2007). This report presents the results of the additional site assessment as well as conclusions and recommendations. The work was performed on July 21-22, 2010, and October 28, 2010 to assess potential soil contamination within the areas identified on Figure 1-2.

1.1.2 Scope of Work

The following summary of the work performed under this Phase II ECP at PA139 is detailed in the *USACE Field Sampling Plan* (Bhate, 2009), and included the following:

- A subsurface soil investigation in Areas 1, 2, 3, and 5 conducted in accordance with the approved Sampling and Analysis (SAP) and Quality Assurance Project Plan (QAPP); and
- A surface soil investigation in Area 4 conducted in accordance with the approved SAP and QAPP; and
- Data analysis and validation, Phase II ECP Report preparation, and submittal to the USACE, and subsequently to PADEP.

1.2 Site Description and Historical Information

1.2.1 Site Description

PA139 is located at 1625 Berks Road in Norristown, Montgomery County, Pennsylvania (Figure 1-1). This site consists of approximately 19 acres of land and is developed with four permanent structures and three former Nike Ajax missile silos. The administrative (admin) building is approximately 45,000 square feet and is located on the southeastern portion of the property on Berks Road. A paved privately-owned vehicle (POV) parking lot is adjacent to and northwest of the admin building. A potable water well pump house, approximately 54 square feet, is located in the POV parking lot northeast of the sewage pump station and southeast of the existing 50,000-gallon AST. The OMS building is approximately 6,800 square feet and is located north of the POV parking lot within the paved military equipment parking (MEP) area. A former grease rack and wash rack are located in the MEP area east of the OMS Building. Three former missile silos/vaults are located between the OMS Building and the northwestern property boundary and are susceptible to occasional ponding water. The fourth structure is a storage building totaling approximately 707 square feet.

1.2.2 Phase I ECP Report Findings

Eight areas of environmental concern were identified at PA139 in the Phase I ECP Report. Detailed descriptions of the environmental concerns identified in the Phase I ECP Report as well as historical information pertaining to the site can be found in the Phase I ECP Report document (CH2M Hill, 2007). Briefly, they are as follows:

1. Groundwater impacts due to up gradient off-site superfund site (Transicoil, Inc./North Penn Area 12, EPA ID PAD057152365).
2. Former spoils area associated with the sewage plant upgrade.
3. Former leaking 1,500-gallon No. 2 heating oil UST.
4. Former 1,000-gallon gasoline UST.
5. No. 2 heating oil spill at AST next to the potable well pump house.
6. A former leaking 20,000-gallon No. 2 heating oil UST located northeast of the main building.
7. Drainage ditch at southeastern portion of the property.
8. Contamination associated with the site having been a former Nike missile battery.

1.3 Document Organization

The report is organized into the following Sections and appendices:

Section 1 – Introduction. This section discusses the objectives of the Phase II ECP Report and provides a site description.

Section 2 – Environmental Setting. This section provides a description of the physiography, topography, geology, and hydrogeology at the site.

Section 3 – Site Specific Results. This section provides a description of all field activities conducted for this Phase II ECP at PA139 as well as the analytical results of the subsurface soil investigation .

Section 4 – Conclusions and Recommendations. This section provides a summary of the data collected and recommendations based on the information collected during the field activities discussed in this Phase II ECP Report.

Section 5 – References. This section provides references used in this Phase II ECP Report.

The Tables and Figures referenced throughout this Phase II ECP Report at PA139 are included following the text (after Section 5).

Supporting documentation are provided in this report in the following order:

Appendix A PADEP Letter Issued June 11, 2007

Appendix B Soil Boring Logs

Appendix C Laboratory Analysis, Chain-of-Custody Documentation, and Data Validation Reports

Appendix D PADEP Short List of Petroleum Products

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2 ENVIRONMENTAL SETTING

2.1 Physiography and Topography

A description of the physiography and topography at PA139 is provided in the Phase I ECP Report (CH2M Hill, 2007).

2.2 Site Geology and Hydrogeology

A detailed description of the site geology and hydrology at PA139 is provided in the Phase I ECP Report (CH2M Hill, 2007).

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3 SITE SPECIFIC RESULTS

3.1 Soil Investigation

SEE mobilized to the site on July 21 and October 28, 2010. Field activities were conducted in Areas 1 through 5 at PA 139 (Figure 1-2) in accordance with the USACE Sampling Work Plan (Bhate, 2009) unless otherwise noted.

Subsurface soil samples in Areas 1, 2, 3, and 5 were collected using a track mounted Geoprobe[®] direct push technology (DPT) drill rig. Two-inch diameter acetate liners were used to collect continuous soil samples for visual classification in accordance with ASTM guidelines and headspace screening using a photoionization detector (PID). Continuous soil samples were screened at two-foot intervals in order to assist in the selection of the sample interval for laboratory analysis. With the exception of one location, all headspace screening results were 0.0 parts per million (ppm), in which case soil samples were collected based on the anticipated depth of the bottom of the former UST. Soil samples were named according to borehole number and sample interval, i.e. BH-01-1011 corresponds to a soil sample collected from 10 to 11 feet bgs from the BH-01 location as indicated on Figure 1-2. A composite surface soil sample was collected in Area 4 using a hand auger.

Soil samples were contained in clean glass jars sealed with Teflon-lined lids, and cooled to approximately 4 degrees Celsius. Soil samples and associated QC samples, included field duplicate samples, trip blank, and matrix spike/matrix spike duplicate (MS/MSD) samples, were submitted, by overnight courier, under chain-of-custody to TestAmerica Laboratories, in Pittsburgh, Pennsylvania for analysis. Soil samples were analyzed for the target analytes listed in Table 4-1 of the approved QAPP.

The laboratory analytical results were validated by Ms. Marcia Olive, Bhate Environmental Associates, Inc. in Denver, Colorado. Laboratory analytical results were compared to PADEP Act 2 Medium Specific Concentration (MSC) generic soil to non-use aquifer values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication in PADEP, 2008).

A summary of field activities and analytical results specific to each Area are provided below. Soil boring logs are provided in Appendix B of this report. Laboratory analytical reports, chain-of-custody documentation, and data validation reports are provided in Appendix C of this report.

3.1.1 Area 1 – Former 5,000-gallon Diesel UST

3.1.1.1 Subsurface Soil Investigation

Soil sampling activities were conducted in Area 1, identified on Figure 1-2, on July 21, 2010. Four soil boring locations were proposed in the USACE Sampling Work Plan; however, no

disturbances were observed in the parking lot surface to indicate the excavation and removal of a UST. Since there was no indication that a UST was removed from the POV parking lot, the sample locations were moved north of the proposed locations into the grassy area between the POV parking lot and the ditch in front of the OMS Building. Soil samples were collected from three locations in lieu of the proposed four locations with prior approval from the 99th RSC. Three soil borings (BH-01 through BH-03) were advanced using a track mounted Geoprobe® DPT drill rig to a depth of approximately 15 feet (ft) below ground surface (bgs) in the vicinity of the former 5,000-gallon diesel UST. Three subsurface soil samples (BH-01-1011, BH-02-0910, and BH-03-0910) were collected and analyzed for the target analytes listed on the PADEP Short List of Petroleum Products for Diesel Fuel/Fuel Oil No. 2 revised March 18, 2008 (Appendix D), by U.S. Environmental Protection Agency (USEPA) Method 8260B.

3.1.1.2 Investigation Derived Waste

Soil cuttings were placed in the soil boring holes. According to SEE, decontamination water was properly disposed of by the drilling subcontractor. No additional investigation derived waste was generated at PA139.

3.1.1.3 Sampling Results

A summary of the analytical laboratory results at Area 1 is provided in Table 3-1. Based on the laboratory analytical reports, target analytes were not detected in the three soil samples above laboratory reporting limits; therefore, no constituent concentrations exceeded PADEP Act 2 MSC values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication in PADEP, 2008).

3.1.2 Area 2 – Former 1,000-gallon Gasoline UST

3.1.2.1 Field Activities

Soil sampling activities were conducted in Area 2, identified on Figure 1-2, on October 28, 2010. Four soil boring locations were proposed in the vicinity of the approximate location of the former 1,000-gallon UST in the USACE Sampling Work Plan; however, six soil borings were advanced during mobilization on October 28, 2010. Additional borings were placed in the center of the former UST tankhold and downgradient of the former UST in order to gather additional data points in the vicinity of the former 1,000-gallon UST. The six soil boring locations (BH-24 through BH-29) were advanced using a track mounted Geoprobe® DPT drill rig to approximate depths ranging from 9 to 10 ft bgs. Non-native soil was observed in the suspected former tankhold prior to refusal, which is consistent with backfill procedures indicated in the UST Closure Report provided in the Phase I ECP Report (CH2M Hill, 2007). Five subsurface soil samples (BH-25-0910, BH-26-0910, BH-27-0910, BH-28-0910, and BH-29-0910) were collected and analyzed by USEPA Methods 8260B and 6010B for the target analytes listed on

the PADEP Short List of Petroleum Products for Leaded Gasoline, Aviation Gasoline, and Jet Fuel revised on March 18, 2008.

3.1.2.2 Investigation Derived Waste

Soil cuttings were placed in the soil boring holes. Decontamination water was properly disposed of by the drilling subcontractor. No additional investigation derived waste was generated at PA139.

3.1.2.3 Results

A summary of the analytical laboratory results at Area 2 is provided on Table 3-2. Based on the laboratory analytical reports, naphthalene was detected in BH-25-0910, BH-26-0910 and BH-27-0910 at a concentration ranging from 0.002 milligrams per kilogram (mg/kg) to 0.015 mg/kg. Lead was detected in all five subsurface soil samples at concentrations ranging from 12.0 mg/kg to 21.1 mg/kg. Naphthalene and lead results in subsurface soil are included on Figure 3-1. Naphthalene and lead concentrations detected in subsurface soil were not in excess of the PADEP Act 2 MSC value generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication PADEP, 2008).

3.1.3 Area 3 – Former 20,000-gallon Diesel UST

3.1.3.1 Field Activities

Soil sampling activities were conducted in Area 3, identified on Figure 1-2, on July 21, 2010. Five soil borings (BH-11 through BH-15) were advanced using a track mounted Geoprobe[®] to depths ranging from approximately 9 to 15 ft bgs in the vicinity of the former 20,000-gallon diesel UST. Five subsurface soil samples (BH-11-0910, BH-12-1011, BH-13-0809, BH-14-0910, and BH-15-0911) were collected and analyzed by USEPA Method 8260B for the target analytes listed on the PADEP Short List of Petroleum Products for Diesel Fuel/Fuel Oil No. 2 revised on March 18, 2008.

3.1.3.2 Investigation Derived Waste

Soil cuttings were placed in the soil boring holes. Decontamination water was properly disposed of by the drilling subcontractor. No additional investigation derived waste was generated at PA139.

3.1.3.3 Results

A summary of the analytical laboratory results is provided on Table 3-3. Based on the laboratory analytical reports, target analytes were not detected in soil samples above laboratory reporting limits; therefore, no constituent concentrations exceeded PADEP Act 2 MSC values generated in

accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication in PADEP, 2008).

3.1.4 Area 4 – Storm Drain Ditch

3.1.4.1 Field Activities

Soil sampling activities were conducted in Area 4, identified on Figure 1-2, on July 21, 2010. One composite surface soil sample (BH-16) was collected from the storm drain ditch. The composite sample consisted of four subsample aliquots collected from an approximate depth of 0 to 2 ft bgs using a hand auger in the vicinity of the location identified in Area 4 on Figure 1-2. The surface soil sample was analyzed by USEPA Methods 8270C and 9071B for SVOCs and Total petroleum hydrocarbon (TPH).

3.1.4.2 Investigation Derived Waste

Soil cuttings were placed in the soil boring holes. Decontamination water was properly disposed of by the drilling subcontractor. No additional investigation derived waste was generated at PA139.

3.1.4.3 Results

A summary of the analytical laboratory results is provided in Table 3-4. Based on the laboratory analytical reports, semi-volatile organic compounds (SVOCs) were detected in the composite surface soil sample at concentrations below their respective PADEP Act 2 MSCs. TPH was detected at a concentration of 1,340 mg/kg. TPH does not have a PADEP Act 2 MSC. SVOC and TPH analytical results for detected concentrations in surface soil in Area 4 is included on Figure 3-2.

3.1.5 Area 5 – Former FTA burn area

3.1.5.1 Field Activities

Soil sampling activities were conducted in Area 5, identified on Figure 1-2, on July 22, 2010. Four soil borings (BH-20 through BH-23) were advanced using a track mounted Geoprobe[®] to approximate depths of 5 ft bgs in the vicinity of the former FTA burn area. Four subsurface soil samples (BH-20-0405, BH-21-0405, BH-22-0405, and BH-23-0405) were collected and analyzed by USEPA Methods 8260B, 8270C, and 9071B for VOCs, SVOCs, and TPH.

3.1.5.2 Investigation Derived Waste

Soil cuttings were placed in the soil boring holes. Decontamination water was properly disposed of by the drilling subcontractor. No additional investigation derived waste was generated at PA139.

3.1.5.3 Results

A summary of the analytical laboratory results is provided in Table 3-5. Based on the laboratory analytical reports, SVOCs were detected in subsurface soil samples at concentrations below their respective PADEP Act 2 MSCs. VOCs and TPH were not detected in soil samples above laboratory reporting limits; therefore, no constituent concentrations exceeded PADEP Act 2 MSC values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication in PADEP, 2008). SVOC analytical results for detected concentrations in subsurface soil in Area 4 is included on Figure 3-3.

3.2 Data Quality Evaluation

The analytical data was validated against the laboratory's QA/QC limits using the guidelines and practices published in the *USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review* (USEPA, 2008), and in the *USEPA Contract Laboratory Program National Functional Guidelines for Superfund Inorganic Data Review* (USEPA, 2010). All samples were properly preserved and transferred under chain-of-custody to the laboratory for analysis, and all samples were analyzed within the required holding time. No breakage occurred during transport.

The analytical data is suitable for the intended data usage. All analyses were performed, and the data met the required QC criteria except where noted in the Laboratory Validation Reports. The data is 100% complete. The reasons for qualification of certain data are provided in the Data Validation Reports in Appendix C of this report.

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4 CONCLUSIONS AND RECOMMENDATIONS

As described in Section 1.1.1 of this report, two of the eight areas of potential environmental concern were resolved under the Cooperative Multi-Site Agreement and required no further action. Additionally, groundwater characterization within the areas assessed was deferred for further evaluation at a later date based on the results of this assessment. Subsurface soil investigations were performed in Areas 1, 2, 3, and 5 and a surface soil investigation was performed in Area 4 to clearly identify the presence or absence of contamination above regulatory action levels.

The analytical results from the soil samples collected at PA139 in Areas 1 through 5 depicted on Figure 1-2, did not contain target constituent concentrations in excess of their respective PADEP Act 2 MSC generic soil to non-use aquifer values generated in accordance with Section II.B.3.b of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (original publication in PADEP, 2002; latest publication in PADEP, 2008).

Bhate recommends that the Army request concurrence from PADEP that analytical data submitted in this Phase II ECP Report for Areas 1 through 5 is sufficient to demonstrate that the referenced areas are not contamination sources at PA139.

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5 REFERENCES

ASTM. 2005. Designation: D 6008-96, *Standard Practice for Conducting Environmental Baseline Surveys*. Revised 2005.

ASTM. 2006a. *Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System) (D 2487)*.

ASTM. 2006b. *Standard Practice for Description and Identification of Soils (Visual-Manual Procedure (D 2488))*.

ASTM. 2010. Designation: D 5746-98, *Standard Classification of ECP Area Types for Defense Base Closure and Realignment Facilities*. Revised 2010.

Bhate Environmental Associates, Inc. August 2002. *Bhate Standard Operating Procedures*.

Bhate Environmental Associates, Inc. December 2009. *Sampling Work Plan Phase II Environmental Condition of Property in Support of Base Realignment and Closure of Four U.S. Army Reserve Centers in Pennsylvania*.

CH2M Hill. February 2007. *Final Environmental Condition of Property Report*.

Pennsylvania Department of Environmental Protection (PADEP). March 14, 2008. *Pennsylvania's Land Recycling Program Technical Guidance Manual*.

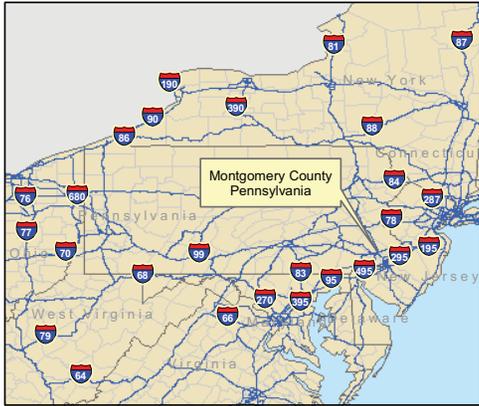
USACE. September 2008. *Safety: Safety and Health Requirements Manual EM 385-1-1*.

USEPA. June 2008. *USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review*.

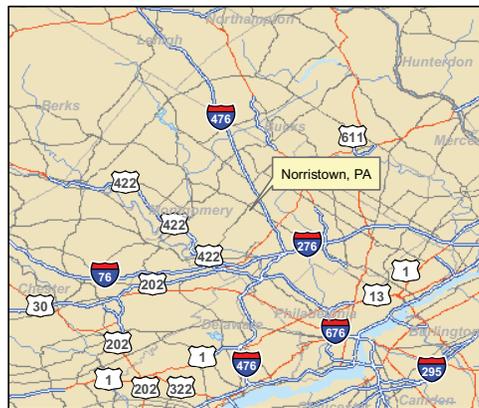
USEPA. January 2010. *USEPA Contract Laboratory Program National Functional Guidelines for Superfund Inorganic Data Review*.

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FIGURES



Map of Pennsylvania



Map of Montgomery County



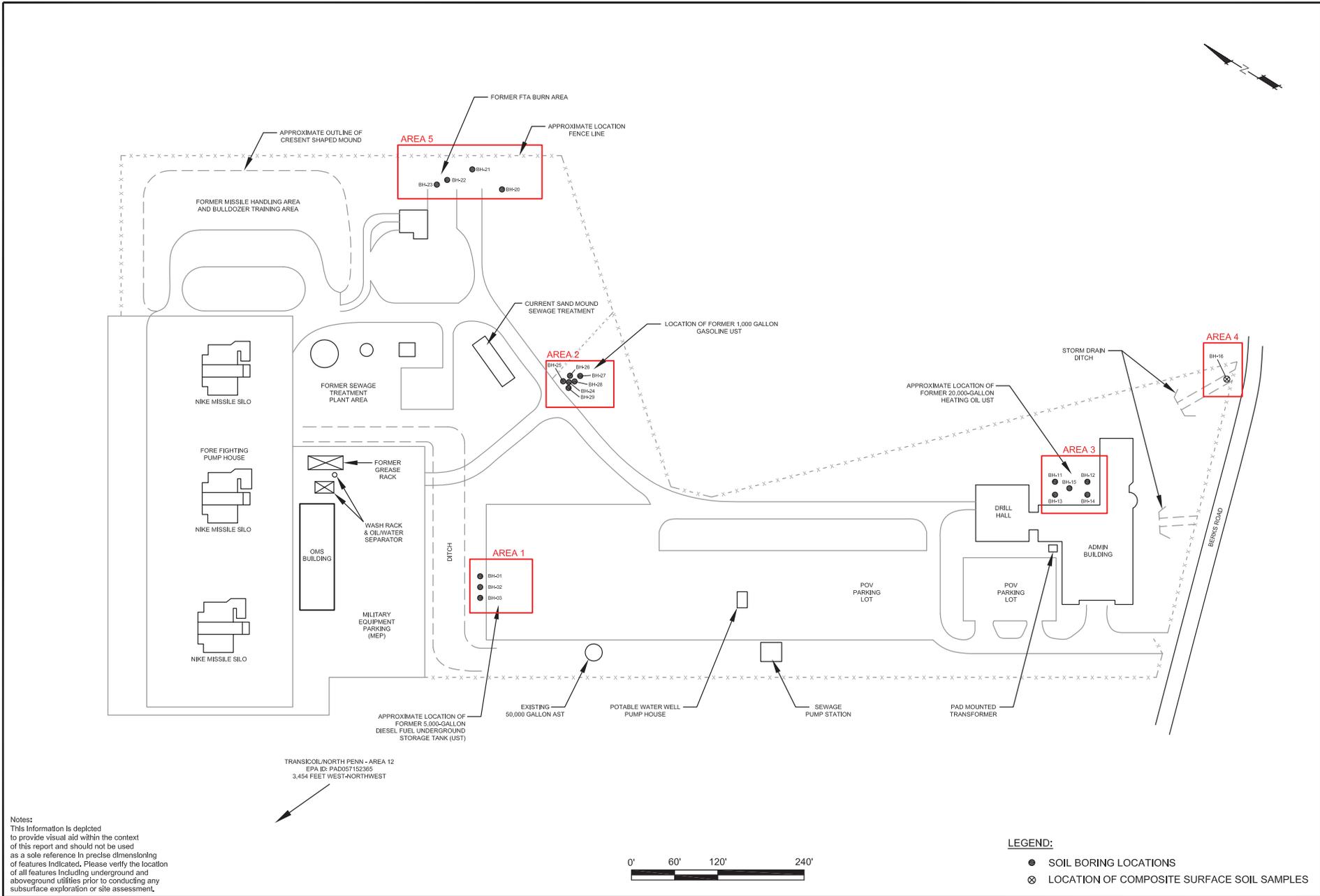
North Penn Memorial USARC

PA 139
North Penn Memorial USARC
1625 Berks Road
Norristown, Montgomery County, PA 19403
Contract No. W912DR-07-D-0039
Delivery Order No. 002
Figure 1-1

SITE VICINITY AND LOCATION MAP

PROJECT NO:	9080148
SCALE:	AS SHOWN
DATE:	01/17/11
DRAWN BY:	MRM
DRAWING NO:	9080148-01



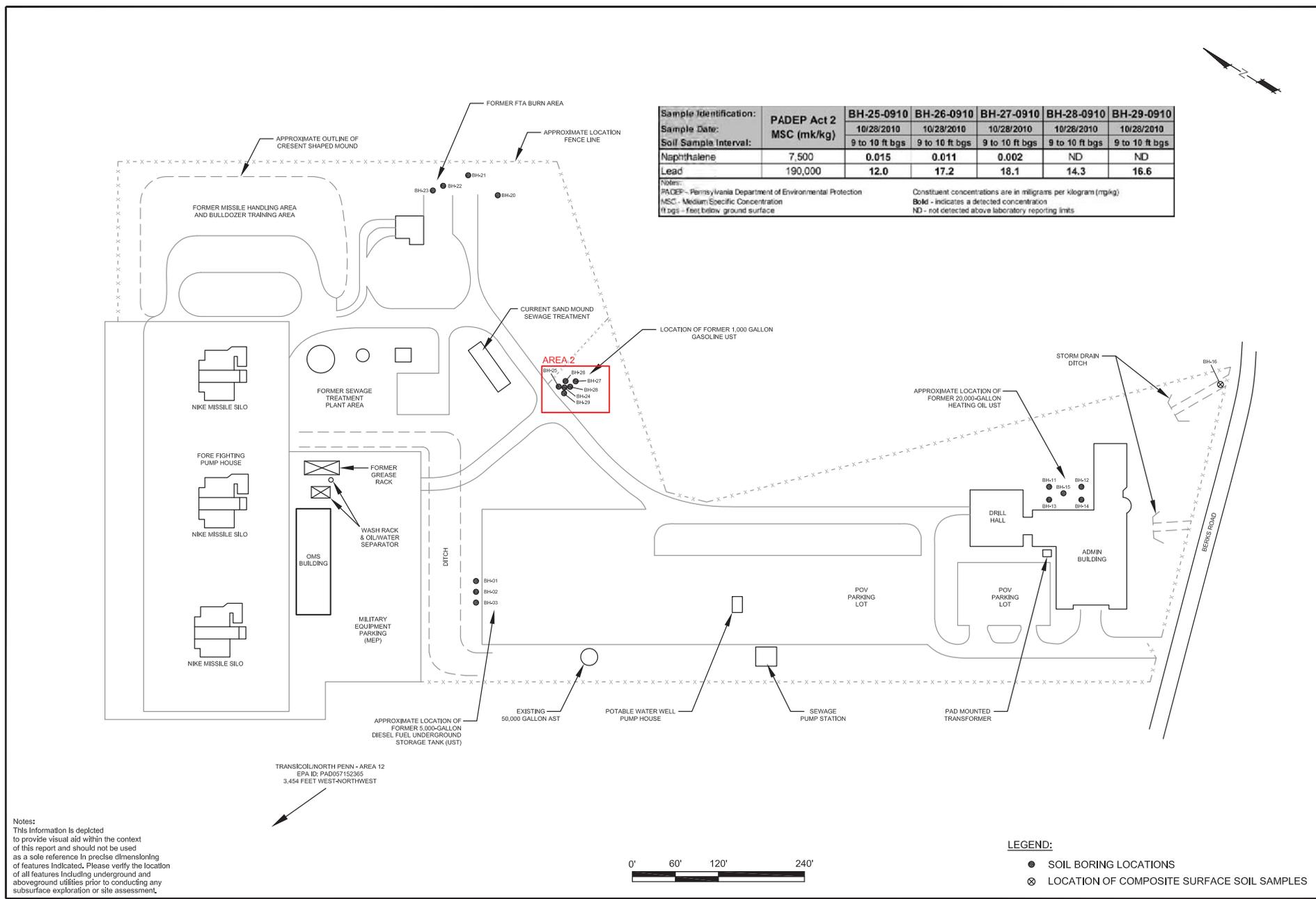


PA 139
 North Penn Memorial USARC
 1625 Berks Road
 Norristown, Montgomery County, PA 19403
 Contract No. W912DR-07-D-0039
 Delivery Order No. 002

SITE MAP		Source: CH2M Hill, 2007	
PROJECT NO:	9080148	DATE:	01/17/11
SCALE:	1" = 120'	DRAWN BY:	MFRM
		DRAWING NO.:	9080148-02



Figure 1-2



PA 139
 North Penn Memorial USARC
 1625 Berks Road
 Norristown, Montgomery County, PA 19403
 Contract No. W912DR-07-D-0039
 Delivery Order No. 002

NAPHTHALENE AND LEAD RESULTS FOR DETECTED CONCENTRATIONS IN SUBSURFACE SOIL FOR AREA 2

Source: CH2M Hill, 2007

SCALE: 1" = 120'

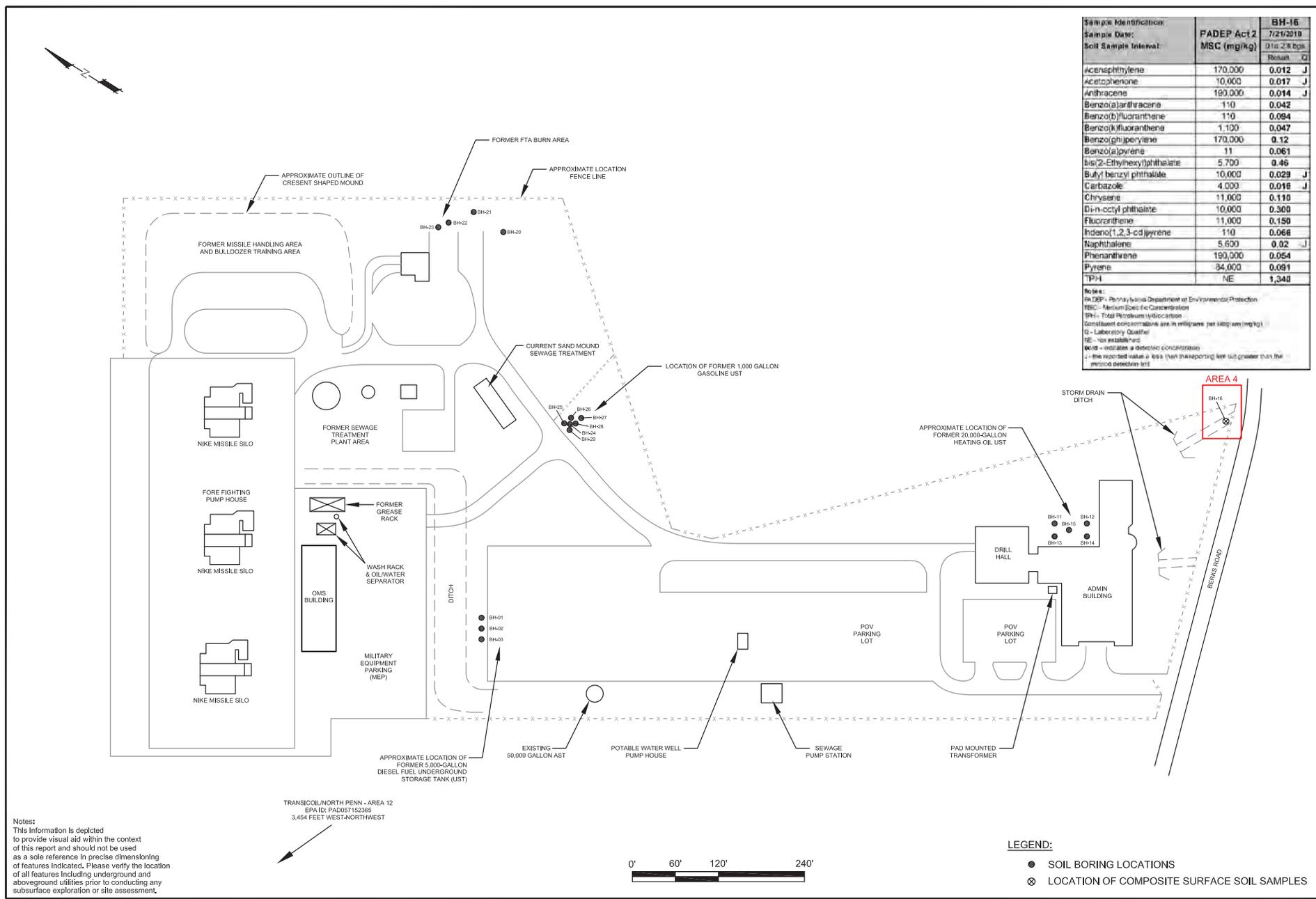
DATE: 01/17/11

PROJECT NO: 9080148

DRAWN BY: MFM
 DRAWING NO: 9080148-03



Figure 3-1

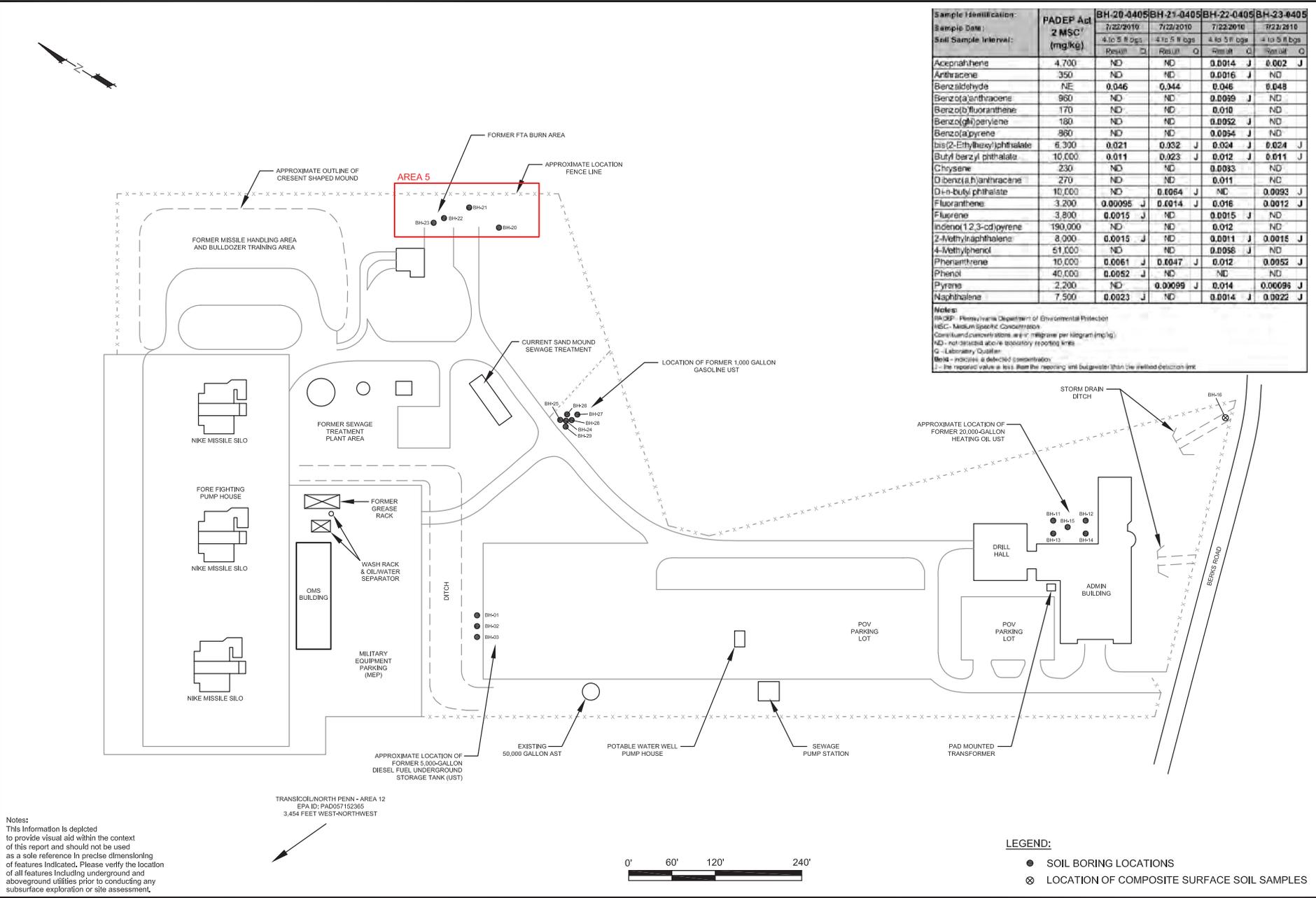


PA 139
 North Penn Memorial USARC
 1625 Berks Road
 Norristown, Montgomery County, PA 19403
 Contract No. W912DR-07-D-0039
 Delivery Order No. 002
 Figure 3-2

SVOC AND TPH ANALYTICAL RESULTS FOR DETECTED CONCENTRATIONS IN SURFACE SOIL FOR AREA 4

PROJECT NO: CH2M Hill, 2007
 SCALE: 1" = 120'
 DATE: 01/17/11
 DRAWN BY: MFM
 DRAWING NO: 9080148-04

bhate
 associates
 ENGINEERING, SCIENCE AND CONSTRUCTION



PA 139
 North Penn Memorial USARC
 1625 Berks Road
 Norristown, Montgomery County, PA 19403
 Contract No. W912DR-07-D-0039
 Delivery Order No. 002

Figure 3-3

SVOC ANALYTICAL RESULTS FOR DETECTED CONCENTRATIONS IN SUBSURFACE SOIL FOR AREA 5

PROJECT NO: 9080148
 SCALE: 1" = 120'
 DATE: 01/17/11
 DRAWN BY: MFM
 DRAWING NO: 9080148-05

bhate
 associates
 ENGINEERING, SCIENCE AND CONSTRUCTION

TABLES

Table 3-1
Summary of Soil Sample Analytical Results in Area 1
 North Penn Memorial USARC (PA 139)
 Norristown, Montgomery County, Pennsylvania
 Bhate Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mg/kg)	BH-01-1011	BH-02-0910	BH-03-0910
			C0G220587-008	C0G220587-009	C0G220587-010
			7/21/2010	7/21/2010	7/21/2010
			10 to 11 ft bgs	9 to 10 ft bgs	9 to 10 ft bgs
VOCs² Analyzed by EPA Method 8260B (mg/kg)					
Benzene	71-43-2	50	< 0.0083	< 0.0071	< 0.0068
Ethylbenzene	100-41-4	7,000	< 0.0083	< 0.0071	< 0.0068
Isopropylbenzene (Cumene)	98-82-8	10,000	< 0.0083	< 0.0071	< 0.0068
Methyl tert-butyl ether	1634-04-4	20	< 0.0083	< 0.0071	< 0.0068
Naphthalene	91-20-3	7,500	< 0.0083	< 0.0071	< 0.0068
Toluene	108-88-3	10,000	< 0.0083	< 0.0071	< 0.0068
1,2,4-Trimethylbenzene	95-63-6	360	< 0.0083	< 0.0071	< 0.0068
1,3,5-Trimethylbenzene	108-67-8	6.2	< 0.0083	< 0.0071	< 0.0068

Notes:

CAS - Chemical Abstracts Service

PADEP - Pennsylvania Department of Environmental Protection

MSC - Medium Specific Concentration

¹ PADEP MSCs for generic soil to non-use aquifer were generated in accordance with Section II.B.3.b. of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (PADEP, 2008).

² Samples were analyzed only for constituents listed on the PADEP Short List of Petroleum Products for Diesel Fuel/Fuel Oil No. 2 revised March 18, 2008

VOC - Volatile Organic Compounds

EPA - Environmental Protection Agency

All constituent concentrations are reported in milligrams per kilogram (mg/kg)

Table 3-2
Summary of Soil Sample Analytical Results in Area 2
 North Penn Memorial USARC (PA 139)
 Norristown, Montgomery County, Pennsylvania
 Bhate Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mk/kg)	BH-25-0910	BH-26-0910	BH-27-0910	BH-28-0910	BH-29-0910	QC-01 ³						
			C0J290561-001	C0J290561-002	C0J290561-003	C0J290561-004	C0J290561-005	C0J290561-006						
			10/28/2010	10/28/2010	10/28/2010	10/28/2010	10/28/2010	10/28/2010						
			9 to 10 ft bgs											
VOCs² Analyzed by EPA Method 8260B (mg/kg)			Result	Q	Result	Q	Result	Q	Result	Q				
Benzene	71-43-2	50	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
1,2-Dibromoethane	106-93-4	0.5	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
1,2-Dichloroethane	107-06-2	5	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
Ethylbenzene	100-41-4	7,000	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
Isopropylbenzene (Cumene)	98-82-8	10,000	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
Naphthalene	91-20-3	7,500	0.015	B	0.011	J,B	0.002	J,B	< 0.0065		< 0.0055		< 0.006	
Toluene	108-88-3	10,000	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
1,2,4-Trimethylbenzene	95-63-6	360	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
1,3,5-Trimethylbenzene	108-67-8	6.2	< 0.005		< 0.0056		< 0.0047		< 0.0065		< 0.0055		< 0.006	
Xylenes (total)	1330-20-7	10,000	< 0.015		< 0.017		< 0.020		< 0.020		< 0.016		< 0.018	
Lead Analyzed by EPA Method 6010B (mg/kg)														
Lead	7439-92-1	190,000	12.0		17.2		18.1		14.3		16.6		21.1	

Notes:

CAS - Chemical Abstracts Service

PADEP - Pennsylvania Department of Environmental Protection

MSC - Medium Specific Concentration

¹ PADEP MSCs for generic soil to non-use aquifer were generated in accordance with Section II.B.3.b. of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (PADEP, 2008).

² Samples were analyzed only for constituents listed on the PADEP Short List of Petroleum Products for Leaded Gasoline, Aviation Gasoline, and Jet Fuel revised March 18, 2008

VOC - Volatile Organic Compounds

EPA - Environmental Protection Agency

All constituent concentrations are reported in milligrams per kilogram (mg/kg)

Q - laboratory qualifier

Bold - indicates a detected concentration

J - the reported value is less than the reporting limit but greater than the method detection limit.

B - compound was detected in the method blank

Table 3-3
Summary of Soil Sample Analytical Results in Area 3
 North Penn Memorial USARC (PA 139)
 Norristown, Montgomery County, Pennsylvania
 Bhate Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mg/kg)	BH-11-0910	BH-12-1011	BH-13-0809	BH-14-0910	BH-15-0911	BH-00-0910 ²
			C0G220587-005	C0G220587-001	C0G220587-004	C0G220587-002	C0G220587-003	C0G220587-005
			7/21/2010	7/21/2010	7/21/2010	7/21/2010	7/21/2010	7/21/2010
			9 to 10 ft bgs	10 to 11 ft bgs	8 to 9 ft bgs	9 to 10 ft bgs	9 to 11 ft bgs	9 to 10 ft bgs
VOCs ³ Analyzed by EPA Method 8260B (mg/kg)			Result	Result	Result	Result	Result	Result
Benzene	71-43-2	50	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062
Ethylbenzene	100-41-4	7,000	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062
Isopropylbenzene (Cumene)	98-82-8	10,000	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062
Methyl tert-butyl ether	1634-04-4	20	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062
Naphthalene	91-20-3	7,500	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062
Toluene	108-88-3	10,000	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062
1,2,4-Trimethylbenzene	95-63-6	360	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062
1,3,5-Trimethylbenzene	108-67-8	6.2	< 0.0066	< 0.007	< 0.0062	< 0.0071	< 0.0068	< 0.0062

Notes:

CAS - Chemical Abstracts Service

PADEP - Pennsylvania Department of Environmental Protection

MSC - Medium Specific Concentration

¹ PADEP MSCs for generic soil to non-use aquifer were generated in accordance with Section II.B.3.b. of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (PADEP, 2008).

² BH-00 is a duplicate of BH-11-0910

³ Samples were analyzed only for constituents listed on the PADEP Short List of Petroleum Products for Diesel Fuel/Fuel Oil No. 2 revised March 18, 2008

VOC - Volatile Organic Compounds

EPA - Environmental Protection Agency

All constituent concentrations are reported in milligrams per kilogram (mg/kg)

Table 3-4
Summary of Soil Sample Analytical Results in Area 4
North Penn Memorial USARC (PA 139)
Norrilstown, Montgomery County, Pennsylvania
Bhate Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mg/kg)	BH-16		BH-000 ²	
			C0G220587-007		C0G220587-007	
			7/21/2010		7/21/2010	
			0 to 2 ft bgs		0 to 2 ft bgs	
SVOCs Analyzed by EPA Method 8270C (mg/kg)			Result	Q	Result	Q
Acenaphthene	83-32-9	170,000	< 0.042		< 0.039	
Acenaphthylene	208-96-8	170,000	0.012	J	0.0098	J
Acetophenone	98-86-2	10,000	0.017	J	< 0.190	
Anthracene	120-12-7	190,000	0.014	J	0.016	J
Atrazine	1912-24-9	360	< 0.210		< 0.190	
Benzaldehyde	100-52-7	NE	< 0.210		< 0.190	
Benzo(a)anthracene	56-55-3	110	0.042		0.065	
Benzo(b)fluoranthene	50-32-8	110	0.094		0.120	
Benzo(k)fluoranthene	205-99-2	1,100	0.047		0.052	
Benzo(ghi)perylene	191-24-2	170,000	0.12		0.080	
Benzo(a)pyrene	207-08-9	11	0.061		0.080	
1,1'-Biphenyl	92-52-4	140,000	< 0.210		< 0.190	
bis(2-Chloroethoxy)methane	111-91-1	NE	< 0.210		< 0.190	
bis(2-Chloroethyl)ether	111-44-4	5	< 0.042		< 0.039	
bis(2-Ethylhexyl)phthalate	39638-32-9	5,700	0.46		0.140	J
4-Bromophenyl phenyl ether	117-81-7	NE	< 0.210		< 0.190	
Butyl benzyl phthalate	101-55-3	10,000	0.029	J	0.027	J
Caprolactam	85-68-7	NE	<1.100		< 1.000	
Carbazole	105-60-2	4,000	0.016	J	0.017	J
4-Chloroaniline	86-74-8	11,000	< 0.210		< 0.190	
4-Chloro-3-methylphenol	59-50-7	14,000	< 0.210		< 0.190	
2-Chloronaphthalene	106-47-8	190,000	< 0.042		< 0.039	
2-Chlorophenol	91-58-7	920	< 0.210		< 0.190	
4-Chlorophenyl phenyl ether	95-57-8	NE	< 0.210		< 0.190	
Chrysene	7005-72-3	11,000	0.110		0.130	
Dibenz(a,h)anthracene	218-01-9	11	< 0.042		0.045	
Dibenzofuran	95-48-7	NE	< 0.210		< 0.190	
Di-n-butyl phthalate	106-44-5	10,000	< 0.210		< 0.190	
3,3'-Dichlorobenzidine	53-70-3	180	< 0.210		< 0.190	
2,4-Dichlorophenol	132-64-9	8,400	< 0.042		< 0.039	
Diethyl phthalate	91-94-1	10,000	< 0.210		0.033	J
2,4-Dimethylphenol	120-83-2	10,000	< 0.210		< 0.190	
Dimethyl phthalate	84-66-2	NE	< 0.210		< 0.190	
4,6-Dinitro-2-methylphenol	105-67-9	NE	<1.100		< 1.000	
2,4-Dinitrophenol	131-11-3	5,600	<1.100		< 1.000	
2,4-Dinitrotoluene	84-74-2	260	< 0.210		< 0.190	
2,6-Dinitrotoluene	534-52-1	2,800	< 0.210		< 0.190	
Di-n-octyl phthalate	51-28-5	10,000	0.300		< 0.190	
Fluoranthene	121-14-2	11,000	0.150		0.180	
Fluorene	606-20-2	11,000	< 0.042		< 0.039	
Hexachlorobenzene	206-44-0	50	< 0.042		< 0.039	
Hexachlorobutadiene	86-73-7	560	< 0.042		< 0.039	
Hexachlorocyclopentadiene	118-74-1	10,000	< 0.210		< 0.190	
Hexachloroethane	87-68-3	2,800	< 0.210		< 0.190	
Indeno(1,2,3-cd)pyrene	77-47-4	110	0.066		0.057	
Isophorone	67-72-1	10,000	< 0.210		< 0.190	
2-Methylnaphthalene	193-39-5	10,000	< 0.042		< 0.039	
2-Methylphenol	78-59-1	NE	< 0.210		< 0.190	
4-Methylphenol	91-57-6	NE	< 0.210		< 0.190	
Naphthalene	91-20-3	5,600	0.02	J	< 0.039	
2-Nitroaniline	88-74-4	160	<1.100		< 1.000	
3-Nitroaniline	99-09-2	160	<1.100		< 1.000	
4-Nitroaniline	100-01-6	160	<1.100		< 1.000	
Nitrobenzene	98-95-3	1,400	< 0.042		< 0.390	
2-Nitrophenol	88-75-5	22,000	< 0.210		< 0.190	
4-Nitrophenol	100-02-7	22,000	<1.100		< 1.000	
N-Nitrosodiphenylamine	621-64-7	16,000	< 0.210		< 0.190	

Table 3-4
Summary of Soil Sample Analytical Results in Area 4
 North Penn Memorial USARC (PA 139)
 Norristown, Montgomery County, Pennsylvania
 Bhate Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mg/kg)	BH-16		BH-000 ²	
			C0G220587-007		C0G220587-007	
			7/21/2010		7/21/2010	
			0 to 2 ft bgs		0 to 2 ft bgs	
SVOCs Analyzed by EPA Method 8270C (mg/kg)			Result	Q	Result	Q
N-Nitrosodi-n-propylamine	86-30-6	11	< 0.042		< 0.039	
2,2'-oxybis(1-Chloropropane)	117-84-0	NE	< 0.042		< 0.039	
Pentachlorophenol	87-86-5	660	< 0.210		< 0.190	
Phenanthrene	85-01-8	190,000	0.054		0.065	
Phenol	108-95-2	190,000	< 0.042		< 0.039	
Pyrene	129-00-0	84,000	0.091		0.120	
2,4,5-Trichlorophenol	95-95-4	190,000	< 0.210		< 0.190	
2,4,6-Trichlorophenol	88-06-2	840	< 0.210		< 0.190	
Total Petroleum Hydrocarbon Analyzed by EPA Method 9071B (mg/kg)						
Total Petroleum Hydrocarbon	--	NE	1,340		1,310	

Notes:

CAS - Chemical Abstracts Service

PADEP - Pennsylvania Department of Environmental Protection

MSC - Medium Specific Concentration

¹ PADEP MSCs for generic soil to non-use aquifer were generated in accordance with Section II.B.3.b. of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (PADEP, 2008).

² BH-000 is a duplicate of BH-16

SVOC - Semi-volatile Organic Compounds

EPA - Environmental Protection Agency

All constituent concentrations are reported in milligrams per kilogram (mg/kg)

Q - Laboratory Qualifier

NE - not established

Bold - indicates a detected concentration

J - the reported value is less than the reporting limit but greater than the method detection limit

Table 3-5
Summary of Soil Sample Analytical Results in Area 5
North Penn Memorial USARC (PA 136)
Norristown, Montgomery County, Pennsylvania
Bhate Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mg/kg)	BH-20-0405	BH-21-0405	BH-22-0405	BH-23-0405			
			COG240465-013	COG240465-002	COG240465-004	COG240465-014			
			7/22/2010	7/22/2010	7/22/2010	7/22/2010			
			4 to 5 ft bgs	4 to 5 ft bgs	4 to 5 ft bgs	4 to 5 ft bgs			
SVOCs Analyzed by EPA Method 8270C (mg/kg)			Result	Q	Result	Q	Result	Q	
Acenaphthene	83-32-9	4,700	<0.008	< 0.0075	0.0014 J	J	0.0020 J	J	
Acenaphthylene	208-96-8	18,000	<0.008	< 0.0075	<0.008		<0.0081		
Acetophenone	98-86-2	1,000	<0.039	< 0.037	<0.039		<0.040		
Anthracene	120-12-7	350	<0.008	< 0.0075	0.0016 J	J	<0.0081		
Atrazine	1912-24-9	0.3	<0.039	< 0.037	<0.039		<0.040		
Benzaldehyde	100-52-7	NE	0.046	0.044	0.046		0.048		
Benzo(a)anthracene	56-55-3	960	<0.008	< 0.0075	0.0069 J	J	<0.0081		
Benzo(b)fluoranthene	205-99-2	170	<0.008	< 0.0075	0.010		<0.0081		
Benzo(k)fluoranthene	207-08-9	610	<0.008	< 0.0075	<0.008		<0.0081		
Benzo(ghi)perylene	191-24-2	180	<0.008	< 0.0075	0.0052	J	<0.0081		
Benzo(a)pyrene	50-32-8	860	<0.008	< 0.0075	0.0064	J	<0.0081		
1,1'-Biphenyl	92-52-4	3,100	<0.039	< 0.037	<0.039		<0.040		
bis(2-Chloroethoxy)methane	111-91-1	NE	<0.039	< 0.037	<0.039		<0.040		
bis(2-Chloroethyl)ether	111-44-4	5.5	<0.008	< 0.037	<0.008		<0.040		
bis(2-Ethylhexyl)phthalate	117-81-7	6,300	0.021	0.032	0.024	J	0.024	J	
4-Bromophenyl phenyl ether	101-55-3	NE	<0.039	< 0.037	<0.039		<0.040		
Butyl benzyl phthalate	85-68-7	10,000	0.011	0.023	0.012	J	0.011	J	
Caprolactam	105-60-2	NE	<0.200	< 0.190	<0.200		<0.200		
Carbazole	86-74-8	760	<0.008	< 0.0075	<0.008		<0.0081		
4-Chloroaniline	106-47-8	52	<0.039	< 0.037	<0.039		<0.040		
4-Chloro-3-methylphenol	59-50-7	110	<0.039	< 0.037	<0.039		<0.040		
2-Chloronaphthalene	91-58-7	18,000	<0.008	< 0.0075	<0.008		<0.0081		
2-Chlorophenol	95-57-8	4.4	<0.039	< 0.037	<0.039		<0.040		
4-Chlorophenyl phenyl ether	7005-72-3	NE	<0.039	< 0.037	<0.039		<0.040		
Chrysene	218-01-9	230	<0.008	< 0.0075	0.0083		<0.0081		
Dibenz(a,h)anthracene	53-70-3	270	<0.008	< 0.0075	0.011		<0.0081		
Dibenzofuran	132-64-9	NE	<0.039	< 0.037	<0.039		<0.040		
Di-n-butyl phthalate	84-74-2	10,000	<0.039	0.0064	0.0064	J	<0.039	0.0093	J
3,3'-Dichlorobenzidine	91-94-1	17,000	<0.039	< 0.037	<0.039		<0.040		
2,4-Dichlorophenol	120-83-2	2,000	<0.008	< 0.0075	<0.008		<0.0081		
Diethyl phthalate	84-66-2	10,000	<0.039	< 0.037	<0.039		<0.040		
2,4-Dimethylphenol	105-67-9	10,000	<0.039	< 0.037	<0.039		<0.040		
Dimethyl phthalate	131-11-3	NE	<0.039	< 0.037	<0.039		<0.040		
4,6-Dinitro-2-methylphenol	534-52-1	NE	<0.200	< 0.190	<0.200		<0.200		
2,4-Dinitrophenol	51-28-5	41	<0.200	< 0.190	<0.200		<0.200		
2,4-Dinitrotoluene	121-14-2	840	<0.039	< 0.037	<0.039		<0.040		
2,6-Dinitrotoluene	606-20-2	10,000	<0.039	< 0.037	<0.039		<0.040		
Fluoranthene	206-44-0	3,200	0.00095	0.0014	0.016	J	0.0012	J	
Fluorene	86-73-7	3,800	0.0015	<0.0075	0.0015	J	<0.0081		
Hexachlorobenzene	118-74-1	5.8	<0.008	< 0.037	<0.008		<0.0081		
Hexachlorobutadiene	87-68-3	1,200	<0.008	< 0.0075	<0.008		<0.0081		
Hexachloroethane	67-72-1	56	<0.039	< 0.037	<0.039		<0.040		
Indeno(1,2,3-cd)pyrene	193-39-5	190,000	<0.008	< 0.0075	0.012		<0.0081		
Isophorone	78-59-1	10,000	<0.039	< 0.037	<0.039		<0.040		
2-Methylnaphthalene	91-57-6	8,000	0.0015	<0.0075	0.0011	J	0.0015	J	

Table 3-5
Summary of Soil Sample Analytical Results in Area 5
North Penn Memorial USARC (PA 136)
Norrilstown, Montgomery County, Pennsylvania
Bhate Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mg/kg)	BH-20-0405		BH-21-0405		BH-22-0405		BH-23-0405	
			C0G240465-013		C0G240465-002		C0G240465-004		C0G240465-014	
			7/22/2010		7/22/2010		7/22/2010		7/22/2010	
			4 to 5 ft bgs		4 to 5 ft bgs		4 to 5 ft bgs		4 to 5 ft bgs	
SVOCs Analyzed by EPA Method 8270C (mg/kg)			Result	Q	Result	Q	Result	Q	Result	Q
2-Methylphenol	95-48-7	10,000	<0.039		<0.037		<0.039		<0.040	
4-Methylphenol	106-44-5	51,000	<0.039		<0.037		0.0058	J	<0.040	
Naphthalene	91-20-3	7,500	0.0023	J	<0.0075		0.0014	J	0.0022	J
2-Nitroaniline	88-74-4	0.58	<0.200		<0.190		<0.200		<0.200	
3-Nitroaniline	99-09-2	0.58	<0.200		<0.190		<0.200		<0.200	
4-Nitroaniline	100-01-6	0.58	<0.200		<0.190		<0.200		<0.200	
Nitrobenzene	98-95-3	5,100	<0.079		<0.075		<0.080		<0.080	
2-Nitrophenol	88-75-5	82,000	<0.039		<0.037		<0.039		<0.040	
4-Nitrophenol	100-02-7	6,000	<0.200		<0.190		<0.200		<0.200	
N-Nitrosodiphenylamine	86-30-6	5,500	<0.039		<0.037		<0.039		<0.040	
N-Nitrosodi-n-propylamine	621-64-7	37	<0.008		<0.0075		<0.008		<0.0081	
2,2'-oxybis(1-Chloropropane)	106-60-1	NE	<0.008		<0.0075		<0.008		<0.0081	
Pentachlorophenol	87-86-5	5,000	<0.039		<0.037		<0.039		<0.040	
Phenanthrene	85-01-8	10,000	0.0061	J	0.0047	J	0.012		0.0052	J
Phenol	108-95-2	40,000	0.0052	J	<0.0075		<0.008		<0.0081	
Pyrene	129-00-0	2,200	<0.008		0.00099	J	0.014		0.00096	J
2,4,5-Trichlorophenol	95-95-4	190,000	<0.039		<0.037		<0.039		<0.040	
2,4,6-Trichlorophenol	88-06-2	8,900	<0.039		<0.037		<0.039		<0.040	
VOCs Analyzed by EPA Method 8260B (mg/kg)										
Acetone	67-64-1	10,000	< 0.024		< 0.023		< 0.023		< 0.023	
Benzene	71-43-2	50	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Bromodichloromethane	75-27-4	10	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Bromoform	75-25-2	1,000	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Bromomethane	74-83-9	100	< 0.006		< 0.0058		< 0.0057		< 0.0058	
2-Butanone	78-93-3	10,000	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Carbon disulfide	75-15-0	410	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Carbon tetrachloride	56-23-5	5	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Chlorobenzene	108-90-7	1,000	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Dibromochloromethane	124-48-1	70	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Chloroethane	75-00-3	9,000	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Chloroform	67-66-3	19	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Chloromethane	74-87-3	30	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Cyclohexane	110-82-7	NE	< 0.006		< 0.0058		< 0.0057		< 0.0058	
1,2-Dibromo-3-chloropropane	96-12-8	2	< 0.006		< 0.0058		< 0.0057		< 0.0058	
1,2-Dibromoethane	106-93-4	0.5	< 0.006		< 0.0058		< 0.0057		< 0.0058	
1,2-Dichlorobenzene	95-50-1	6,000	< 0.006		< 0.0058		< 0.0057		< 0.0058	
1,4-Dichlorobenzene	541-73-1	6,100	< 0.006		< 0.0058		< 0.0057		< 0.0058	
Dichlorodifluoromethane	75-71-8	10,000	< 0.006		< 0.0058		< 0.0057		< 0.0058	

Table 3-5
Summary of Soil Sample Analytical Results in Area 5
 North Penn Memorial USARC (PA 136)
 Norristown, Montgomery County, Pennsylvania
 Bhat Project No. 9100070

Sample Identification: Laboratory Identification: Sample Date: Soil Sample Interval:	CAS Number	PADEP Act 2 MSC ¹ (mg/kg)	BH-20-0405	BH-21-0405	BH-22-0405	BH-23-0405			
			C0G240465-013	C0G240465-002	C0G240465-004	C0G240465-014			
			7/22/2010	7/22/2010	7/22/2010	7/22/2010			
			4 to 5 ft bgs						
VOCs Analyzed by EPA Method 8260B (mg/kg)			Result	Q	Result	Q	Result	Q	
1,1-Dichloroethane	75-34-3	110	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,2-Dichloroethane	107-06-2	5	< 0.006		< 0.0058		< 0.0057		< 0.0058
cis-1,2-Dichloroethene	156-59-2	70	< 0.006		< 0.0058		< 0.0057		< 0.0058
trans-1,2-Dichloroethene	156-60-5	100	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,1-Dichloroethene	75-35-4	7	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,2-Dichloropropane	78-87-5	5	< 0.006		< 0.0058		< 0.0057		< 0.0058
cis-1,3-Dichloropropene	10061-01-5	NE	< 0.006		< 0.0058		< 0.0057		< 0.0058
trans-1,3-Dichloropropene	10061-02-6	NE	< 0.006		< 0.0058		< 0.0057		< 0.0058
Ethylbenzene	100-41-4	7,000	< 0.006		< 0.0058		< 0.0057		< 0.0058
2-Hexanone	591-78-6	NE	< 0.006		< 0.0058		< 0.0057		< 0.0058
Isopropylbenzene (Cumene)	98-82-8	10,000	< 0.006		< 0.0058		< 0.0057		< 0.0058
Methyl acetate	79-20-9	10,000	< 0.006		< 0.0058		< 0.0057		< 0.0058
Methylcyclohexane	108-87-2	NE	< 0.006		< 0.0058		< 0.0057		< 0.0058
Methylene chloride	75-09-2	50	< 0.006		< 0.0058		< 0.0057		< 0.0058
4-Methyl-2-pentanone	108-10-1	4,100	< 0.006		< 0.0058		< 0.0057		< 0.0058
Methyl tert-butyl ether	1634-04-4	20	< 0.006		< 0.0058		< 0.0057		< 0.0058
Styrene	100-42-5	2,400	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,1,2,2-Tetrachloroethane	79-34-5	3	< 0.006		< 0.0058		< 0.0057		< 0.0058
Tetrachloroethene	127-18-4	5	< 0.006		< 0.0058		< 0.0057		< 0.0058
Toluene	108-88-3	10,000	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,2,4-Trichlorobenzene	120-82-1	10,000	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,1,1-Trichloroethane	71-55-6	200	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,1,2-Trichloroethane	79-00-5	5	< 0.006		< 0.0058		< 0.0057		< 0.0058
Trichloroethene	79-01-6	5	< 0.006		< 0.0058		< 0.0057		< 0.0058
Trichlorofluoromethane	75-69-4	10,000	< 0.006		< 0.0058		< 0.0057		< 0.0058
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	53,000	< 0.006		< 0.0058		< 0.0057		< 0.0058
Vinyl chloride	75-01-4	2	< 0.006		< 0.0058		< 0.0057		< 0.0058
Xylenes (total)	1330-20-7	10,000	< 0.018		< 0.017		< 0.017		< 0.018
Total Petroleum Hydrocarbon Analyzed by EPA Method 9071B (mg/kg)									
Total Petroleum Hydrocarbon		NE	<0.198		<0.189		<0.201		<0.201

Notes:

CAS - Chemical Abstracts Service

PADEP - Pennsylvania Department of Environmental Protection

MSC - Medium Specific Concentration

¹ PADEP MSCs for generic soil to non-use aquifer were generated in accordance with Section II.B.3.b. of the *Pennsylvania's Land Recycling Program Technical Guidance Manual* (PADEP, 2008).

VOC - Volatile Organic Compounds

EPA - Environmental Protection Agency

All constituent concentrations are reported in milligrams per kilogram (mg/kg)

Q - Laboratory Qualifier

SVOC - Semi-volatile Organic Compounds

NE - not established

Bold - indicates a detected concentration

J - the reported value is less than the reporting limit but greater than the method detection limit