
FINAL

**ENVIRONMENTAL ASSESSMENT
FOR BRAC 05 RECOMMENDATIONS FOR CLOSURE,
DISPOSAL, AND REUSE OF THE SFC NELSON V. BRITTIN
UNITED STATES ARMY RESERVE CENTER,
PENNSAUKEN TOWNSHIP, CAMDEN COUNTY, NEW JERSEY**



**Prepared for:
US Army Reserve 99th Regional Support Command**

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October 2011



DRAFT FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT FOR
CLOSURE, DISPOSAL, AND REUSE OF THE
SFC NELSON V. BRITTIN US ARMY RESERVE CENTER,
PENNSAUKEN TOWNSHIP, CAMDEN COUNTY, NEW JERSEY

Pursuant to the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and 32 CFR 651 (Environmental Analysis of Army Actions), as well as policy and guidance provided by the *Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act*, the US Army Corps of Engineers, Mobile District has prepared an Environmental Assessment (EA) on behalf of the US Army Reserve 99th Regional Support Command of the potential environmental and socioeconomic effects associated with the closure, disposal, and reuse of the SFC Nelson V. Brittin United States Army Reserve Center (USARC), Pennsauken Township, Camden County, New Jersey.

PURPOSE AND NEED

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission made the following recommendations concerning the Brittin USARC, Pennsauken Township, Camden County, New Jersey:

Close the Nelson Brittin Army Reserve Center in Camden, NJ and relocate units to a new consolidated Armed Forces Reserve Center in Camden, NJ, if the Army can acquire suitable land for the construction of the new facilities. The new AFRC shall have the capability to accommodate units from the New Jersey ARNG Armory, Burlington, if the state decides to relocate those units.

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.

PROPOSED ACTION

The proposed action is the closure, disposal, and reuse of the Brittin USARC (the Property). Reuse of the surplus property made available by the closure of the Brittin USARC would occur as a secondary action resulting from disposal. Environmental effects associated with the transfer of personnel to the new Armed Force Reserve Center (AFRC) and actions related to this transfer have been evaluated under NEPA in a separate EA (USACE 2010).

The Brittin USARC, located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey, was built in 1953. This site consists of 7.7 acres of developed land with the following structures: a 25,100-square-foot main administration building

built in 1953, a 7,600-square-foot organizational maintenance shop (OMS) building built in 1953, a 360-square-foot petroleum, oil, and lubricant (POL) storage shed built in 1990, and a hazardous materials storage shed.

ALTERNATIVES CONSIDERED

Alternative 1, No Action Alternative

The No Action Alternative is included as required by the Council on Environmental Quality regulations. The No Action Alternative would continue the mission at the Brittin USARC as it was in December 2010. Because the BRAC law mandates closure and realignment of installations, this alternative would not be feasible. Nevertheless, it serves as a baseline alternative against which to compare the other alternatives.

Alternative 2, Caretaker Status

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

Alternative 3, Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Under Alternative 3, the Army would transfer the Brittin USARC to the Pennsauken Township Public Works Department and Office of Emergency Management (OEM) (approximately 5 acres) and the Volunteers of America (VOA) (approximately 2 acres). Pennsauken Township plans to use the administration building for Public Works and OEM staff. The OMS building would be renovated to accommodate OEM vehicles and a salt silo would be constructed on the site. The VOA plans to construct at least 12 permanent housing units for the homeless at the site along with a support center and open space.

FACTORS CONSIDERED IN DETERMINING THAT NO ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED

The EA analyzed 12 resource areas for each alternative: land use, aesthetics and visual resources, cultural resources, air quality, noise, geology and soil, water resources, biological resources, socioeconomics, transportation, utilities, and hazardous and toxic substances. The analyses in the EA concluded that there will be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or alternatives. Consequently, no mitigation measures are required as part of this EA to reduce impacts to non-significant levels.

CONCLUSION

Based on the EA, it has been determined that implementation of any of the alternatives will not result in a significant impact on the quality of the human or natural environment. The Army is committed to implementing the Best Management Practices described in the EA. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted, and an Environmental Impact Statement is not required and will not be prepared.

Alternative 3 is the preferred alternative of the Army, and will be the selected alternative as it satisfies the proposed action. This alternative would also allow future development in support of the need of Pennsauken Township and the VOA.

PUBLIC AVAILABILITY

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

The 30-day public review period was initiated by placing a Notice of Availability of the final EA and a draft FNSI in the *Courier-Post* and *The Philadelphia Inquirer*. The EA and draft FNSI were available at the Camden Free Public Library, 418 Federal Street, Camden, New Jersey 08103; the Camden Free Public Library - Ferry Avenue Branch, 852 Ferry Avenue, Camden, New Jersey 08104; the Camden County Library – Haddon Township Branch, 15 MacArthur Blvd., Westmont, New Jersey 08108; the Pennsauken Free Public Library, 5605 Crescent Blvd., Pennsauken, New Jersey 08110; and on the Army's BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

Date

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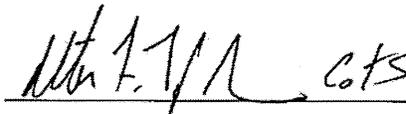
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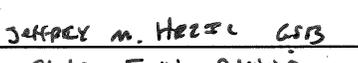
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SECTION	TABLE OF CONTENTS	PAGE
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EXECUTIVE SUMMARY.....		ES-1
SECTION 1.0 INTRODUCTION.....		1
1.1 Purpose and Need		1
1.2 Public Involvement		8
SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION.....		9
2.1 Army Disposal and Reuse.....		10
2.2 Local Redevelopment Authority’s Reuse Plan		10
SECTION 3.0 ALTERNATIVES		13
3.1 ALTERNATIVE 1 – No Action Alternative		13
3.2 ALTERNATIVE 2 – Caretaker Status Alternative		13
3.3 ALTERNATIVE 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units		14
3.4 Alternatives Considered and Eliminated From Further Analysis		18
3.4.1 Early Transfer and Reuse		18
3.4.2 Other Reuse Alternatives.....		18
SECTION 4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES.....		19
4.1 Introduction		19
4.1.1 Definition of Key Terms.....		19
4.1.1.1 Environmental Baseline		19
4.1.1.2 Impact.....		19
4.1.1.3 Direct Versus Indirect Impacts		19
4.1.1.4 Long-Term versus Short-Term Impacts		20
4.1.1.5 Significance		20
4.2 Land Use.....		20
4.2.1 Affected Environment.....		20
4.2.1.1 Regional Geographic Setting and Location.....		20
4.2.1.2 Installation Land.....		21
4.2.1.3 Surrounding Land		21
4.2.1.4 Current and Future Development in the Region of Influence		21
4.2.2 Consequences.....		22
4.2.2.1 Alternative 1 – No Action Alternative		22
4.2.2.2 Alternative 2 – Caretaker Status Alternative		22
4.2.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....		22
4.3 Aesthetics and Visual Resources.....		22
4.3.1 Affected Environment.....		22
4.3.2 Consequences.....		23
4.3.2.1 Alternative 1 – No Action Alternative		23
4.3.2.2 Alternative 2 – Caretaker Status Alternative		23

4.3.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	23
4.4	Cultural Resources.....	23
4.4.1	Affected Environment.....	24
4.4.1.1	Prehistoric and Historic Background (Cultural Contexts)	25
4.4.1.2	Status of Cultural Resources Inventories and Section 106 Consultations	25
4.4.1.3	Native American Resources	28
4.4.2	Consequences.....	28
4.4.2.1	Alternative 1 – No Action Alternative	28
4.4.2.2	Alternative 2 – Caretaker Status Alternative	29
4.4.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	29
4.5	Air Quality.....	29
4.5.1	Affected Environment.....	29
4.5.1.1	Ambient Air Quality Conditions	29
4.5.1.2	Air Pollutant Emissions at Installation	30
4.5.1.3	Regional Air Pollutant Emissions Summary.....	30
4.5.2	Consequences.....	30
4.5.2.1	Alternative 1 – No Action Alternative	30
4.5.2.2	Alternative 2 – Caretaker Status Alternative	30
4.5.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	31
4.6	Noise.....	31
4.6.1	Affected Environment.....	31
4.6.2	Consequences.....	32
4.6.2.1	Alternative 1 – No Action Alternative	32
4.6.2.2	Alternative 2 – Caretaker Status Alternative	32
4.6.2.3	Alternative 3 - Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	33
4.7	Geology and Soil.....	33
4.7.1	Affected Environment.....	33
4.7.1.1	Geologic Conditions.....	33
4.7.1.2	Soil.....	33
4.7.2	Consequences.....	34
4.7.2.1	Alternative 1 – No Action Alternative	34
4.7.2.2	Alternative 2 – Caretaker Status Alternative	34
4.7.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	34

	Management and to Volunteers of America for Construction of Housing Units.....	34
4.8	Water Resources	35
4.8.1	Affected Environment.....	35
4.8.1.1	Surface Water.....	35
4.8.1.2	Hydrology/Groundwater	36
4.8.1.3	Floodplains	36
4.8.1.4	Coastal Zone	36
4.8.2	Consequences.....	37
4.8.2.1	Alternative 1 – No Action Alternative	37
4.8.2.2	Alternative 2 – Caretaker Status Alternative	37
4.8.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	37
4.9	Biological Resources.....	38
4.9.1	Affected Environment.....	38
4.9.1.1	Vegetation.....	38
4.9.1.2	Wildlife	38
4.9.1.3	Sensitive Species	38
4.9.1.4	Wetlands.....	38
4.9.2	Consequences.....	38
4.9.2.1	Alternative 1 – No Action Alternative	38
4.9.2.2	Alternative 2 – Caretaker Status Alternative	39
4.9.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	39
4.10	Socioeconomics	39
4.10.1	Affected Environment.....	40
4.10.1.1	Economic Development.....	40
4.10.1.2	Demographics.....	42
4.10.1.3	Housing.....	42
4.10.1.4	Quality of Life.....	43
4.10.1.5	Environmental Justice.....	44
4.10.1.6	Protection of Children	45
4.10.2	Consequences.....	46
4.10.2.1	Alternative 1 – No Action Alternative	46
4.10.2.2	Alternative 2 – Caretaker Status Alternative	46
4.10.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	47
4.11	Transportation	49
4.11.1	Affected Environment.....	49
4.11.1.1	Roadways and Traffic	49

4.11.1.2	Installation Transportation.....	49
4.11.1.3	Public Transportation	49
4.11.2	Consequences.....	49
4.11.2.1	Alternative 1 – No Action Alternative	49
4.11.2.2	Alternative 2 – Caretaker Status Alternative	49
4.11.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	50
4.12	Utilities.....	50
4.12.1	Affected Environment.....	50
4.12.1.1	Potable Water Supply	50
4.12.1.2	Wastewater System.....	51
4.12.1.3	Storm Water System.....	51
4.12.1.4	Energy Sources	51
4.12.1.5	Communications	51
4.12.1.6	Solid Waste.....	51
4.12.2	Consequences.....	51
4.12.2.1	Alternative 1 – No Action Alternative	51
4.12.2.2	Alternative 2 – Caretaker Status Alternative	52
4.12.2.3	Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	52
4.13	Hazardous and Toxic Substances.....	52
4.13.1	Affected Environment.....	52
4.13.1.1	Uses of Hazardous Materials.....	52
4.13.1.2	Storage and Handling Areas.....	53
4.13.1.3	Hazardous Waste Disposal.....	54
4.13.1.4	Site Contamination and Cleanup	54
4.13.1.5	Special Hazards.....	55
4.13.2	Consequences.....	55
4.13.2.1	Alternative 1 – No Action Alternative	55
4.13.2.2	Alternative 2 – Caretaker Status Alternative	55
4.13.2.3	Alternative 3 - Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units.....	55
4.14	Cumulative Effects	56
4.14.1	Introduction	56
4.14.2	Potential Cumulative Impacts	57
4.14.2.1	Alternative 1 – No Action Alternative	57
4.14.2.2	Alternative 2 – Caretaker Status Alternative	57
4.14.2.3	Alternative 3 - Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency	

Management and to Volunteers of America for Construction of Housing Units.....	58
4.15 Best Management Practices	59
SECTION 5.0 FINDINGS AND CONCLUSIONS	61
SECTION 6.0 PREPARERS LIST	63
SECTION 7.0 DISTRIBUTION LIST	65
SECTION 8.0 REFERENCES	67
SECTION 9.0 PERSONS CONSULTED	73
SECTION 10.0 ACRONYMS	75

LIST OF APPENDICES

APPENDIX A – Agency Coordination	
A.1 Initial Coordination Letters	
A.2 HPO – Section 106 Consultation	
A.3 USFWS Consultation	
A.4 Agency and Public Notices	
APPENDIX B – Air Conformity Applicability Analysis	
APPENDIX C – Economic Impact Forecast System Report	
APPENDIX D – Legal and Regulatory Framework for BRAC Closure, Disposal, and Reuse Process	

LIST OF TABLES

Table	Page
Table ES.1 Impact Summary	4
Table 4.1 Annual Civilian Labor Force and Unemployment Rate, Brittin USARC Region and Larger Regions.....	41
Table 4.2 Non-Agricultural Wage and Salary Employment by NAICS Industry for Camden Labor Area (Burlington, Camden, and Gloucester Counties (Not Seasonally Adjusted)	41
Table 4.3 Regional and Local Population Trends, Brittin USARC Region, 1990-2020.	42
Table 4.4 Housing Characteristics, Brittin USARC Region and Larger Regions, 2008	43
Table 4.5 Residential Homes Listed for Sale, Brittin USARC Region of Influence.	43
Table 4.6 Public School District and School information for Camden, NJ Metropolitan Division and State of New Jersey.....	44
Table 4.7 Minority and Low-Income Populations: Brittin USARC Region and Larger Regions, 2009	45
Table 4.8 Estimated Annual Economic Impacts : Alternative 3 – Renovate OMS Building, Construct Salt Silo, and Construct VOA Housing	47
Table 5.1 Impact Summary	62

LIST OF FIGURES

Figure	Page
Figure 1.1 Site Vicinity Map.....	3
Figure 1.2 Brittin USARC Topographic Map.....	5
Figure 1.3 Brittin USARC Site Layout.....	7
Figure 3.1 Conceptual Reuse Plan	17

EXECUTIVE SUMMARY

ES 1 INTRODUCTION

This environmental assessment (EA) analyzes the potential environmental impacts associated with the United States Army's (Army) Proposed Action on the closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC) in Pennsauken Township, Camden County, New Jersey. This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) (42 United States Code [USC] § 4321 et seq.); implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651. The US Army Corps of Engineers, Mobile District has prepared this EA on behalf of the US Army Reserve 99th Regional Support Command (RSC). Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

This EA addresses the potential environmental, cultural, and socioeconomic effects of the Brittin USARC (the Property) closure, disposal, and reuse. The potential effects of the relocation of the units stationed at the Brittin USARC have been addressed in a separate EA.

ES 2 Setting

The Brittin USARC, located at 3911 Federal Street in Pennsauken Township, Camden County, New Jersey, was built in 1953. The USARC is surrounded by commercial businesses and residential buildings. This site consists of 7.7 acres of developed land with the following structures:

- 25,100-square-foot main building (including the drill hall);
- 7,600-square-foot organizational maintenance shop (OMS);
- 360-square-foot petroleum, oil, and lubricant (POL) storage shed; and
- hazardous materials storage shed.

ES 3 PROPOSED ACTION

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission made the following recommendations concerning the Brittin USARC, Pennsauken Township, Camden County, New Jersey:

Close the Nelson Brittin Army Reserve Center in Camden, NJ and relocate units to a new consolidated Armed Forces Reserve Center in Camden, NJ, if the Army can acquire suitable land for the construction of the new facilities. The new AFRC shall have the capability to accommodate units from the New Jersey ARNG Armory, Burlington, if the state decides to relocate those units.

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.

ES 4 PROPOSED ACTION

The proposed action is the closure, disposal, and reuse of the Brittin USARC. Reuse of the surplus property made available by the closure of the Brittin USARC would occur as a secondary action resulting from disposal. Environmental effects associated with the transfer of personnel to the new Armed Forces Reserve Center (AFRC) and actions related to this transfer have been evaluated under NEPA in a separate EA (USACE 2010).

The Brittin USARC, located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey, was built in 1953. This site consists of 7.7 acres of developed land with the following structures: a 25,100-square-foot main administration building built in 1953, a 7,600-square-foot organizational maintenance shop (OMS) building built in 1953, a 360-square-foot petroleum, oil, and lubricant (POL) storage shed built in 1990, and a hazardous materials storage shed.

ES 5 ALTERNATIVES CONSIDERED

ES 5.1 Alternative 1, No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Brittin USARC at levels similar to those that occurred prior to the 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. The Reserve mission at the USARC has ended and it is unlikely that it would ever resume, given the recommendation of the BRAC Commission. Nevertheless, this no action alternative allows comparison of impacts between the prior mission, the current caretaker status, and the proposed reuse. Therefore, the no action alternative is evaluated in the EA.

ES 5.2 Alternative 2, Caretaker Status

The Army secured the Brittin USARC after the military mission ended on September 15, 2011 to ensure public safety and the security of remaining government property and to complete any environmental remediation actions, if required. 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 Brittin USARC is not transferred, the Army will 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).

ES 5.3 Alternative 3, Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

For the Preferred Alternative, the Army would transfer the Brittin USARC to the Pennsauken Township Public Works Department and Office of Emergency

Management (OEM) (approximately 5 acres) and the Volunteers of America (VOA) (approximately 2 acres). Pennsauken Township plans to use the administration building for Public Works and OEM staff. The OMS building would be renovated to accommodate OEM vehicles and a salt silo would be constructed on the site. The VOA plans to construct at least 12 permanent housing units for the homeless at the site along with a support center and open space.

ES 6 ENVIRONMENTAL CONSEQUENCES

The EA analyzed 12 resource areas for each alternative: land use, aesthetics and visual resources, air quality, noise, geology and soil, water resources, biological resources, cultural resources, socioeconomics, transportation, utilities, and hazardous and toxic substances. The analyses in the EA concluded there would be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or alternatives. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted, and preparation of an Environmental Impact Statement (EIS) is not required.

ES 7 BEST MANAGEMENT PRACTICES

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

Since no significant adverse or significant beneficial impacts were identified or are anticipated, no mitigation measures are required as part of this EA to reduce impacts to non-significant levels.

ES 8 CONCLUSIONS

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

As such, any of the alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC law (Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended); consequently, it has not been selected for implementation.

Alternative 3 is the preferred alternative of the Army. This alternative would also allow future development in support of the needs of Pennsauken Township and the VOA.

Table ES.1 Impact Summary							
RESOURCE AREA ¹	NO ACTION	Alternative 2			Alternative 3		
		Direct	Indirect	Cumulative	Direct	Indirect	Cumulative
Land Use					X		
Aesthetic and Visual Resources		O		O	O, X		O, X
Cultural Resources							
Air Quality		X			O		O
Noise					O, X		O
Geology and Soil					O, X	O	
Water Resources					O	O	
Biological Resources		X			O	O	
Socioeconomics			O		X	X	X
Transportation		O, X		O	O		O
Utilities		X					
Hazardous and Toxic Substances		X			O, X		O, X
<p>X No Significant Beneficial Effect ◆ Significant Beneficial Effect</p> <p>O No Significant Adverse Effect ● Significant Adverse Effect</p> <p>¹A blank cell indicates no impact.</p>							

SECTION 1.0 INTRODUCTION

This Environmental Assessment (EA) analyzes the environmental impacts of the proposed closure, disposal, and reuse of the (Name) United States Army Reserve Center (USARC), (City), (State) (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.

This environmental assessment (EA) analyzes the potential environmental impacts associated with the United States (US) Army's (Army) Proposed Action on the disposal and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC) in Pennsauken Township near Camden, New Jersey. Figures 1.1 and 1.2 show the location of the Brittin USARC in Pennsauken Township, New Jersey and Figure 1.3 shows the site layout on an aerial photograph. This EA was developed in accordance with the *National Environmental Policy Act of 1969* (NEPA) (42 United States Code [USC] § 4321 et seq.); implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651. The US Army Corps of Engineers, Mobile District has prepared this EA on behalf of the US Army Reserve 99th Regional Support Command (RSC). The purpose of the EA is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

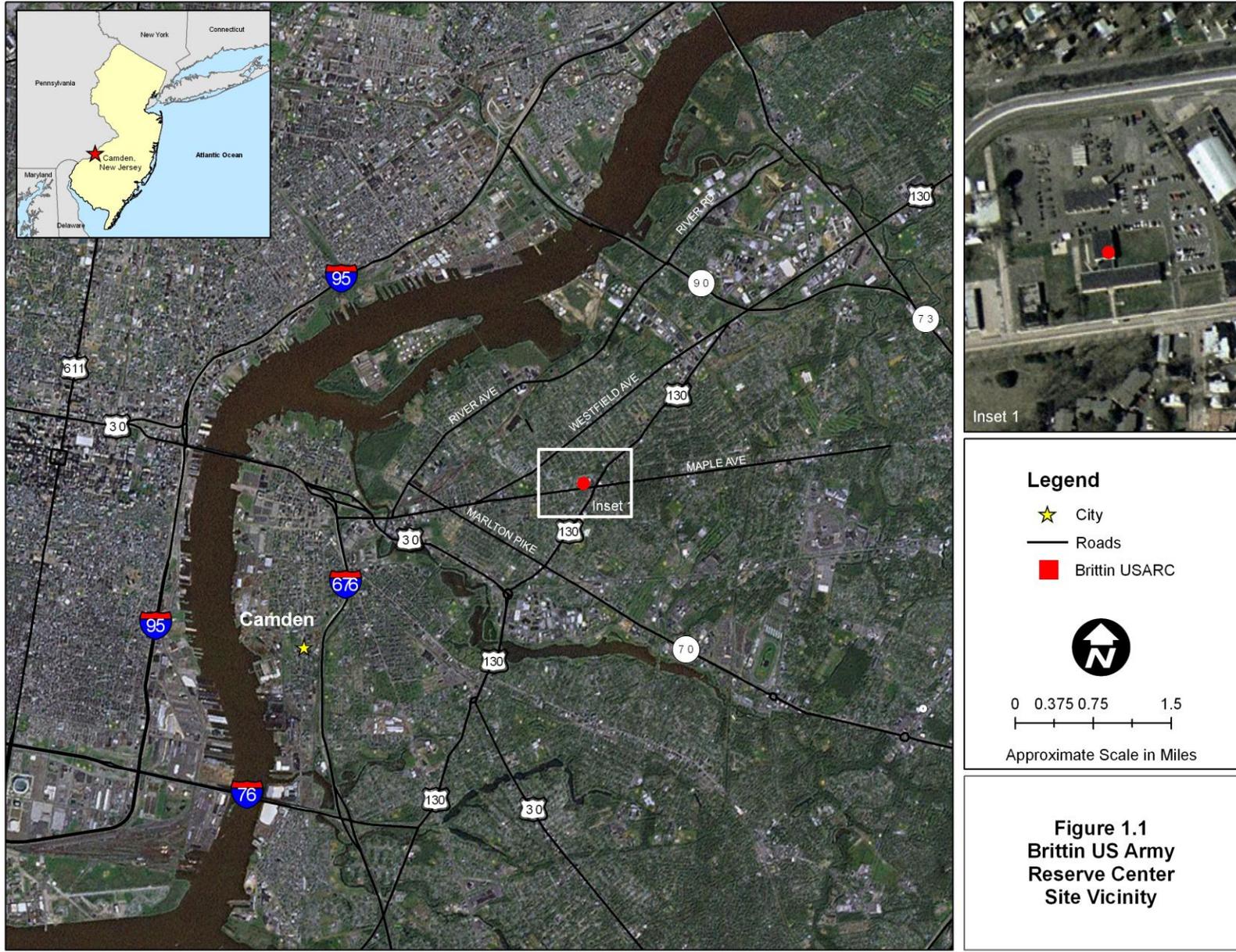
1.1 Purpose and Need

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Close the Nelson Brittin Army Reserve Center in Camden, NJ and relocate units to a new consolidated Armed Forces Reserve Center in Camden, NJ, if the Army can acquire suitable land for the construction of the new facilities. The new AFRC shall have the capability to accommodate units from the New Jersey ARNG Armory, Burlington, if the state decides to relocate those units.

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.

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Inset 1

Legend

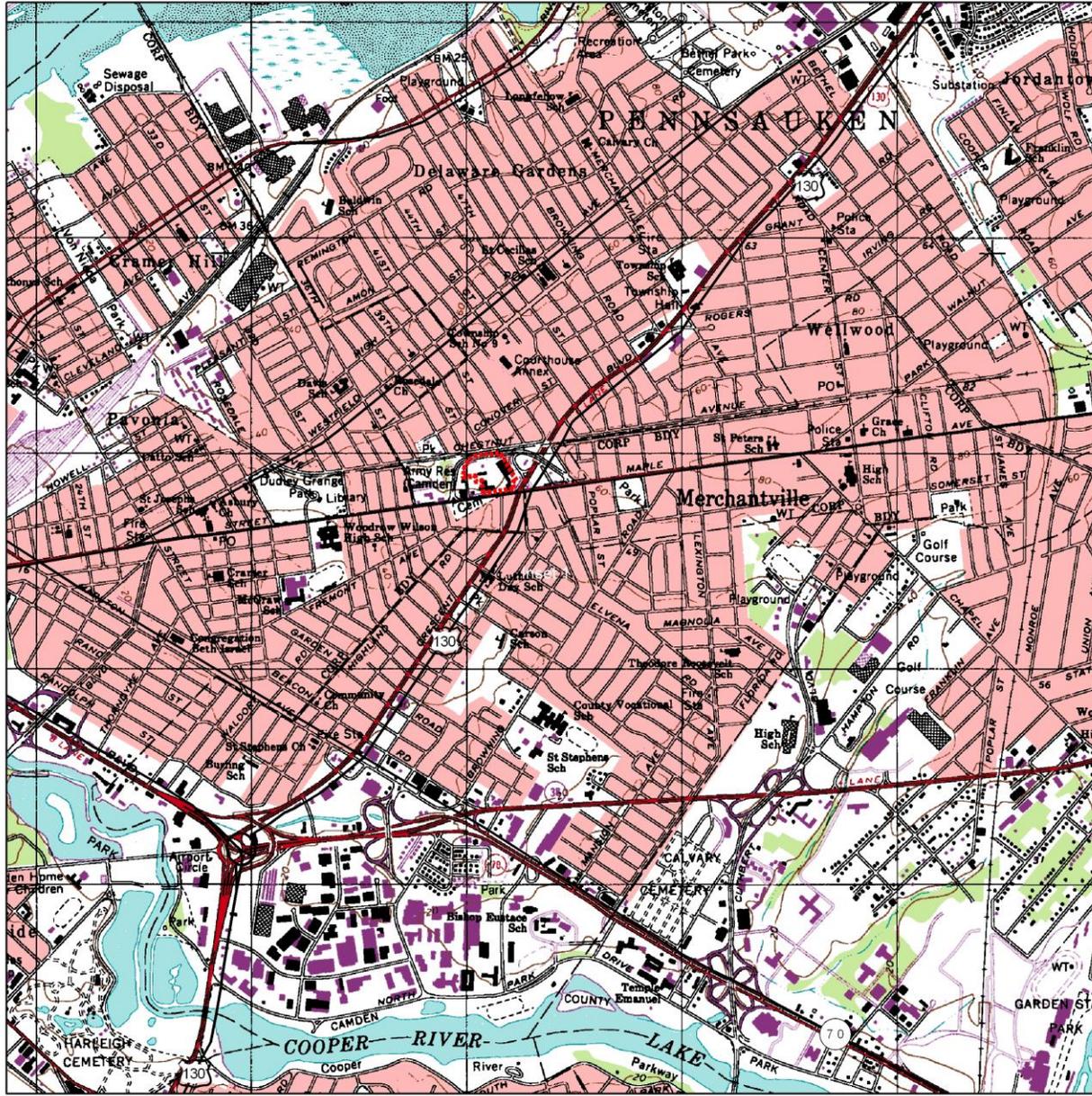
- ★ City
- Roads
- Brittin USARC



0 0.375 0.75 1.5
 Approximate Scale in Miles

**Figure 1.1
 Brittin US Army
 Reserve Center
 Site Vicinity**

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Legend

 Installation Boundary



0 1,125 2,250


Approximate Scale in Feet

Topographic Map:
 1:24,000 - Camden Quadrangle
 USGS Scan of 1967 Map
 * Revisions shown in purple are
 USGS edits completed in 1994.

**Figure 1.2
 Brittin US Army
 Reserve Center
 Project Area**

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Legend

- Administrative Building
- OMS Building
- Hazardous Storage Shed
- POL Storage Shed
- Vehicle Wash Area
- F.A.A. Easement
- Installation Boundary



0 0.02 0.04

Approximate Scale in Miles

**Figure 1.3
Brittin US Army
Reserve Center**

1.2 Public Involvement

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

The Army will begin a 30-day public review period by placing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in a regional newspaper, the *Courier-Post*, and a major newspaper, *The Philadelphia Inquirer*. The EA and draft FNSI will be available for review at the Camden Free Public Library, 418 Federal Street, Camden, New Jersey 08103; the Camden Free Public Library - Ferry Avenue Branch, 852 Ferry Avenue, Camden, New Jersey 08104; the Camden County Library – Haddon Township Branch, 15 MacArthur Blvd., Westmont, New Jersey 08108; the Pennsauken Free Public Library, 5605 Crescent Blvd., Pennsauken, New Jersey 08110, and on the Army's BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. The Army invites the public and all interested and affected parties to review and comment on the draft FNSI. Comments and requests for information should be submitted to the NEPA Coordinator of the 99th Regional Support Command (RSC), Amanda Murphy (Department of Public Works) at 5231 South Scott Plaza, Fort Dix, New Jersey, 08640 or amanda.w.murphy@us.army.mil.

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

SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION

The proposed action is the closure, disposal and reuse of the Brittin USARC (the Property). Reuse of the surplus property made available by the closure of the Brittin USARC would occur as a secondary action resulting from disposal. Environmental effects associated with the transfer of personnel to the new Armed Forces Reserve Center (AFRC) and actions related to this transfer have been evaluated under NEPA in a separate EA (USACE 2010).

The Brittin USARC is located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey (Figure 1.3). The primary mission of the USARC is to provide organizational and limited direct support maintenance and technical assistance to support USAR units located in the region. This location has been owned by the US Government since December 8, 1952. It consists of 7.7 acres of developed land with the following structures:

- 25,100-square-foot main building (including the drill hall);
- 7,600-square-foot organizational maintenance shop (OMS);
- 360-square-foot petroleum, oil, and lubricant (POL) storage shed;
- hazardous materials storage shed; and
- vehicle wash area (currently unused).

The main building and OMS building were constructed in 1953 and are on concrete foundations with concrete block walls and foam/stucco-type exteriors. The main building contains office space, classrooms, a kitchen area, storage rooms, a former indoor firing range, a boiler room, an arms vault, and a drill hall. The main building is a T-shaped multiple-level structure, with a two-story drill hall connected by an one-story enclosed corridor (US Army Corps of Engineers [USACE] 2007).

The OMS is a single story building with four vehicle service bays. The OMS building was used for limited maintenance of military vehicles and consists of an active lube pit, caged storage, a boiler room, and several offices.

The POL storage shed was constructed in 1990 and is located at the northwestern end of the Property. This single story storage shed was used for storage of fog oil and fuel cans. It is constructed of metal siding with a concrete floor. The hazardous materials storage shed is a single floored, relocatable shed located southwest of the OMS building. An inventory was not available at the time of the site reconnaissance; however the shed was noted to contain gear oil, engine oil, paint, cement, cleaning compound, five gallon jugs of diesel fuel, and unmarked POL product.

The vehicle wash rack is located southwest of the OMS building. The wash rack is constructed of concrete and drains through two outlets into an oil/water separator.

A military equipment parking (MEP) area is located northeast of the OMS building and a privately owned vehicle (POV) parking area is located east of the main building. Approximately three-fourths of the Property is covered by impervious surface features

such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is landscaped with grass, shrubs, and trees toward the front of the Property along Federal Street. The site is surrounded by a chain link security fence topped with barbed wire.

The Brittin USARC was most recently occupied by the 417th Training Battalion, 357th Chemical Company, 716th Quartermaster Platoon, and the 1-114th Infantry Company New Jersey Army National Guard.

BRAC legislation and process allow the Army to dispose of property no longer required to support Army missions. The Army proposes to dispose of the Brittin USARC as a single parcel as a public benefit conveyance. The local community has formed a Local Redevelopment Authority (LRA) and developed a plan for reuse of the Property. The LRA's recommended reuse is discussed in Section 3.3.

2.1 Army Disposal and Reuse

The proposed action is the disposal of surplus property made available by the realignment of the Brittin USARC. Redevelopment and reuse of the surplus USARC Property would occur as a secondary action under disposal.

Under the BRAC law, the Army was required to close the Brittin USARC not later than September 15, 2011. The Brittin USARC was closed on September 15, 2011 and the Army will dispose of the Property (USAR 2011). Units that most recently occupied the Brittin USARC were relocated to a new consolidated Armed Forces Reserve Center (USACE 2010). As a part of the disposal process, the Army screened the Property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this Property for another purpose.

2.2 Local Redevelopment Authority's Reuse Plan

The USAR proposes to dispose of approximately 5 acres of the Brittin USARC to the Township of Pennsauken Office of Emergency Management (OEM) and the Public Works Department for administrative, storage, and maintenance use, and for location of a new salt storage bin. Approximately 2 acres of the Property will be transferred to the Volunteers of America Delaware Valley, Inc. (VOA). The VOA intends to construct permanent housing for the homeless to best maximize the Property while conforming to local regulations.

On April 12, 2006 the Mayor and Township Committee of Pennsauken Township, New Jersey established the LRA for the purposes of developing a reuse plan for the Brittin USARC under BRAC. As part of the public outreach associated with the development of a reuse plan, the LRA held a workshop on July 26, 2006 to provide the public with the opportunity to become familiar with the Property and to receive answers to questions. The LRA created an informational handout booklet that was available for public distribution.

On July 17, 2007, a public hearing on the original LRA Application was held at Township offices. A draft Supplement to the LRA Application, along with the original Application, was made available for public review and comment on February 27, 2009. Copies of the draft Supplement and the original Application were made available at

Township offices and at the Public Library. Notice of the availability of the draft Supplement and the original Application were made available on February 27, 2009 in the Clerk's office in the township municipal building, and the Public Library and posted on the township website. Adjustments were made to the draft Supplement based on comments received from the public.

A formal public hearing was held on the draft Supplement and the original Application on March 23, 2009, at the Pennsauken Township public meeting hall.

The Final Brittin USARC LRA Reuse Plan was completed and approved by the Pennsauken Township Committee on March 30, 2009. The US Department of Housing and Urban Development (HUD) approved the reuse plan on June 2, 2009. The reuse plan established a vision for redevelopment, designated a land use preference, and described the potential land use transfer mechanisms available. Following a review of the Property reuse options available to them, the LRA, along with the Pennsauken Township Committee, voted to recommend the relocation of the Pennsauken Township OEM and Public Works Departments and for permanent housing for the homeless as the reuse plan for the Brittin USARC (Pennsauken Township LRA 2009).

The LRA addressed the needs of Pennsauken Township for modern and up-to-date facilities to house its emergency management and first responder capabilities and the needs of the homeless in Pennsauken Township. Currently, facilities for housing the Township's emergency services providers are seriously outdated. The approximately 5-acre portion of the Brittin USARC site, as shown on the Redevelopment Plan, will meet the Township's needs for the establishment of a new and consolidated emergency management center (Pennsauken Township LRA 2009).

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SECTION 3.0 ALTERNATIVES

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

The Army has established a process for performing NEPA analysis and documentation of potential impacts associated with Army property disposal and reuse. The process is designed to comply with NEPA and related laws, protect, and enhance the affected environments, and respond to local communities' needs and wishes in keeping with Army objectives for assisting in rapid economic revitalization. The Army's approach is to identify the primary and secondary actions associated with BRAC. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the Property after ownership is transferred.

3.1 ALTERNATIVE 1 – No Action Alternative

Under the No Action Alternative, the Army would continue operations at the Brittin USARC at levels similar to those that occurred prior to the 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. The Reserve mission at the USARC has ended and it is unlikely that it would ever resume, given the recommendation of the BRAC Commission. Nevertheless, this no action alternative allows comparison of impacts between the prior mission, the current caretaker status, and the proposed reuse. Therefore, the no action alternative is evaluated in the EA.

3.2 ALTERNATIVE 2 – Caretaker Status Alternative

The Army secured the Brittin USARC after the military mission ended on September 15, 2011 to ensure public safety and the security of remaining government property and to complete any environmental remediation actions, if required. 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 Brittin USARC is not transferred, the Army will 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 ALTERNATIVE 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

The HUD approved final reuse plan consists of transferring Brittin USARC buildings (two permanent buildings) and Property to the following via a no-cost Public Benefit Conveyance (Figure 3.1):

- Transfer of approximately 5 acres to the Pennsauken Township OEM and Public Works Department, and
- Transfer of approximately 2 acres to the VOA for housing for homeless residents.

Pennsauken Township OEM and Public Works Department

Upon the transfer of approximately 5 acres to the Pennsauken Township, the city intends to:

- Consolidate Pennsauken's OEM and Public Works Department at the Brittin site.
- Maintain the main building and drill hall for OEM and Public Works staff.
- Maintain Federal Aviation Administration (FAA) easement for Doppler radar facility on western edge of the Brittin parcel.
- Renovate the existing OMS building to enable use of the building by OEM vehicles.
- Utilize the existing vehicle wash area for Public Works and OEM vehicles (the site has water recapture capability).
- Construct a salt silo for use by the Public Works Department for winter road maintenance. It is anticipated that the salt silo dimensions will be approximately 100 feet by 100 feet with the capacity to store up to 200 tons of sand and 100 tons of salt. The city plans to construct the silo on the northeast portion of the Property.
- Add an Above-Ground Storage Tank (AST) for E-85 fuel.
- Repair existing on-site storm water management control.
- Pennsauken Township has estimated that approximately 20 to 30 city staff will be assigned to the new site.

Volunteers of America

The conceptual reuse plan for the VOA portion of the Brittin USARC site is the construction of single-family homes, townhomes or apartments, along with a support center, and open space will that serve as permanent housing for the homeless. The concept for this development includes following traditional street layout model including tree plantings and building setbacks per Township ordinances.

It is anticipated that at least 12 units will be constructed at the site; however, the final number and size of units will conform to the zoning regulations in effect at the time of construction.

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Legend

- F.A.A. Easement
- V.O.A. (Homeless Housing) Parcel
- Pennsauken Township
- Installation Boundary



0 0.02 0.04

Approximate Scale in Miles

**Figure 3.1
Brittin US Army
Reserve Center
Reuse Plan**

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.

The Brittin USARC is classified as an Environmental Condition of Property (ECP) Area Type 3, which is an area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action. Since no remedial action is required, 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 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 Redevelopment and Homeless Assistance Act of 1994.

As documented in the Reuse Plan, the LRA received one notice of interest from the VOA. The original VOA notice of interest proposed transfer of the entire Brittin USARC Property to the VOA for a combination of affordable, market rate, and transitional housing. The LRA informed the VOA that the homeless conveyance option in the BRAC process does not support affordable housing and that housing needed to be explicitly for the homeless. Therefore, the LRA originally declined the VOA's plan because the economic impact of affordable, market rate, and transitional housing on the town did not offset the needs of the OEM and Public Works Department, since these governmental divisions affect the safety and provide much needed service for a population of over 35,000 people. Since this original VOA notice of interest alternative for the entire Brittin USARC Property was not selected by the LRA as its official reuse plan, it was not carried forward for further analysis in this EA.

In addition, the LRA contacted the Wiley Mission, which did not submit a notice of interest for the Property. After consulting with the Wiley Mission, it became apparent that the Wiley Mission required additional space before the 2011 timeframe of the Brittin USARC closing. This Alternative also was not carried forward for further analysis in this EA.

SECTION 4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

4.1 Introduction

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

4.1.1 Definition of Key Terms

4.1.1.1 Environmental Baseline

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

4.1.1.2 Impact

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

4.1.1.3 Direct Versus Indirect Impacts

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

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

Indirect impacts are described for the resource category in which indirect impacts are anticipated to occur. For those resource categories with no anticipated indirect impacts, no further discussion on indirect impacts will be included in the Consequences sections. The resource categories with no anticipated indirect impacts include:

-
- Land Use
 - Aesthetic and Visual Resources
 - Cultural Resources
 - Air Quality
 - Noise
 - Transportation
 - Utilities
 - Hazardous and Toxic Substances

4.1.1.4 Long-Term versus Short-Term Impacts

Impacts to resources may occur in a relatively short period of time or may be permanent. In this EA, the estimated time durations during which impacts may be perceived or measured are described as short-term or long-term.

Short-term impacts are generally realized just after or as a result of implementation of the alternative. Short-term impacts may result from preparation of the site for construction, actual construction, and renovation of existing facilities. Some resources may exhibit short-term impacts as they recover from any disturbances.

Long-term impacts are realized after implementation of the alternative. The longer duration may be resource specific (e.g., soil impacts from increased impervious surfaces) or may be a result of the persistence of the cause of the impact (e.g., increased traffic during weekdays without traffic calming measures).

4.1.1.5 Significance

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

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

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

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

4.2 Land Use

4.2.1 Affected Environment

4.2.1.1 Regional Geographic Setting and Location

The Brittin USARC is located in Camden County, New Jersey, (Figures 1.1 and 1.2), just across the Delaware River from Philadelphia, Pennsylvania. The site is in an urban

setting and consists of MEP and POV parking lots, buildings, and maintained lawns. The site occupies 7.7 acres.

4.2.1.2 Installation Land

The primary mission of the USARC is to provide organizational and limited direct support maintenance and technical assistance to support USAR units located in the region. This location has been owned by the US Government since December 8, 1952 and contains the following permanent structures:

- 25,100-square-foot main building (including the drill hall);
- 7,600-square-foot OMS; and
- 360-square-foot POL storage shed.

The main building is a T-shaped multiple-level structure, with a two-story drill hall connected by a one-story enclosed corridor (USACE 2007).

The OMS is a single story building with four vehicle service bays. The OMS building consists of an active lube pit, caged storage, a boiler room, and several offices.

The POL storage shed is a single story storage shed used for storage of fog oil and fuel cans.

4.2.1.3 Surrounding Land

The Brittin USARC is currently zoned as Commercial 1 by the Pennsauken Township Planning and Zoning Department (Adams 2011), though the federal government is exempt from local zoning. A grocery store, package store, and car wash facility are present along North 41st Street and North Crescent Avenue (Route 130) to the east of the facility. Beyond these commercial companies, to the east, are single family homes. The site is bound to the north by Maple Avenue. Beyond Maple Avenue are single family homes. The Johnson Civil War Cemetery, apartment housing, the Waldorf Tavern, and Lamont Medical Equipment are present south of the site across Federal Street. Just west of the site, between Maple Avenue and the parcel boundary is an automobile repair garage, a laundromat, and one single family home.

4.2.1.4 Current and Future Development in the Region of Influence

The towns of Camden, Pennsauken, and Merchantville have received a Neighborhood Improvement Grant to revitalize primarily residential properties in the West Maple neighborhood adjacent to the Brittin USARC. In addition, the Route 130 Redevelopment Zone has been developed to promote new businesses and underutilized businesses along North Crescent Boulevard (Route 130) in Pennsauken Township. No information about specific actions associated with either of these programs was available during the time this EA was produced.

4.2.2 Consequences

There are no significant direct or indirect impacts on Land Use for any alternative.

4.2.2.1 Alternative 1 – No Action Alternative

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

4.2.2.2 Alternative 2 – Caretaker Status Alternative

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

4.2.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. There would be beneficial direct impacts to land use under this alternative. The reuse of this site would be more beneficial than leaving the Property in caretaker status (i.e., Alternative 2). The proposed action would also result in beneficial use of the land for Pennsauken Township and the homeless population in the local area.

It is likely that the 2 acres used by VOA would change from Commercial District zoning regulation to a Residential District. Residential Districts are located adjacent to the site. Therefore, the proposed developments would be similar to and would have no adverse impact with the adjacent land uses.

4.3 Aesthetics and Visual Resources

4.3.1 Affected Environment

The Brittin USARC site has four structures and a vehicle wash area. All buildings are one story with the exception of the main administration building. The administration building is a T-shaped two-story, concrete block building with foam/stucco-type exterior and rubber coated roofing. The upper floor serves as the main floor of the building and faces Federal Street. The lower floor provides access to the two-story drill hall located in the rear of the building (Parsons 2011).

The OMS building is a four-bay concrete block construction with foam/stucco-type exterior and rubber-coated roofing. The main elevation, with the garage bay doors, faces south to the rear of the main administration building.

The POL storage shed is constructed of beige metal siding and a concrete floor that slopes southward. The shed is located at the northwestern portion of the site. The hazardous materials storage shed is a white, relocatable container express unit located at the southwest of the OMS building. Approximately 75 percent of the site is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is maintained grass (predominantly

surrounding the main administration building). A chain link fence with barbed wire follows the perimeter of the Property, except for the street frontage.

The view from the Brittin USARC is dominated by commercial and residential landscapes. The dominant view to the south is Federal Street with commercial uses fronting on the street and an apartment complex beyond a sparsely wooded area. Commercial areas are located to the east, south, and west of the Brittin USARC. Residential development is located the south and north of the site. The Brittin USARC is surrounded on three sides by US Route 130 and its access roads (Figure 1.3).

4.3.2 Consequences

There are no significant direct or indirect impacts on Aesthetics and Visual Resources for any alternative.

4.3.2.1 Alternative 1 – No Action Alternative

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

4.3.2.2 Alternative 2 – Caretaker Status Alternative

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

4.3.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. During construction of the proposed homeless housing there would be adverse impacts from construction equipment and activities. There would be short-term adverse direct impacts to aesthetic and visual resources under Alternative 3.

There would be long-term beneficial direct impacts to visual and aesthetic resources. The proposed new construction would be within a 2-acre area that now contains chain link fencing, parking, a metal storage shed, and turf grass. The proposed reuse plan includes a permanent homeless housing development, which will be organized and designed to create and sustain an attractive and safe neighborhood. Development will feature pedestrian friendly streetscapes throughout the community. Planning for new development will be guided by the traditional models of street layouts, tree plantings, and building setbacks as set forth by the Township. It will also be designed on a “human scale” with reasonable limitations on size, bulk, site disturbance, and relationships to the public streetscape (Pennsauken Township LRA 2009).

4.4 Cultural Resources

Cultural resources are prehistoric and historic sites, structures, districts, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for traditional, religious, scientific, or any other reason. Cultural resources

are discussed here in terms of archaeological sites, including both prehistoric and historical occupations, architectural resources, and locations of concern to Native American groups, including Traditional Cultural Properties.

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

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

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

Identification of NRHP-eligible resources, including archaeological sites, architectural resources, and Native American resources, was conducted according to requirements of 36 CFR 800 for Section 106 of the NHPA. The Section 106 process was initiated with the New Jersey Historic Preservation Office (HPO) on February 24, 2011 (Appendix A). The Area of Potential Effect (APE) was established in coordination with that office and a determination of eligibility for resources identified in the APE and a determination of effect were submitted to the New Jersey HPO as part of the Section 106 coordination process.

4.4.1 Affected Environment

To identify cultural resources that could be potentially affected by the Proposed Action, the area within which archaeological, architectural, and Native American resources would have the potential to be affected must be determined. As defined by 36 CFR 800.16(d) of Section 106 of the NHPA, the APE represents the "...geographic area or

areas within which an undertaking could cause changes in the character or use of historic properties, if any such exists.” In delineating the APE, factors taken into account include the elements of the Proposed Action, the existence of buildings, vegetation, and terrain with respect to potential visual or audible impacts, and construction activities necessary for the Proposed Action.

The APE for cultural resources for the Proposed Action at the Brittin USARC is the USAR Property, defined as the footprint of the existing 7.7 acre USAR facility, including the four buildings and structures, a vehicle wash pad, and paved and landscaped areas on the parcel (Figure 1.3).

A literature review was conducted to identify previously recorded archaeological, architectural, and Native American resources and assess the probability of undiscovered archaeological sites in the APE.

Archival research was conducted at the Camden County Free Public Library, Camden, New Jersey on December 9, 2010; the Pennsauken New Jersey Free Public Library, Pennsauken, New Jersey, and the Camden County Historical Society, Camden, New Jersey on December 10, 2010. Local and regional histories, newspaper clippings, and historical cartographic sources were consulted for information on the local history of the Brittin USARC area, the impact of the local US Army Reserve and associated units had on the area, and SFC Nelson V. Brittin, a Korean War Medal of Honor winner for whom the center is named.

4.4.1.1 Prehistoric and Historic Background (Cultural Contexts)

Detailed cultural contexts for USAR facilities in New Jersey, including the Brittin USARC were developed during preparation of the USAR Integrated Cultural Resources Management Plan (ICRMP) and the associated, Historic Properties Component, 77th RSC, New Jersey (Crane et al. 2004a, 2004b).

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

4.4.1.2 Status of Cultural Resources Inventories and Section 106 Consultations

The 99th RSC (or its predecessor command, the 77th RSC) completed several cultural resources management documents for the Brittin USARC prior to the architectural resources evaluation conducted as part of the development of this EA. The USAR 77th RSC prepared an ICRMP and associated Historic Property Component in 2004 (Crane et al. 2004a, 2004b). The USAR 99th RSC completed an updated ICRMP 2009-2014 in

September 2009 which included information on previous cultural resources investigations and resources at facilities managed by the 99th RSC (USACE Baltimore 2009).

Section 106 consultation was conducted with the New Jersey HPO as a result of this proposed undertaking.

Archaeological Resources. Previous archaeological investigations at the Brittin USARC consisted of a survey for a utility line project in which no archaeological resources were identified on or adjacent to the Brittin USARC facility and a Phase IA study. Based on the Phase IA study, the USARC facility was considered to have some potential to contain historic archaeological resources and a Phase IB survey was recommended (USACE Baltimore 2009).

Historic cartographic information indicates that this parcel remained relatively undeveloped until the 1950s; two small pre-1906 dwellings were constructed and occupied adjacent to the parcel on the southwest edge and an L-shaped one-story restaurant was established in the southeast corner of the parcel by 1950 (Sanborn Map Company 1906, 1926, and 1950). Prior disturbance from construction of the USARC facility and nearby road improvements have severely impacted the potential for intact prehistoric resources and no areas with prehistoric archaeological resources potential were identified. However, a small portion of the USARC site (approximately 1 acre) was considered to have low to moderate potential to contain historic archaeological resources related to historic agricultural land use and the presence of a nearby historic African-American burial ground. The majority of the Brittin USARC site was considered to have low archeological resource potential.

The parcel was originally owned by the Rich family from 1857 to 1952. As indicated on the Sanborn Fire Insurance maps, only one building was constructed during this occupation (the small restaurant present by 1950); most likely the parcel was used as agricultural fields prior to the establishment of the restaurant. The African- American burial ground, known as the Johnson Cemetery, was established by 1857 on a triangular parcel south of what is now Federal Street. The cemetery was originally delineated by marble gate posts and cast or wrought iron fencing, now no longer extant. The Johnson Cemetery contains approximately 86 graves of both men and women with the earliest interment dated 1860 and the last interment dated 1919. The cemetery boundaries have remained consistent through time and the presence of additional graves outside the triangular parcel is unlikely.

Given the types of prior land use (agricultural fields and small 1950s restaurant), it is unlikely that extensive archaeological deposits would remain. Few archaeological artifacts are likely to be associated with agricultural fields and any scattered artifacts would represent incidental debris lost during plowing. Intact architectural features such as piers or foundations would most likely have been razed prior to the construction of the Brittin USARC (no intact foundations were observed during a field visit in December 2010); scattered architectural debris from the restaurant could occur as a result of demolition activities. Archaeological materials associated with the 1950s restaurant would be minimal as systematic trash collection was in place during this time and commercial debris would have been disposed of offsite.

Based on the types of prior land use, intact or extensive subsurface archaeological deposits are unlikely to occur in the undeveloped portions of the Brittin USARC. Although scattered subsurface artifacts may occur, they would not provide significant information to address local research questions therefore lacking the density and diversity needed to consider any locations eligible for listing in the NRHP.

The 99th RSC submitted a letter to the New Jersey HPO on July 21, 2011 concluding that no further archeological investigation were needed at the Brittin USARC (Appendix A). In a letter dated August 22, 2011, the New Jersey HPO concurred with this conclusion (Appendix A).

Architectural Resources. The USARC compound contains four buildings: the main administration building, consisting of an administrative/classroom block and a drill hall, the OMS, and two metal storage structures. The main administration building and the OMS were constructed in 1953, and the metal sheds appear to have been constructed circa 1990. An architectural survey was conducted on December 9, 2010 (Parsons 2011) and the administration building and OMS were evaluated for NRHP eligibility using guidelines from the 2008 Historic Context (Moore et al. 2008).

The plan or footprint of the 25,100 square foot Brittin USARC is an asymmetrical “T.” The main administration building is concrete masonry unit construction clad in smooth-textured stucco and a secondary coating of textured stucco. The main block is connected by a one-story hyphen, to a rear wing, which is the two-story assembly hall. The main block is used for administrative and classroom space while the rear wing is a drill or assembly hall (Parsons 2011).

The OMS building is a 7,600 square foot one-story building is rectangular in plan. The building was constructed with concrete block and four automobile bays, with metal roll-up doors for vehicular access occur on the south elevation. The OMS serves only the maintenance needs of the on-site reserve/training center (Moore et al. 2008: 189).

Based on the layout, design, and time period of construction, the Brittin USARC is based on standardized plans for U.S. Army Reserve Centers categorized in the 2008 Historic Context Study as the “Sprawling Plan” within the Early Cold War property type (Moore et al. 2008). The Brittin USARC exhibits alterations to several character-defining features: the addition of stucco to the exterior surface, the re-sizing of windows, and the addition of non-architecturally compatible materials to the windows (one-over-one modern anodized aluminum windows with wood frames on the south (primary) elevation (Parsons 2011). Based on the 2008 Historic Context standards for assessing integrity, these alterations represent the loss of character-defining elements required for NRHP eligibility.

Because an OMS is a support structure for the main Army Reserve Center and lacks sufficient historical associations and/or design qualities on its own to meet any of the NRHP Criteria for eligibility, an OMS is not likely to be eligible on its own for inclusion on the NRHP. Because the Brittin USARC main building is not considered eligible for the NRHP, neither is the OMS considered eligible for the NRHP.

The architectural survey report was submitted to the New Jersey HPO for review and concurrence with the Determination of Eligibility on February 24, 2011. The New Jersey HPO concurred with this finding on April 14, 2011.

4.4.1.3 Native American Resources

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

As part of the preparation of the 2004-2009 ICRMP, the 99th RSC identified Native American groups with a potential interest in areas in New Jersey where US Army Reserve facilities are located.

Consultation with Native American groups was initiated for the current proposed project at the Brittin USARC on February 25, 2011 including the Delaware Nation, Delaware Tribe of Indians, and the Stockbridge Munsee Community of Wisconsin.

4.4.2 Consequences

There are no significant direct or indirect impacts on Cultural Resources for any alternative.

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

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

For the purposes of this EA, a significant impact under NEPA is defined as an "unresolvable" adverse effect under Section 106 of the NHPA. "Unresolvable" adverse effects may occur when the terms of mitigation cannot be agreed upon, or if the NHPA Section 106 process is foreclosed due to an inability to reach agreement.

4.4.2.1 Alternative 1 – No Action Alternative

Direct Impacts. Under the No Action Alternative, the USAR would not implement the Proposed Action and would continue the mission at the Brittin USARC as it was being

performed in December 2010. No direct impacts to cultural resources differing from the baseline condition would be expected.

4.4.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts

Direct impacts to archaeological and architectural resources from implementing caretaker status under Alternative 2 are not anticipated because NRHP-eligible archaeological or architectural resources do not occur at the facility. The New Jersey HPO concurred with the finding of ‘No Historic Properties Affected’ on August 22, 2011. This letter completed the Section 106 coordination process.

Direct impacts to Native American resources under Alternative 2 are not anticipated because no Native American resources have been identified at the facility; however, Native American consultation to identify cultural items and sites with religious significance is ongoing.

4.4.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct impacts to archaeological and architectural resources from implementing transfer under Alternative 3 are not anticipated because NRHP-eligible archaeological and architectural resources do not occur at the facility. The New Jersey HPO concurred with the finding of ‘No Historic Properties Affected’ on August 22, 2011. Direct impacts to Native American resources under Alternative 3 are not anticipated. No Native American resources have been identified at the facility.

4.5 Air Quality

4.5.1 Affected Environment

4.5.1.1 Ambient Air Quality Conditions

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

Individual states can adopt the NAAQS or establish state ambient air quality standards, which cannot be less stringent than the NAAQS. The New Jersey Department of Environmental Protection (NJDEP) has adopted the NAAQS.

Both primary and secondary NAAQS are defined. The primary NAAQS are intended to protect public health, while the secondary NAAQS are intended to protect the environment (e.g., crops, wildlife, buildings). Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in ‘attainment’ for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a ‘non-attainment’ area for that pollutant. Non-attainment areas are under strict regulatory restriction in an effort to lower pollutant concentrations

to regulatory standards. Three of the criteria pollutants [ozone, carbon monoxide, and particulate matter equal to or less than 10 microns in size (PM₁₀)], are classified according to severity.

The USEPA requires each state to prepare a State Implementation Plan (SIP) to ensure these goals are met. A SIP is a compilation of goals, strategies, source emission limitations and control requirements, schedules, and enforcement actions that would lead the state to compliance with all NAAQS. The SIP includes a maintenance plan with measures to maintain air quality standards in maintenance areas. These involve NAAQS air pollutants that were previously under a non-attainment designation but are currently within regulatory standards.

4.5.1.2 Air Pollutant Emissions at Installation

The USARC is located within a non-attainment area (Camden County, New Jersey) for 8-Hour Ozone and particulate matter equal to or less than 2.5 microns in size (PM_{2.5}) (annual and 24-hour). Camden County is also under a maintenance plan in place for carbon monoxide emissions (NJDEP 2010). Emission sources at the current site include stationary, mobile, and fugitive categorizations. Potential stationary sources include boilers in the administration and OMS buildings. An existing general permit (Permit ID GEN 010001) for the boilers was renewed through July 9, 2011. This serves as a certificate to operate the equipment in the State of New Jersey.

4.5.1.3 Regional Air Pollutant Emissions Summary

A General Conformity Analysis, in accordance with 40 CFR Part 93 Subpart B, is required prior to this project being initiated. Additionally, calculations from associated activities demonstrate air emission levels well below applicable threshold levels. Appendix B contains the Record of Non-Applicability (RONA) and discusses the general air conformity process.

The proposed action is located in Camden County which is in non-attainment status for 8-Hour Ozone and PM_{2.5} (annual and 24-hour). Camden County, New Jersey is also under a maintenance plan in place for carbon monoxide emissions. As such, ozone precursor pollutants [volatile organic compounds (VOCs) and nitrogen oxides (NOx)], PM_{2.5}, and carbon monoxide would apply for a General Conformity Analysis. Camden County is in attainment for all other NAAQS criteria pollutants.

4.5.2 Consequences

There are no significant direct or indirect impacts on Air Quality for any alternative.

4.5.2.1 Alternative 1 – No Action Alternative

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

4.5.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There would be short term beneficial direct impacts under Alternative 2. Under this alternative, the Army would provide for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of the Property.

Currently, the site has approximately 12 full time staff at the Brittin USARC on a daily basis with an additional 329 soldiers on drill weekends. Following closure, there would be a reduction of mobile emissions from government and privately owned vehicles. The only on-site vehicles would be those there for minimal maintenance activities. During the implementation of the caretaker status, there would be emissions from the vehicles and equipment needed to perform maintenance activities on-site.

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

4.5.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. Short- and long-term, adverse direct impacts would be expected under Alternative 3. The primary emission sources for this project will be those associated with construction activities being the predominant emission-generating activity. Cumulative air emissions were calculated for various types of diesel engine construction vehicles and related equipment. The construction activity associated with this modification will be a short-term increase in air emissions as demonstrated in the calculations shown in Appendix B.

Currently, the USARC has 12 employee vehicles on site on a daily basis and additional vehicles for 329 soldiers on drill weekends one weekend a month. The proposed reuse as the Pennsauken Township OEM and Public Works Department will employ approximately 30 city staff at the site and approximately 30-35 Public Works Department and OEM vehicles would utilize the facility (Caldwell 2011). The VOA reuse of the site as a support center and permanent housing for the homeless would also add more regular vehicle emissions from staff and maintenance crews, approximately 14 POVs per day, visiting the facility. Even with this increased mobile emissions associated with increased vehicle use of the site during the week, the site would still experience a long-term decrease in air emissions as demonstrated in the calculations shown in Appendix B.

4.6 Noise

4.6.1 Affected Environment

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

The Army recognizes three noise impact zones for its installations, the definitions of which are based on A-weighted noise levels (dBA) for transportation and small-arms noise, and C-weighted noise levels (dBC) for blast noise. dBA is used interchangeably

with the term A-weighted day-night level (ADNL) and dBC is used interchangeably with the term C-weighted day-night level (CDNL). These noise zones are as follows:

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

Currently, the major sources of noise at the Brittin USARC are automobiles and trucks. Noise sources attributed to the Property comply with Zone I as listed above and do not have adverse impacts on adjacent residential and commercial areas. Noise in the area surrounding the Brittin USARC is generated by residential and commercial activities. Vehicle noise can be attributed to US 130 (North Crescent Road), a heavily used limited access, four-lane roadway, located just east of the Brittin USARC, Federal Street to the south of the Property, and an exit road for US 130 located north of the Property. The nearest sensitive noise receptors are private residences to the north, west, and south of the Brittin USARC. Numerous residences and small commercial businesses are located in the vicinity of the Brittin USARC.

4.6.2 Consequences

There are no significant direct or indirect impacts on Noise for any alternative.

4.6.2.1 Alternative 1 – No Action Alternative

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

4.6.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Changes in noise levels under this alternative would be expected, if the Army finds it necessary to place the Brittin USARC in caretaker status for an indefinite period. It is likely these caretaker activities would result in noise levels below current baseline levels. These reduced noise levels would occur throughout the period

of caretaker status. Any maintenance activities required under caretaker status would be similar to activities currently taking place at the Brittin USARC.

4.6.2.3 Alternative 3 - Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. Short-term adverse direct impacts would occur at the Brittin USARC due to the change in noise levels associated with the reuse of the Property. Short-term adverse direct impacts would be expected due to construction of a new salt bay and VOA permanent housing at the Brittin USARC Property. Construction noise, including construction vehicle and equipment noise, typically does not contribute substantially to long-term average noise levels but consists of frequent, highly intrusive sounds of 87 to 96 dBA (Suter 2002). To reduce impacts associated with noise levels, construction would be limited to daylight hours (Caldwell 2011 and Deas 2011).

Long term beneficial impacts to noise would be expected under Alternative 3. Future vehicle use would consist primarily of privately owned vehicles and Public Works maintenance trucks. Although the elimination of military equipment would occur under Alternative 3, the addition of Public Works vehicles and privately owned vehicles would likely cause a change in the current noise levels at the Brittin USARC Property. Noise levels from drill weekends would be replaced by privately owned vehicles on the VOA Property and occasional township maintenance vehicles. This is anticipated to be a decrease in weekend noise levels.

4.7 Geology and Soil

4.7.1 Affected Environment

4.7.1.1 Geologic Conditions

Camden County is underlain by unconsolidated sediments of Quaternary, Tertiary, and Cretaceous age, consisting mostly of alternating sands, silts, and clays. The sediments dip gently to the southeast and thicken from 40 feet at the Delaware River to 2,900 feet at the Camden-Atlantic County Line. Below the unconsolidated sediments is the pre-Cretaceous crystalline bedrock (USGS 1976). Camden County is in the Atlantic Coastal Plain physiographic province. The county is characterized as a low-lying, gently rolling plain that ranges in altitude from sea level to about 220 feet above mean sea level (msl) (USGS 1967, Figure 1.2). Both Pennsauken and the Brittin USARC are found on the US Geological Survey (USGS) 7.5-minute Camden quadrangle map. As shown on this map, ground surface elevations at the center of the site average 39 feet above msl. There are no known geologic hazards or unique geologic features at the Brittin USARC Property.

4.7.1.2 Soil

The Natural Resource Conservation Service (NRCS) Web Soil Survey was used to evaluate the type of soil at the site (USDA 2011). Approximately 99 percent of the soil at the Brittin USARC Property is mapped as Freehold-Downer-Urban land complex, with 0 to 5 percent slopes. The remaining soil is mapped as Urban complex. Freehold and

Downer soils are described as fine sandy loams that are moderately well and well drained with moderately coarse texture. The depth to the water table is more than 6 feet. The soils are not hydric. Urban land has been disturbed by construction activities in the past. The surface covered by pavement, concrete, buildings, and other structures underlain by disturbed and natural soil material (USDA 2011).

Current New Jersey regulations require the proponents of any construction activity that disturbs 1 or more acres of land to file a NJDEP National Pollutant Discharge Elimination System (NPDES) 5G3 Construction Activity Stormwater permit application. A stormwater pollution prevention plan (SWPPP) and an Erosion and Sediment Control Plan (ESCP) are required under this permit.

4.7.2 Consequences

There are no significant direct or indirect impacts on Geology and Soil for any alternative.

4.7.2.1 Alternative 1 – No Action Alternative

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

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

4.7.2.2 Alternative 2 – Caretaker Status Alternative

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

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

4.7.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. Short-term adverse and long-term adverse direct impacts to soil would be expected. Short-term adverse impacts to soil would occur because of 2 acres of soil disturbance associated with construction of permanent housing for the homeless by VOA. To reduce impacts of soil disturbance and compaction during and after construction, appropriate sediment control measures would be applied in accordance with local regulations. Such controls may include silt fences, hay bales, and seeding of cleared areas that are to remain exposed for long periods of time. Long-term adverse impacts to soil would be expected, as there would be an increase in erosion due to the decrease in the amount of vegetated surface on the Property. Vegetative cover tends

to slow down the movement of surface runoff and allows excess surface water to infiltrate rather than run off. Currently, approximately 75 percent (i.e., 5.75 acres) of the Brittin USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the construction of homeless housing units it is anticipated that there would be up to a 10 percent increase in the amount of impervious surface area, resulting in 6.3 acres of impervious surface throughout the Property once it is developed.

The Proposed Action would incorporate construction contractor compliance with NJDEP NPDES 5G3 Construction Activity Stormwater permit application. As part of this permit application a SWPPP and an ESCP should be developed. Even with implementation of controls, short-term soil erosion is anticipated.

Indirect Impacts. Implementation of Alternative 3 would have a long-term adverse effect on soil resources downslope from the Brittin USARC Property as there would be more off-site erosion due to the decrease in the amount of vegetated surface on the USARC Property.

4.8 Water Resources

4.8.1 Affected Environment

4.8.1.1 Surface Water

No surface water features are located in the immediate vicinity of the Brittin USARC Property. The Cooper River is the closest major surface water feature and is located 1.5 miles southwest of the Brittin USARC Property. The Cooper River discharges to the Delaware River, located 1.85 miles northwest of the Brittin USARC Property (USACE 2007).

The Cooper River is 16 miles long and its watershed encompasses an area of 40 square miles. The river flows through Camden County to the Delaware River at the City of Camden. It is classified by the NJDEP as FW-2 Non-trout: fresh waters that flow, at least partially, through privately owned lands, that are not maintained in their natural state of quality and are subjected to any man-made wastewater discharges. The Cooper River flows through heavily urbanized and industrial areas and has water quality problems related to both point source dischargers and urban stormwater runoff. The impacts on water quality are largely Nonpoint Source Pollution and legacy contamination found in the sediment load (NJDEP 2011).

As of August 2005, Brittin USARC was one of 31 USAR facilities covered under USAR Group Permit Application No. 383. The State of New Jersey, in which Brittin USARC resides, has NPDES permitting authority. Stormwater permitting in the state is handled by NJDEP.

There is no spill prevention control and countermeasures plan (SPCCP) associated with the Brittin USARC. However, there is a SWPPP associated with the Brittin USARC (Bowne AE&T Group 2005). Vehicle washing does not currently occur at the Brittin USARC. The vehicle wash rack is located southwest of the OMS building. The concrete-paved wash rack drains through two inlets into an oil-water separator (OWS) and the local sanitary sewer system. According to 77th RSC personnel, the soil

surrounding the OWS was sampled and analyzed for total VOCs, diesel, and gasoline range organics on April 10, 1998. The results of the analysis demonstrated that there is no soil contamination that exceeds the NJDEP soil cleanup criteria (USACE 2007). There have been no significant spills or leaks during the past 3 years at the Brittin USARC.

4.8.1.2 Hydrology/Groundwater

The Brittin USARC Property is situated at an elevation of approximately 40 feet above msl and is relatively flat. The land surface is situated on a plateau-like plain that gently slopes toward the Cooper River. Based on a review of the available topographic maps, the regional groundwater is anticipated to flow to the south-southwest toward the Cooper River, which discharges to the Delaware River. During the removal of the underground storage tanks (USTs) at the Brittin USARC Property in 1996, it was noted that groundwater was not encountered during the excavation activities. Groundwater was anticipated to be at a depth of 20 to 30 feet below grade (USACE 2007).

The major fresh water aquifers in Camden County are sands and gravels of Cretaceous and Tertiary age in the Potomac Group and the Raritan and Magothy Formations; the Cohansey Sand; the Wenonah Formation–Mount Laurel Sand; and the Englishtown Formation. Minor aquifers are found in parts of the Merchantville Formation, the undifferentiated Vincentown and Manasquan Formation, and the Kirkwood Formation (USGS 1976). Saturated sands and gravels in the surficial deposits of Quaternary age are commonly hydraulically connected to the underlying aquifer (USACE 2007).

A search of federal and state water well databases identified one groundwater well located approximately 0.25 mile east-southeast of the Brittin USARC. The public well is owned by the Wawa Store #377 and is currently active. There have been major violations associated with this public water supply. Nitrates and coliform were found in the water supply. The well is down gradient from the Brittin USARC, and there is no evidence that the contamination is from the Brittin USARC (USACE 2007).

4.8.1.3 Floodplains

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 34007C0029E, the Brittin USARC is not located in either the 100-year or the 500-year flood plain (FEMA 2011).

4.8.1.4 Coastal Zone

NJDEP is the lead agency for the New Jersey Coastal Management Program. The Brittin USARC Property is not included in the coastal zone management plan nor is it in a coastal zone (USACE 2007).

4.8.2 Consequences

There are no significant direct or indirect impacts on Water Resources for any alternative.

4.8.2.1 Alternative 1 – No Action Alternative

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

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

4.8.2.2 Alternative 2 – Caretaker Status Alternative

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

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

4.8.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. No short-term direct impacts to surface water are anticipated under Alternative 3 during reuse of the USARC buildings for Pennsauken Township and construction of the homeless housing units. There are no surface water bodies, floodplains, or coastal zones on the Property.

There would be long-term adverse direct impacts to groundwater recharge rates under Alternative 3. Approximately 75 percent of the Brittin USARC is covered by impervious surface features. With the construction of at least 12 homeless housing units on 2 acres, it is anticipated that there would be up to a 10 percent increase in the amount of impervious surface area throughout the Property once the housing units are developed.

Indirect Impacts. Short-term and long-term adverse indirect impacts are anticipated to water resources under Alternative 3.

Construction of the homeless housing units may cause a short-term increase in sediment runoff and loading into off-site water bodies from activities such as grading, vegetative clearing, and excavating.

Approximately 75 percent of the Brittin USARC is covered by impervious surface features. With the construction of at least 12 homeless housing units on 2 acres, it is anticipated that there would be up to a 10 percent increase in the amount of impervious

surface area throughout the Property once the housing units are developed. This would be a long-term adverse impact, as there would be an increase in surface water runoff into downstream water bodies.

4.9 Biological Resources

4.9.1 Affected Environment

4.9.1.1 Vegetation

The Brittin USARC is developed and urbanized. The vegetation is mowed cool season grass with ornamental shrubs and trees.

4.9.1.2 Wildlife

Wildlife present at the Brittin USARC consists of few species found in typical urban environments such as songbirds, rabbits, rodents, and invertebrates. The site has no known habitat or water source to support a wide variety of species.

4.9.1.3 Sensitive Species

Results of on-site surveys indicate that habitat for state- or federally listed species is not present on the Brittin USARC Property. A letter was sent to the USFWS requesting confirmation that the pre-written “No Effect” letter is appropriate for this action. This letter states that the proposed federal action would have no effect on federally listed species and has been included in Appendix A.

A general coordination letter was sent to the NJDEP requesting any information pertaining to any issues of concern within the agency’s regulatory jurisdiction. This letter has been included in Appendix A. Neither the USFWS nor NJDEP have responded to the coordination letters.

4.9.1.4 Wetlands

During the site reconnaissance, no wetlands were observed on the Brittin USARC Property. According to the USFWS National Wetlands Inventory (NWI) map, the Brittin USARC does not have any NWI wetlands located on or adjacent to the Property. According to the NWI map, the wetland nearest the Brittin USARC Property is approximately 0.75 mile to the east (USFWS 2011).

4.9.2 Consequences

There are no significant direct or indirect impacts on Biological Resources for any alternative.

4.9.2.1 Alternative 1 – No Action Alternative

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

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

4.9.2.2 Alternative 2 – Caretaker Status Alternative

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

Indirect Impacts. Because Alternative 2 is limited to the Brittin USARC Property, indirect impacts to biological resources are not anticipated.

4.9.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. Short-term adverse direct impacts could occur during construction of VOA housing units. Construction activities would displace any individuals utilizing the area for habitat.

No direct impacts to Biological Resources are expected from the transferred use of the administration building and OMS to Pennsauken Township. This action would not affect habitat on the site.

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

Indirect Impacts. Indirect short-term adverse impacts are anticipated to biological resources under Alternative 3 from construction of the VOA housing. Construction activities may increase sediment runoff and loading into off-site aquatic habitat and wetlands downstream of Brittin USARC Property. Best Management Practices (BMPs) that may be used prior to construction, such as barriers, tree protection, and buffer/filter strips, could minimize the effects. Recommendations during and following construction include silt fences, sediment traps, temporary cover crops, and other erosion control BMPs to reduce soil erosion at the site and the associated impacts to off-site wetlands. Even with implementation of controls, short-term soil erosion is anticipated.

4.10 Socioeconomics

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

- economic development,
- demographics,
- housing,
- quality of life,
- environmental justice in minority and low-income populations, and

-
- protection of children from environmental health risks and safety risks.

The Brittin USARC is located within the Camden, New Jersey Metropolitan Division, which includes Burlington, Camden, and Gloucester County. The term Metropolitan Divisions is used to refer to a county or group of counties within a larger metropolitan statistical area. While the Metropolitan Division is part of a larger region, it often functions as a distinct social, economic, and cultural area (OMB 2009). The Camden, New Jersey Metropolitan Division is the ROI for this socioeconomic analysis.

4.10.1 Affected Environment

The following sections discuss the existing economic and social conditions of the ROI. Information for Pennsauken Township, Camden County, and the State of New Jersey were included when available.

4.10.1.1 Economic Development

Local Economic Activity

The Brittin USARC has 12 full-time employees reporting to the facility Monday through Friday. During on-site weekend drill activities, approximately 330 reservists report to the facility for training. In addition to contributions from employees and reservists, a portion of the maintenance expenses accrued by the facility would be spent in the local economy.

Regional Economic Activity

In 2010, the southern region of New Jersey, which includes Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, and Salem County, had the smallest job losses among the state's three regions. The Camden Labor Area (Burlington, Camden, and Gloucester County) losses in 2010 were moderate (-1.9%) compared to the severe drop in 2009 (-3.5%). The labor losses in 2010 were due to the lingering effects of the recession that began in December 2007 and ended in June 2009 (State of New Jersey 2011a). The Camden, New Jersey Metropolitan Division labor force increased by approximately 2 percent (13,200 persons); however, unemployment for 2009 averaged 9.3 percent (62,874 persons) up from 5.5 percent (36,650 persons) in 2008. Civilian labor force statistics are given in Table 4.1.

Table 4.1 Annual Civilian Labor Force and Unemployment Rate, Brittin USARC Region and Larger Regions

Jurisdiction	Over-the-Year Change in Unemployment Rates 2008-2009	2009 Labor Force	2009 Unemployment Rate (%)
Camden County	4.0	271,395	10.0
Camden, New Jersey Metropolitan Division	3.8	676,162	9.3
New Jersey	3.6	4,554,000	9.1
United States	-	154,142,000	9.3

Source: US Department of Labor, Bureau of Labor Statistics, 2009 (BLS 2009)

In 2011, the outlook for the Camden Labor Area is for modest job gains with professional and business services, trade, transportation and utilities, leisure and hospitality, and educational and health services expected to register the largest average employment gains in the first 9 months of next year (State of New Jersey 2011a). Job losses may occur in manufacturing and government.

Within the ROI, retail trade, health care, and government employed the highest percentages. Non-Agricultural Wage and Salary Employment by NAICS Industry for the Camden Labor Area is shown in Table 4.2.

Table 4.2 Non-Agricultural Wage and Salary Employment by NAICS Industry for Camden Labor Area (Burlington, Camden, and Gloucester Counties (Not Seasonally Adjusted))

Industry	2009 Annual Average	2010 Annual Average	2009-2010 Change
Mining, Natural Resources, and Construction	21,000	19,133	-1,867
Manufacturing	39,700	37,533	-2,167
Trade, Transportation and Utilities	115,200	114,375	-825
Information	7,900	7,383	-517
Financial Activities	30,000	29,033	-967
Professional and Business Services	71,200	70,483	-717
Education and Health Services	80,600	80,925	325
Leisure and Hospitality	41,100	41,000	-100
Other Services	22,000	21,983	-17
Government	88,200	85,775	-2,425
Total Non-Agricultural	516,900	507,625	-9,275

Source: State of New Jersey Department of Labor Force and Workforce Development, Current Employment Statistics, 2009 -2010

4.10.1.2 Demographics

Regional Population

The ROI covers approximately 1,300 square miles with a density of 389 people per square mile. The smallest county within the ROI, Camden County, is 222 square miles with a density of 2,330 people per square mile while the largest county, Burlington County, is 805 square miles with a density of 554 people per square mile.

Although the Camden, New Jersey Metropolitan Division saw growth between 2000 and 2010, Pennsauken Township experienced a population decline during the same time period and Camden County experienced very little growth (approximately 4,725 persons). Between 2008 and 2009, Camden County ranked 17th out of 20 counties in New Jersey for overall growth. Although the county gained 2,425 people, it lost approximately 2,323 people from migration. Regional and local population trends are shown in Table 4.3.

Jurisdiction	2020 Projected Population ¹	Percent Change 2000-2010	2010 Population	2000 Population	1990 Population
Pennsauken Township	NA	(2.1)	34,958*	35,737	34,738
Camden County	538,800	<0	513,657	508,932	502,824
Camden, NJ Metropolitan Division	1,358,800	5.4	1,250,679	1,186,999	1,127,972
New Jersey	9,287,000	4.5	8,791,894	8,414,350	7,730,188

¹ New Jersey Department of Labor and Workforce Development, Division of Labor Market and Demographic Research (State of New Jersey 2011b).
 * Census 2009 Population Estimates
 Note: Parentheses denote decrease.
 Source: US Department of Commerce, US Census Bureau, 1990, 2000, and 2010 US Census

4.10.1.3 Housing

In 2009, the ROI had an average cost of living with a rating of 100 (the US average is 100). The median value of an owner occupied housing unit in the ROI was 28 percent higher than the US average of \$185,400. Approximately 56 percent of the housing in Camden County is single family housing. The next most common type of housing is one-unit attached (USCB 2009). Housing characteristics for the area are shown in Table 4.4.

Jurisdiction	Total Housing Units 2009	Percent Vacant 2009	Percent Owner Occupied 2009	Median Value Owner Occupied 2009	Median Rent Renter Occupied 2009	Median Household Income 2009
Pennsauken Township	13,348	3.9	82.5	\$181,000	\$822	\$59,589
Camden County	205,611	6.6	69.8	\$217,300	\$869	\$60,362
Camden, NJ Metropolitan Division	487,753	5.6	76.6	\$237,433	\$955	69,209
New Jersey	3,492,160	9.7	67.1	\$356,800	\$1,059	\$68,981
United States	127,699,712	11.8	66.9	\$185,400	\$817	\$51,425

Source: US Department of Commerce, Bureau of the Census, American Community Survey 2005-09.

There are 9,375 residential homes listed for sale in the ROI. Table 4.5 shows the price breakdown for the listed homes.

Listed Price Range	Number of Homes Listed		
	Burlington County	Camden County	Gloucester County
\$0-\$100,000	135	195	95
\$101,000 - \$150,000	461	624	389
\$151,000 - \$200,000	650	961	581
\$201,000 - \$250,000	503	683	496
\$251,000 - \$350,000	718	548	546
\$351,000 - \$400,000	268	186	198
Over \$400,000	677	203	258
TOTAL	3,412	3,400	2,563

Source: Weichert Realty, 2010

4.10.1.4 Quality of Life

Education

Each of the counties within the ROI has a county-wide public school district in addition to private schools. In Camden County, there are approximately 85,000 students attending public schools. There are 8 charter schools and 38 public schools (Camden County 2011). School information is shown in Table 4.6.

Table 4.6 Public School District and School information for Camden, NJ Metropolitan Division and State of New Jersey.				
Number	Burlington County	Camden County	Gloucester County	New Jersey
Elementary Schools	125	174	75	2,568
Middle Schools	30	30	15	441
High Schools	22	31	15	501
TOTAL	194	254	117	3,827
<i>Source: Schooltree, 2009</i>				

Health

The ROI has 12 hospitals. Of the three counties in the ROI, Camden County has the most with seven hospitals, while Gloucester County has the least with one. Our Lady of Lourdes Medical Center is located in the City of Camden approximately 2 miles to the east of Brittin USARC (Lourdes Health Systems 2011).

Law Enforcement

Law enforcement within the ROI is provided by county and municipal police departments. Pennsauken Township has a police department located approximately 2 miles northeast of the Brittin USARC. In addition to patrol and investigation, the police department has the following units: D.A.R.E., K-9, traffic safety, bicycle patrol, emergency medical service, and domestic violence counseling (Pennsauken Township Police Department 2011).

Fire Protection

Fire protection and emergency medical services are provided by municipal and township fire departments throughout the ROI. Pennsauken Fire Department has a staff of 18 full time personnel and 125 volunteers. There are five fire stations, a Bureau of Fire Prevention, and a fire administration building (Pennsauken Fire Department 2011). Pennsauken Emergency Medical Services is a paid squad with a chief, 5 street supervisors, 7 career Emergency Medical Technician (EMT), and 32 part time EMTs. They respond to approximately 4,800 emergency calls a year. The squad has a total of 4 ambulances with 2 in service 24 hours a day (Pennsauken Emergency Medical Services 2011).

Recreation

The ROI has an array of recreational facilities and opportunities for public use. Pennsauken Public Works manages recreation opportunities for the township. Residents have access to 24 community parks, 3 sports complexes/fields, a pool complex, tennis courts, and 8 school playgrounds (Pennsauken Township 2011).

4.10.1.5 Environmental Justice

On February 11, 1994, President Clinton issued EO 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. The purpose of this EO is to avoid the disproportionate placement of adverse environmental, economic,

social, or health impacts from federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as individuals or groups of individuals subject to an actual or potential health, economic, or environmental threat arising from existing or proposed federal actions and policies. Low-income, *i.e.*, at or below the poverty threshold, is defined as the aggregate annual mean income for a family of four in 2009 was \$21,954 and \$22,025 in 2008.

Table 4.7 summarizes minority and low income population for the area. The ROI has a slightly smaller percentage of minorities than the state. According to US Census Bureau estimates, the highest concentration of individuals in the metropolitan division below the poverty level is in Camden County (11.4%), which is higher than Burlington County (5.2%) and Gloucester County (7.2%). The Camden County Continuum of Care claims that a relatively high percentage of the county's homeless population (37%) reported being homeless for more than one year, indicating a high degree of chronic homelessness in this population (Pennsauken Township LRA 2009).

Jurisdiction	Total Population,	Percent Minority	Percent Black or African American,	Percent American Indian/ Alaska Native,	Percent Asian	Percent Some Other Race	Percent Ethnicity Hispanic/ Latino	Percent of Individuals Below Poverty Level
Pennsauken Township	35,160	49.0	26.3	0.1	8.7	11.6	19.0	9.0
Camden	79,263	84.5	49.9	0.8	2.6	28.5	42.1	38.3
Camden County	516,937	33.4	18.8	0.3	4.6	7.2	12.1	11.4
Camden, NJ Metropolitan Division (ROI)	1,247,790	24.5	14.8	0.2	3.6	3.5	7.1	7.9
New Jersey	8,650,548	29.8	13.6	0.2	7.4	6.8	15.9	8.8
United States	301,461,533	25.5	12.4	0.8	4.4	5.6	15.1	13.5

Notes: Native Hawaiian or Other Pacific Islander was removed from the table because for all areas in the ROI it was zero percent.

Source: US Department of Commerce, US Census Bureau, American Community Survey 2005-2009.

4.10.1.6 Protection of Children

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

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

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

Within 1 mile of the Brittin USARC, there are three private schools, one public high school, and one elementary school. The areas surrounding the Brittin USARC are primarily single family residential homes and commercial uses (see section 4.2).

4.10.2 Consequences

There are no significant direct or indirect impacts on Socioeconomics for any alternative.

4.10.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for socioeconomic resources are anticipated. Brittin USARC is home to the 417th Training Battalion, 357th Chemical Company, 716th Quartermaster Platoon, and the 1-114th Infantry Company New Jersey Army National Guard. Brittin USARC has approximately 12 full-time staff with an additional 329 soldiers on drill weekends. Brittin USARC is currently a minor contributor to the local and regional economy in respect to employment, personal income, and business sales. These contributions to the economy occur primarily on weekends during training at the reserve center and are related primarily to any lodging, food and miscellaneous expenses incurred by the weekend trainees. Minor additional economic contributions are incurred by the local economy in respect to the provision of services and supplies to the Brittin USARC.

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

4.10.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. The Brittin USARC would close and relocate to the new Camden Armed Forces Reserve Center. Both of the installations are located within the Camden, New Jersey Metropolitan Division; therefore, the impacts on the ROI and regional economy would not differ from baseline conditions. The potential exists for adverse impacts to businesses immediately surrounding the current facility that were used by Brittin USARC personnel.

There would be no need for any of the personnel to relocate; thus, there would be no impacts to housing, education, fire protection, law enforcement, health care, and other public resources.

Indirect Impacts. Under this alternative, there would be benefits foregone (short-term adverse indirect impact) from the delayed reuse of the Property. Pennsauken Township would lose immediate economic benefits from potential employment, sales, and payment of property taxes from the reuse of the site. Potential developers of the site would lose the immediate redevelopment opportunity and potential economic benefits. Residents of the Pennsauken community would lose any potential immediate

employment that may be created through the construction phase and reuse of the Property.

4.10.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

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

The Economic Impact Forecast System (EIFS) model, developed by the USACE Construction Engineering Research Laboratory, was used to assess the impacts of this alternative on the economy. The estimated total construction cost, including renovation of the OMS building, construction of a salt silo, and the VOA housing, of the new construction projects under Alternative 3 is approximately \$3,800,000 (2011 dollars). The estimated construction period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 4.31.

Table 4.8 provides the estimated direct, indirect, and total annual economic impacts of construction activities on business volume, income, and employment, as estimated by the EIFS model. These impacts would be realized over the length of the construction period. The increase in business volume, income, and employment includes capital expenditures, income, and labor directly associated with the construction activity. Table 4.8 also provides the indirect impacts on business volume, income, and employment because of the initial direct impacts of the construction activities. It should be noted that local construction phase workers are expected to be utilized and non-local workers would not relocate. Appendix C contains a description of the EIFS model and the EIFS reports on impacts.

Table 4.8 Estimated Annual Economic Impacts : Alternative 3 – Renovate OMS Building, Construct Salt Silo, and Construct VOA Housing				
Variable	Direct Impacts	Indirect Impacts	Total	RTV¹
Annual Construction Impacts²				
Sales (Business) Volume	\$2,462,589	\$8,151,170	\$10,613,760	0.02
Income	\$1,287,817	\$1,166,591	\$2,454,408	0.01
Employment	28	27	55	0.01
¹ Rational Threshold Value. ² 2011 Dollars. Source: Economic Impact Forecast System, US Army Corps of Engineers, Construction Engineering Research Laboratory.				

The EIFS model also includes a Rational Threshold Value (RTV) profile used in conjunction with the forecast models to assess the degree of the impacts of an activity for a specific geographic area. Appendix C contains a description of the RTV.

Table 4.8 provides the RTV associated with each of the economic impacts resulting from the construction activity. If the RTV for a variable is less than the maximum annual historic deviation for that variable, then the regional economic impacts are not considered significant. The regional positive RTVs for each economic variable are as follows: sales volume (12.36%); income (11.06%); employment (2.89%); and population (1.64%). Thus, the RTV for each of the variables was found to be considerably less than the respective regional RTV. For this reason, impacts associated with construction would occur on a regional basis, and not result in substantial annual beneficial impacts.

The Camden Armed Forces Reserve Center is located within the same ROI as the existing Brittin USARC. There would be no need for any of the Brittin USARC personnel to relocate; thus, there would be no impacts to housing, education, fire protection, law enforcement, health care, and other public resources.

There are long-term beneficial direct socioeconomic impacts of the Proposed Action related to environmental justice. The proposed reuse would include the construction of single-family homes, townhomes, or apartments, along with a support center, and for the homeless. These facilities would increase the quality of life for individuals and families utilizing the facilities. As seen in table 4.7, Camden County and nearby City of Camden have a higher concentration of individuals below the poverty level than other counties in the ROI. There would also be economic benefits to minority and low-income populations through employment during the construction phase of the Proposed Action.

There are no anticipated impacts to children from the Proposed Action. During construction, appropriate federal and State safety measures and health regulations would be followed to protect the health and safety of all residents as well as construction workers did. Safety measures, barriers and “no trespassing” signs would be placed around the perimeter of construction sites to deter children from playing in these areas, and construction vehicles and equipment would be secured when not in use.

Indirect Impacts. The anticipated increase in construction activity would have indirect socioeconomic impacts on the region. These impacts would be in employment; income; business volume; housing; educational and community facilities; public services; and government revenues and expenditures.

Short-term beneficial indirect economic impacts would be realized by the regional and local economy during the construction phase of this alternative. Employment generated by construction activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4.8.

There would be beneficial indirect impacts to Pennsauken Township from the reuse by the Public Works and OEM Departments. Once construction is complete and the new housing units are utilized by the community, there would be a long-term beneficial impact. The reuse would provide housing for individuals and families and fulfill a need in the community.

4.11 Transportation

4.11.1 Affected Environment

4.11.1.1 Roadways and Traffic

The Brittin USARC can be reached via US Route 130 and Federal Street (County Road 537). US Route 130 provides access to Interstate 76, approximately 4.5 miles to the south. The main roadway accessing the Brittin USARC Property is Federal Street.

The New Jersey Department of Transportation classifies the 0.17 mile stretch of Federal Street adjacent to the Brittin USARC as an 'urban local' functional class. County Road 537 is an 'urban minor arterial' roadway that travels in an east-west direction around the north side of the Property. US 130 travels in a north-south direction just east of the Brittin USARC and is classified as an 'urban principal arterial' roadway (NJDOT 2004).

4.11.1.2 Installation Transportation

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

4.11.1.3 Public Transportation

The Brittin USARC is located 2.8 miles from the Port Authority Transportation Corporation's (PATCO) Ferry Avenue Station. PATCO connects Camden County, New Jersey to the Southeastern Pennsylvania Transportation Authority (SEPTA). SEPTA provides public transportation services for the greater Philadelphia area. The Brittin USARC is 1.2 miles to the New Jersey Transit RiverLine 36th Street Station. The RiverLine rail connects the cities of Camden and Trenton, New Jersey traveling along the Delaware River.

New Jersey Transit provides bus service near the Brittin USARC. The closest bus stop is 0.16 mile west of the Brittin USARC with service on Routes 405 and 407. Bus route 409 has a stop 0.1 mile east of the Brittin USARC.

Although sidewalks exist on Federal Street and the surrounding streets, no painted bicycle lanes are present in the vicinity. The nearest bicycle lanes are located approximately 1 mile east of the Brittin USARC.

4.11.2 Consequences

There are no significant direct or indirect impacts on Transportation for any alternative.

4.11.2.1 Alternative 1 – No Action Alternative

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

4.11.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Long-term beneficial direct impacts are anticipated to roadways and traffic under Alternative 2. The number of military personnel and equipment driving to and from the Property would be reduced, especially on drill weekends. There would no longer be 12 personnel driving to and from the Brittin USARC on a daily basis. There would no longer be drill weekends, in which 329 people drive to and from the USARC.

A small number of vehicles would visit the facility occasionally as the Army provides for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of the Property.

4.11.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. Short-term adverse direct impacts to roadways and traffic are anticipated under Alternative 3. Construction vehicles normally have slower acceleration rates and wider turning radii. During the construction of the salt silo and OMS building modifications by Pennsauken Township and the construction of approximately 12 permanent housing units by the VOA, there would be increased congestion on Federal Street.

Long-term adverse direct impacts are anticipated to roadways and traffic under Alternative 3. The traffic pattern would change and there would be an increase in daily traffic volume. The Pennsauken Township OEM and Public Works property would have up to 30 employees on a daily basis, and 30-35 township-owned Public Works vehicles would also add to the daily traffic volume. There would be increased regular daily traffic as residents and support staff utilize the VOA Property. Both weekday and weekend traffic is expected to be more regular than traffic that normally occurs at the Brittin USARC. Reuse weekend traffic will be substantially less than what occurred once a month during drill weekends.

4.12 Utilities

4.12.1 Affected Environment

4.12.1.1 Potable Water Supply

The Merchantville-Pennsauken Water Commission (MPWC) provides potable water service to the Brittin USARC Property and the portion of the City of Camden east of the Cooper River. The MPWC is co-owned by the Borough of Merchantville and Pennsauken Township. In addition to Merchantville and Pennsauken, the MPWC also supplies water to areas in Cherry Hill Township and Camden. The MPWC has almost 16,000 connections serving almost 50,000 individuals. During winter months, the MPWC provides an average of 6 ½ million gallons per day, while during the summer months that daily number has averaged 7½ million gallons per day. The MPWC gets all of its water supply from 14 underground wells that tap the Potomac-Raritan-Magothy Aquifer. That water is then transmitted to the MPWC's six treatment facilities. The total capacity of the six above ground storage tanks is 8 million gallons of water. This type of water storage provides over a full day's worth of water supply to the entire service area in case of an emergency situation (MPWC 2011).

Based on a review of available historical site and agency records and interviews with site personnel, a water supply well is not located at the site (USACE 2007).

4.12.1.2 Wastewater System

Pennsauken Township provides sanitary sewer service to the Brittin USARC Property. The primary source of wastewater that is directed to the city sewer system includes non-process wastewater (bathrooms, sinks, etc.) and stormwater runoff (USACE 2007). The Brittin USARC Property is serviced by the County Regional Wastewater Treatment System, which treats the sewage discharged from properties in Camden County. The Camden County Municipal Utilities Authority treats 58 million gallons of sewage per day at two plants, the Delaware No. 1 Water Pollution Control Facility and the Winslow Water Pollution Control Facility (CCMUA 2011).

4.12.1.3 Storm Water System

The Brittin USARC has one stormwater outfall. A majority of the Brittin USARC, including motor pool storage and parking areas, drains northwest into an 18-inch corrugated metal pipe (outfall) that is connected to the local stormwater sewer system on Maple Avenue and operated by Pennsauken Township. Only grassy areas south of the main building drain into curbing along Federal Street. According to motor pool personnel, some stormwater runoff from Federal Street also drains into the facility during significant precipitation events (USACE 2007).

4.12.1.4 Energy Sources

Public Service Energy and Gas (PSE&G) provides natural gas and electric service to the Brittin USARC Property (USACE 2007). PSE&G currently serves nearly three quarters of New Jersey's population in a service area consisting of a 2,600-square-mile diagonal corridor across the state from Bergen to Gloucester Counties. PSE&G is the largest provider of gas and electric service, servicing 1.7 million gas customers and 2.1 million electric customers in more than 300 urban, suburban, and rural communities, including New Jersey's six largest cities (PSE&G 2011).

4.12.1.5 Communications

Verizon provides telecommunications services to the Camden area. Verizon is a large telecommunications provider with extensive regional coverage.

4.12.1.6 Solid Waste

The City of Camden Garbage and Trash Division oversees all aspects of solid waste and recycling collection and disposal (City of Camden 2011).

4.12.2 Consequences

There are no significant direct or indirect impacts on Utilities for any alternative.

4.12.2.1 Alternative 1 – No Action Alternative

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

4.12.2.2 Alternative 2 – Caretaker Status Alternative

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

4.12.2.3 Alternative 3 – Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. No direct impacts to utilities are anticipated under Alternative 3. Potential development of a city emergency management center and homeless housing would be consistent with the utilities demands of the Brittin USARC, thereby not substantially changing the utilities demand. All property reuse utility needs would be within the capacity of current utility providers. Electrical consumption of the reuse would occur from lighting the 12 units of multi-family homeless housing, and the emergency management center and parking lot.

4.13 Hazardous and Toxic Substances

4.13.1 Affected Environment

Specific environmental statutes and regulations govern hazardous material and hazardous waste management activities at the Brittin USARC. For the purpose of this analysis, the terms hazardous waste, hazardous materials, and toxic substances include those substances defined as hazardous by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), AR 200-1, and Toxic Substances Control Act (TSCA). In general, they include substances that, because of their quantity, concentration, or physical, chemical, or toxic characteristics, may present moderate danger to public health or welfare or the environment upon release. A Phase II Environmental Site Assessment was completed for the Brittin USARC in 2009. This facility was classified as a DoD ECP Area Type 3. A Type 3 classification is an area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action (USACE 2009b).

4.13.1.1 Uses of Hazardous Materials

Since 1953, the Brittin USARC has primarily functioned to provide organizational and limited direct support maintenance and technical assistance to support USAR units located in the region (USACE 2007).

Maintenance activities in the OMS building are limited to general vehicle servicing such as servicing oil filters, minor oil changes, greasing, topping off fluids, and limited direct support maintenance. Direct support maintenance consists of servicing electric pumps for fog oil generators. Military equipment serviced at the OMS includes high-mobility multipurpose wheeled vehicles, cargo trucks, tractors, lube service units, wreckers, forklifts, smoke and fuel generators, and fuel pods. All major vehicle maintenance is performed at Fort Dix, New Jersey. As a result of maintenance activities, small

quantities of POL products were used at the Brittin USARC. A wash rack and associated OWS is located southwest of the OMS building; however, the wash rack is not currently used (USACE 2007).

Chemicals used at the Brittin USARC are associated with vehicle maintenance activities, the use of fog oil by the 357th Chemical Company, and janitorial services. Chemicals are stored in designated storage areas at various locations throughout the Property (USACE 2007).

Radon surveys were performed on the Property in 1998. The results of both surveys indicated radon levels were below actionable levels set by the USEPA in the sampled locations (USACE 2007).

An Asbestos Survey was completed in 1998 for the Property and asbestos containing material (ACM) is known to exist in certain building materials. At the Brittin USARC, both friable and non-friable ACM are present in the administration building (pipe insulation above the ceiling tiles is reported as friable). The pipe insulation is damaged. Non-friable ACM is present in the floor tiles and associated mastic in the administration building. Materials observed in the OMS are assumed to be ACM as well (USACE 2007). A 2004 Asbestos Survey confirmed the presence of damaged, friable ACM in three types of thermal insulation and non-friable ACM in the floor tile and floor tile mastic. No ACM containing materials were observed in the OMS building. As of the 2007 ECP, no ACM removal activities have occurred (USACE 2007).

According to 88th RSC personnel, no known polychlorinated biphenyls (PCB) containing equipment is located on the Property. No transformers are located at the Brittin USARC (USACE 2007).

The Brittin USARC historically operated an indoor firing range. In 2000, range removal and abatement was performed. The 2000 closure report concluded that the Property was free of any accessible lead contamination associated with the firing range and the former firing range was safe for reoccupation. The former firing range is now used as a temporary classroom and storage space (USACE 2007).

Lead-based paint (LBP) has not been formally documented in either of the buildings. However, it is suspected that LBP is present in both buildings since the buildings were constructed before 1978. Painted surfaces remain in good condition with few areas of chipping paint on the interior painted surfaces (USACE 2007).

4.13.1.2 Storage and Handling Areas

Janitorial chemicals and building maintenance-related products were stored in designated areas within the main building. Hazardous materials including those used for vehicle maintenance, paints, solvent, acids, insecticides, and other POLs are stored within designated areas in the OMS building. Other hazardous materials are stored in the outdoor hazardous materials storage shed located southwest of the OMS building or in the POL shed located in the northwest corner of the Brittin USARC (USACE 2007)

The POL shed contains 55-gallon fog oil drums and 5-gallon fuel cans from the 357th Chemical Company. The shed has metal siding and a concrete floor. A concrete berm surrounds most of the interior floor (USACE 2007). The hazardous materials storage shed is located southwest of the OMS building. An inventory was not available

at the time of the site reconnaissance; however, the hazardous materials shed was noted to contain gear oil, engine oil, paint, cement, cleaning compound, five gallon jugs of diesel fuel, and unmarked POL product used by the 357th Chemical Company (USACE 2007).

Two heating oil USTs (1,000-gallon and 6,000-gallon), one gasoline UST (3,000-gallon), and one diesel fuel UST (2,000-gallon) were historically located at the Brittin USARC. All USTs were removed from the Property and there are currently no USTs at the Brittin USARC. Three ASTs for waste oil are currently located on the northern portion of the MEP area and these tanks are periodically emptied by a contractor (USACE 2007).

A 1997 UST Closure Site Assessment for the above listed USTs concluded that the use of tanks had not resulted in an adverse impact to the environment. Analytical results from subsurface soil samples collected during the UST excavation were below the NJDEP regulatory guidelines (USACE 2007).

4.13.1.3 Hazardous Waste Disposal

The Brittin USARC is listed as a RCRA-registered small quantity generator. A RCRA small quantity generator is defined as a facility generating between 100 and 1,000 kilograms of hazardous waste per month. Spent materials and hazardous wastes including antifreeze, automatic transmission fluid, oil, brake fluid, and oil filters are generated at the Brittin USARC through vehicle maintenance. No RCRA violations were identified for the Brittin USARC (USARC 2007). Disposal activities are in accordance with federal, state, local, and DoD requirements.

4.13.1.4 Site Contamination and Cleanup

A sink in the OMS building drains to a drywell (buried 55-gallon drum) located directly outside the northwest corner of the OMS building. For a period of time, the drywell was known to have been clogged, which resulted in discharges to the ground following precipitation events. As a result, the USACE 2007 ECP report assigned the Brittin USARC an ECP Area Type 7, which is an area or parcel of real property that is unevaluated or requires additional evaluation. A Phase II Environmental Site Assessment was performed in 2009 at the location of the drywell. Soil analytical results had detections of VOCs, SVOCs, and metals, but all were below NJDEP Residential Direct Contact Soil Cleanup Criteria (USACE 2009b). As a result the property category was changed from a Type 7 to a Type 3. A Type 3 classification is an area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action (USACE 2009b).

In 1996, 5 gallons of diesel fuel were released when a saddle tank was overfilled. No drains or waterways were impacted. Cleanup was reportedly completed; however, no records were available to confirm (USACE 2007).

According to an Environmental Data Resources (EDR) radius report noted in the 2007 ECP, there was a spill of fog oil in 1999 when a 55-gallon barrel was knocked over on the pavement in the MEP area. The same event was referred to in the 2000 Environmental Compliance Assessment Report as a leak from a fuel tanker containing

fog oil. Clean up was completed according to EDR, but there are no records available to confirm (USACE 2007).

A vehicle fuel pod was used as a fueling point for fog oil without secondary containment. Numerous spills were evident from stains and multiple layers of sorbent. The spill is reported closed (USACE 2007).

4.13.1.5 Special Hazards

No special hazards were identified at the Brittin USARC in the 2007 ECP Report (USACE 2007).

4.13.2 Consequences

There are no significant direct or indirect impacts on Hazardous and Toxic Substances for any alternative.

4.13.2.1 Alternative 1 – No Action Alternative

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

4.13.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Short-term beneficial direct impacts are expected to hazardous and toxic substances under this alternative. The Army would continue maintenance activities necessary to protect the Property and buildings from deterioration. The Army would remove fog oil and POLs from the Property prior to closure.

4.13.2.3 Alternative 3 - Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units

Direct Impacts. Short-term and long-term adverse direct impacts and long term beneficial direct impacts would occur through the reuse of the Brittin USARC Property. Under this alternative, the Property would be transferred from the Army to Pennsauken Township, the OEM, and the VOA “as is.” Therefore, no abatement activities would be performed by the Army prior to transfer of the Property to remove asbestos containing material or lead-based paint. The deeds transferring the property would contain covenants requiring the owners to manage LBP and ACM I accordance with all applicable regulations. The OEM and Pennsauken Township would utilize the existing buildings for offices, storage, training, and vehicle maintenance. The VOA would construct permanent housing for the homeless on their portion. Any disposal of existing hazardous materials (e.g., fog oil, POLs associated with the 357th Chemical Company, ACM) would be in accordance with federal, state, local, and DoD requirements. Long-term beneficial impacts are anticipated with the proper removal of these materials from the Property.

There would be short-term adverse direct impacts due to the potential for releases and spills that might occur during construction of the new salt bay and VOA housing units.

Continued operations on the Property by the Pennsauken Township would result in long-term adverse direct impacts due to the potential of leakage or spill of hazardous materials from vehicle maintenance and the use of the truck wash. This includes gasoline, diesel, hydraulic fluid, motor oil, transmission fluid, and antifreeze.

4.14 Cumulative Effects

4.14.1 Introduction

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

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

- **Cumulative Impact Analysis Area.** The cumulative impact analysis area includes the area that has the potential to be affected by implementation of the proposed action at the Brittin USARC. This includes the installation and the area immediately proximate to the installation boundary and varies by resource category being considered.
- **Past and Present Actions.** Past and present actions, other than the proposed action, are defined as actions within the cumulative analysis area under consideration that occurred before or during December 2010 (the environmental baseline for this EA). These include past and present actions at the project site and past and present demographic, land use, and development trends in the surrounding area. In most cases, the characteristics and results of these past and present actions are described in the Affected Environment sections under each of the resource categories covered in this EA.
 - The Brittin USARC is located in Camden County, in Pennsauken Township, New Jersey. The immediate area is primarily commercial, and residential areas surround the USARC Property.
 - The United States Government acquired the 7.7-acre parcel in 1952 from John R. Rich, Margaret Rasmussen, and Doris C. Webb. At the time of purchase, the Property was undeveloped.
 - The Property was an undeveloped, vacant parcel until construction of the administration building in 1952. Development in the general area began in the early 1940s and grew throughout the 1940s, 1950s and 1960s. An aerial photograph from 1967 shows the surrounding area heavily developed and similar to the appearance seen today (USACE 2007).
- **Reasonably Foreseeable Future Actions.** Reasonably foreseeable future actions are mainly limited to those that have been approved and that can be identified and defined with respect to timeframe and location. Reasonably

foreseeable future actions that have been identified and considered in the analysis of cumulative impacts, both on-USARC and off-USARC are listed below.

- West Maple Neighborhood Revitalization Project - the towns of Camden, Pennsauken, and Merchantville have received a Neighborhood Improvement Grant to revitalize West Maple neighborhood adjacent to the Brittin USARC. The project is primarily residential and is currently in planning phases. Activities associated with this action in the Cumulative Impacts analysis are referred to as “revitalization activities.”
- Route 130 Redevelopment Zone- this action is more general in nature with a lack of specific actions planned. The purpose of this action is to promote new businesses and underutilized businesses along N. Crescent Blvd. (Route 130) in Pennsauken Township. Activities associated with this action in the Cumulative Impacts analysis are referred to as “redevelopment activities.”

4.14.2 Potential Cumulative Impacts

4.14.2.1 Alternative 1 – No Action Alternative

Under Alternative 1 it is anticipated that past and present development trends on the installation and in the surrounding civilian community would continue. However, for the closure action directed by the BRAC Commission, it is noted that for the No Action Alternative, maintenance of current condition is not feasible, since the BRAC actions are Congressionally mandated actions.

4.14.2.2 Alternative 2 – Caretaker Status Alternative

Because many of the resources categories would suffer no impacts from base-line conditions under this Alternative, no cumulative effects would occur due to the proposed action. These resource categories include:

- Land Use
- Air Quality
- Noise
- Geology and Soil
- Water Resources
- Biological Resources
- Cultural Resources
- Utilities
- Hazardous and Toxic Substances.

Potential cumulative impacts under Alternative 2 for the resource categories not listed above include:

- **Aesthetic and Visual Resources.** Short-term adverse cumulative impacts could occur to aesthetic and visual resources during active revitalization of the West Maple Neighborhood, active redevelopment along Route 130, and while the Brittin USARC is in caretaker status. These impacts would be greater if all actions occur simultaneously. Once revitalization and redevelopment are complete, long-term beneficial impacts to aesthetics and visual resources in the general area would be seen due to improved aesthetics of local businesses and residences.
- **Socioeconomics.** Under this alternative, the Brittin USARC would close and relocate the units to a consolidated Armed Forces Reserve Center in Camden,

New Jersey. Both of the sites are located within the same MSA; therefore, the impacts on the ROI and regional economy would not differ from baseline conditions. There are no anticipated cumulative impacts

- **Transportation.** Short-term adverse cumulative impacts could occur to transportation during active revitalization of the West Maple Neighborhood and active redevelopment along Route 130. These impacts would be more realized if all actions occur simultaneously.

4.14.2.3 **Alternative 3 - Preferred Alternative: Traditional Army Disposal and Reuse by the Pennsauken Township for Use by Office of Emergency Management and to Volunteers of America for Construction of Housing Units**

Because impacts to resource categories listed below are not expected from the past, present, and foreseeable future actions described above, no cumulative impacts from the proposed action would occur to these same resources categories. The resource categories include:

- Land Use
- Geology and Soil
- Water Resources
- Biological Resources
- Utilities
- Cultural Resources

Potential cumulative impacts under Alternative 3 for the resource categories not listed above include:

- **Aesthetic and Visual Resources.** Short-term adverse cumulative impacts could occur to aesthetic and visual resources during active revitalization of the West Maple Neighborhood, active redevelopment along Route 130, and during VOA housing construction. During revitalization, redevelopment, and construction there would be adverse impacts from construction equipment and activities. These impacts would be greater if all actions occur simultaneously. Once revitalization, redevelopment, and construction are complete, long-term beneficial impacts to aesthetics and visual resources in the general area would be seen due to more attractive neighborhood resources.
- **Air Quality.** Revitalization, redevelopment, and construction activity associated with the proposed action and past, present, and foreseeable future actions would result in short-term adverse increase in air emissions. These actions would result in increased vehicles utilizing roadways in the local area causing an increase in mobile emissions.
- **Noise.** Revitalization, redevelopment, and construction activity associated with the proposed action and past, present, and foreseeable future actions would result in short-term adverse increase in noise. In addition, these actions would result in increased vehicles utilizing roadways in the local area causing an increase in noise levels.
- **Socioeconomics.** Short-term beneficial cumulative impacts would be in the form of increased business volume, income, and employment, associated with

revitalization, redevelopment, and construction activities. Beneficial long-term cumulative impacts would be realized by Pennsauken Township with improved residential areas in the West Maple neighborhood, a redeveloped business district along Route 130, and homeless housing associated with the proposed action.

- **Transportation.** Short-term adverse cumulative impacts could occur to transportation during active revitalization of the West Maple Neighborhood, active redevelopment along Route 130, and construction of VOA housing. While these actions are underway more vehicles would be utilizing the local roadways. These impacts would be more realized if all actions occur simultaneously.
- **Hazardous and Toxic Substances.** There would be short-term adverse cumulative impacts due to the potential for releases and spills that might occur during revitalization, redevelopment, and construction activities associated with past, present, and foreseeable future actions and the proposed action. These spills could be related to POL products such as gasoline, diesel, hydraulic fluid, motor oil, transmission fluid, and antifreeze; or spills could be related to building materials utilized during revitalization and redevelopment.

Short-term adverse and long-term beneficial cumulative impacts would occur through revitalization activities, redevelopment activities, and the reuse of the Brittin USARC Property. Disposal of existing hazardous materials (e.g., fog oil, POLs, ACM, LBP) from revitalized residences, redeveloped businesses, or the existing Brittin USARC would be in accordance with federal, state, local, and/or DoD requirements. During the disposal, the chance exists for exposure to these hazardous materials resulting in short-term adverse impacts. Long-term beneficial impacts are anticipated with the proper removal of these materials from the action areas.

4.15 Best Management Practices

As discussed in Sections 4.1 through 4.14 above, no significant adverse or significant beneficial impacts have been identified or are anticipated as a result of implementing any of the Proposed Action Alternatives or the No Action Alternative.

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

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SECTION 5.0 FINDINGS AND CONCLUSIONS

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

Any of the alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC law (Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended) ; consequently, it has not been selected for implementation.

Alternative 3 is the preferred alternative of the Army. This alternative would include the reuse of the facility by the Pennsauken Township OEM, Public Works Department, and the VOA.

Table 5.1 Impact Summary							
RESOURCE AREA ¹	NO ACTION	Alternative 2			Alternative 3		
		Direct	Indirect	Cumulative	Direct	Indirect	Cumulative
Land Use					X		
Aesthetic and Visual Resources		O		O	O, X		O, X
Cultural Resources							
Air Quality		X			O		O
Noise					O, X		O
Geology and Soil					O, X	O	
Water Resources					O	O	
Biological Resources		X			O	O	
Socioeconomics			O		X	X	X
Transportation		O, X		O	O		O
Utilities		X					
Hazardous and Toxic Substances		X			O, X		O, X
<p>X No Significant Beneficial Effect ◆ Significant Beneficial Effect</p> <p>O No Significant Adverse Effect ● Significant Adverse Effect</p> <p>¹A blank cell indicates no impact.</p>							

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

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USACE 2009b	US Army Corps of Engineers, Louisville District. 2009. Final Technical Memorandum, Phase II Environmental Site Assessment, SFC Nelson V. Brittin U.S. Army Reserve Center (NJ001), Pennsauken, New Jersey. August 2009.
USACE 2010	Environmental Assessment. Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Action in Camden, New Jersey. Prepared by US Army Corps of Engineers for the US Army Reserve 99 th Regional Support Command. May 2010.
USAR 2011	Department of the Army. Memorandum. Base Realignment and Closure (BRAC) Closure Report, Nelson Brittin USARC (NJ001). 15 September 2011.
USCB 1990	US Census Bureau. Decennial Census, 1990. Data accessed at URL: http://factfinder.census.gov . Accessed on February 22, 2011.

Citation	Description
USCB 2000	U.S. Census Bureau. Decennial Census, 2000. Data accessed at URL: http://factfinder.census.gov . Accessed on February 22, 2011.
USCB 2009	US Census Bureau, Population Estimates and Projections, 2009. Data accessed at URL: http://www.census.gov/popest/estbygeo.html Accessed on February 22, 2011
USCB 2010	US Census Bureau. Decennial Census, 2010. Data accessed at URL: http://factfinder2.census.gov . Accessed on February 22, 2011.
USCB 2006-9	US Census Bureau. American Community Survey 2006-8. Data accessed at URL: http://factfinder.census.gov . Accessed on April 19, 2010.
USDA 2011	US Department of Agriculture Natural Resources Conservation Service Web Soil Survey. http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx . Accessed February 15, 2011.
USFWS 2011	Wetlands Online Mapper. http://wetlandsws.er.usgs.gov/wtlnds/launch.html . Accessed on Feb 17, 2011.
USGS 1976	US Geological Survey (USGS). 1976. Geology and Groundwater Resources of Camden County, New Jersey.

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SECTION 9.0 PERSONS CONSULTED

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

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SECTION 10.0 ACRONYMS

A		dBA	Decibel A-Weighted Noise Levels
ACHP	Advisory Council on Historic Preservation	dBC	Decibel C-Weighted Noise Levels
ACM	Asbestos Containing Material	DNL	Day Night Average Sound Level
ADNL	A-Weighted Day Night Level	DoD	Department of Defense
AIRFA	American Indian Religious Freedom Act	E	
APE	Area of Potential Effect	EA	Environmental Assessment
AR	Army Regulation	ECP	Environmental Condition of Property
Army	US Army	EDR	Environmental Data Resources
ARPA	Archaeological Resources Protection Act	EIFS	Economic Impact Forecast System
AST	Aboveground Storage Tank	EIS	Environmental Impact Statement
B		EO	Executive Order
BMP	Best Management Practice	ESCP	Erosion and Sediment Control Plan
BRAC	Base Realignment and Closure	F	
C		FAA	Federal Aviation Administration
CAA	Clean Air Act	FEMA	Federal Emergency Management Agency
CDNL	C-Weighted Day Night Level	FNSI	Finding of No Significant Impact
CEQ	Council on Environmental Quality	FPPA	Farmland Protection Policy Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	G	
CFR	Code of Federal Regulations	H	
D		HPO	Historic Preservation Office
dB	Decibel		

HUD	Housing and Urban Development	NRCS	Natural Resource Conservation Service
I		NRHP	National Register of Historic Places
ICRMP	Integrated Cultural Resources Management Plan	NWI	National Wetlands Inventory
J		O	
K		OEM	Office of Emergency Management
L		OMB	Office of Management and Budget
LBP	Lead-Based Paint	OMS	Organizational Maintenance Shop
Leq	Equivalent Noise Level	OWS	Oil-Water Separator
LRA	Local Redevelopment Authority	P	
M		PATCO	Port Authority Transportation Corporation
MEP	Military Equipment Parking	PCB	Polychlorinated biphenyls
MPWC	Merchantville-Pennsauken Water Commission	POL	Petroleum, Oils, and Lubricants
MSA	Metropolitan Statistical Area	PM _{2.5}	particulate matter equal to or less than 2.5 microns in size
msl	mean sea level	PM ₁₀	particulate matter equal to or less than 10 microns in size
N		PSE&G	Public Service Energy & Gas
NAAQS	National Ambient Air Quality Standards	Q	
NAGPRA	Native American Graves Protection and Repatriation Act	R	
NEPA	National Environmental Policy Act	RCRA	Resource Conservation and Recovery Act
NHPA	National Historic Preservation Act of 1966	ROI	Region of Influence
NJDEP	New Jersey Department of Environmental Protection	RONA	Record of Non-Applicability
NOI	Notice of Intent	RSC	Regional Support Command
NPDES	National Pollutant Discharge Elimination System	RTV	Rational Threshold Values

S		USEPA	United States Environmental Protection Agency
SEPTA	Southeastern Pennsylvania Transportation Authority	USFWS	United States Fish and Wildlife Service
SIP	State Implementation Plan	USGS	United States Geological Survey
SPCCP	Spill Prevention Control and Countermeasures Plan	UST	Underground Storage Tanks
SWPPP	Stormwater Pollution Prevention Plan		
		V	
T		VOA	Volunteers of America Delaware Valley, Inc.
TSCA	Toxic Substances Control Act	VOC	Volatile Organic Compounds
U		W	
US	United States		
USACE	United States Army Corps of Engineers	X	
USAR	United States Army Reserve	Y	
USARC	United States Army Reserve Center	Z	
USC	United States Code		

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APPENDIX A - AGENCY COORDINATION

A.1 Initial Coordination Letters	3
A.2 HPO – Section 106 Consultation	34
A.3 USFWS Consultation	50
A.4 Agency and Public Notices	54

Public and Agency Comments

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

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

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

http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

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A.1 Initial Coordination Letters

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

<u>Agency</u>	<u>Date</u>
Letter to Local Redevelopment Authority (Initial Consultation)	Mar 31, 2011
Letter to NJDEP (Initial Consultation)	Mar 31, 2011
Letter to New Jersey Department of Children and Families (Initial Consultation)	Mar 31, 2011
Letter to New Jersey Department of Community Affairs (Initial Consultation)	Mar 31, 2011
Letter to New Jersey Department of Transportation (Initial Consultation)	Mar 31, 2011
Letter to Office of the Secretary of State (Initial Consultation)	Mar 31, 2011
Letter to NRCS (Initial Consultation)	Mar 31, 2011
Letter to USEPA (Initial Consultation)	Mar 31, 2011
Response from New Jersey Department of Children and Families	Apr 18, 2011
Letter to New Jersey Department of Human Services	Apr 22, 2011
Response from USEPA	Apr 21, 2011
Response from New Jersey Division of Fish and Wildlife	May 6, 2011
Response from NJDEP	May 5, 2011

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Mr. Larry Cardwell
Pennsauken Township Municipal Building
5605 North Crescent Blvd
Pennsauken NJ 08110

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Mr. Cardwell:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the closure, disposal, and reuse of the Brittin USARC is to meet the requirements of the Base Realignment and Closure Act. The Brittin USARC is located at 3911 Federal Street, Pennsauken, New Jersey. The site is 7.7 acres in size and contains two buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Three alternatives are being considered for the proposed action and all would occur at the current location of the Brittin USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Brittin USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

Mr. Larry Cardwell
Page 2

The Army's Preferred Alternative (Alternative 3) involves the closure of the Brittin USARC and subsequent transfer of the property to the Pennsauken Township and Volunteers of America (VOA). The township would reuse 5+ acres of the existing facilities for Emergency Management Services, public works, and salt storage. VOA would reuse 2+ acres to provide permanent housing units for the homeless.

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

- Issues of concern within your regulatory jurisdiction
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Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047.

Sincerely,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:

- Figure 1: Site Vicinity Map
- Figure 2: Topographic Map
- Figure 3: Current Site Plan
- Figure 4: Reuse Plan



DEPARTMENT OF THE ARMY
THE ADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Bob Martin, Commissioner
New Jersey Department of Environmental Protection
401 E. State St.
7th Floor, East Wing
P.O. Box 402
Trenton, NJ 08625-0402

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Mr. Martin:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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Mr. Bob Martin
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Sincerely,

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Ms. Allison Blake, Commissioner
New Jersey Department of Children and Families
222 South Warren Street
PO Box 729, 3rd Floor
Trenton, NJ 08625-0729

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Ms. Blake:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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Ms. Allison Blake
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Sincerely,

Jeffrey M. Hrzic
Chief, Environmental Division

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Ms. Lori Grifa, Commissioner
New Jersey Department of Community Affairs
101 South Broad Street
PO Box 800
Trenton, NJ 08625-0800

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Ms. Grifa:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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Ms. Lori Grifa
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DEPARTMENT OF THE ARMY
THE ADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Mr. Charles Kingsland
New Jersey Department of Transportation
South Region
One Executive Campus
Route 70 West, 3rd Floor
Cherry Hill, NJ 08002

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Mr. Kingsland:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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Mr. Charles Kingsland
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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Kim Guadagno, Lieutenant Governor
Office of the Secretary of State
PO Box 300
Trenton, NJ 08625-0300

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Ms. Guadagno:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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Ms. Kim Guadagno
Page 2

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Sincerely,

Jeffrey M. Hrzic
Chief, Environmental Division

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Ms. Nicole Ciccaglione
Natural Resources Conservation Service
Columbus Service Center
1971 Jacksonville Jobstown Rd.
Columbus, NJ 08022

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Ms. Ciccaglione:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the closure, disposal, and reuse of the Brittin USARC is to meet the requirements of the Base Realignment and Closure Act. The Brittin USARC is located at 3911 Federal Street, Pennsauken, New Jersey. The site is 7.7 acres in size and contains two buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Three alternatives are being considered for the proposed action and all would occur at the current location of the Brittin USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Brittin USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

Ms. Nicole Ciccaglione
Page 2

The Army's Preferred Alternative (Alternative 3) involves the closure of the Brittin USARC and subsequent transfer of the property to the Pennsauken Township and Volunteers of America (VOA). The township would reuse 5+ acres of the existing facilities for Emergency Management Services, public works, and salt storage. VOA would reuse 2+ acres to provide permanent housing units for the homeless.

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

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

Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047.

Sincerely,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:
Figure 1: Site Vicinity Map
Figure 2: Topographic Map
Figure 3: Current Site Plan
Figure 4: Reuse Plan



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Ms. Grace Musumeci
US EPA Region 2
Regional NEPA Coordinator
290 Broadway
New York, New York 10007-1866

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Ms. Musumeci:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

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NEPA requires that alternatives to the proposed action are analyzed. Three alternatives are being considered for the proposed action and all would occur at the current location of the Brittin USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Brittin USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

Ms. Grace Musumeci
Page 2

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

- Issues of concern within your regulatory jurisdiction
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- Mitigation or permitting requirements that may be necessary for project implementation.

Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047.

Sincerely,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:
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Figure 4: Reuse Plan

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

From: Robert Butcavage [<mailto:Robert.Butcavage@dcf.state.nj.us>]
Sent: Monday, April 18, 2011 1:26 PM
To: Murphy, Amanda W Ms CTR 99TH RSC ARIM
Cc: Barbara Rusen
Subject: SFC Nelson V. Brittin USARC

Ms Murphy,

Thank you for the opportunity to comment on the re-use of the SFC Nelson V. Brittin USARC in Pennsauken NJ. Upon our review it appears that the Department of Human Services (DHS) would be more appropriate than the Department of Children and Families (DCF) to have a chance to comment on the proposal since DHS would be more likely to provide services to the intended client base.

Rob Butcavage

DCF Director of Facilities and

Support Services

609-292-1790



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

April 18, 2011

Ms. Jennifer Velez, Commissioner
New Jersey Department of Human Services
222 South Warren Street
PO Box 700
Trenton, NJ 08625-0729

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Ms. Velez:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the closure, disposal, and reuse of the Brittin USARC is to meet the requirements of the Base Realignment and Closure Act. The Brittin USARC is located at 3911 Federal Street, Pennsauken, New Jersey. The site is 7.7 acres in size and contains two buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

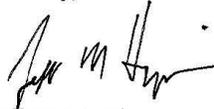
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identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

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

Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047.

Sincerely,



Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:

- Figure 1: Site Vicinity Map
- Figure 2: Topographic Map
- Figure 3: Current Site Plan
- Figure 4: Reuse Plan



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

APR 21 2011

Amanda Murphy
99th RSC DPW
Environmental Division
5231 South Scott Plaza
Fort Dix, NJ 08640

Subject: Scoping letter for an Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Ms. Murphy:

This is a response to your scoping letter dated March 31, 2011 for the Environmental Assessment (EA) for the closure, disposal and reuse of the SFC Nelson V. Brittin US Army Reserve Center. The preferred alternative (Alternative 3) for the project involves the closure of the center and subsequent transfer of property to Pennsauken Township and the Volunteers of America (VOA). As stated in your letter, the township would reuse five plus acres of the existing facilities for Emergency Management Services, public works, and salt storage. VOA would reuse two plus acres to provide permanent housing units for the homeless.

Though it was unclear from your letter what activities will specifically take place as a result of the selection of the preferred alternative, EPA is assuming there would be construction on greater than one acre of property and as such, a construction general permit would be required. Additionally, we would like to work with the Army to help ensure that green techniques are part of the future use of the property. Specifically, we would like to encourage that the conditions of the transfer of the land integrate sustainable development requirements. EPA administers a number of sustainable development and pollution prevention programs which promote the use of local and/or recycled materials; recycling of materials generated onsite; and the use of low emissions technology and fuels in development and construction projects. These programs are highlighted in the enclosed document, "U.S. EPA Region 2, Green Recommendations." We hope you will review these recommendations and consider integrating them into the transfer agreement and your EA wherever possible.

Thank you for the opportunity to comment. Should you have any questions concerning this letter, or if we can be of assistance with the integration of sustainable design requirements into the EA, please feel free to contact Stephanie Lamster of my staff at 212-637-3465.

Sincerely,

Grace Musumeci, Chief
Environmental Review Section

Internet Address (URL) • <http://www.epa.gov>

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U.S. EPA Region 2 Green Recommendations¹

Recommendations:

To the maximum extent possible, projects are encouraged to use local and/or recycled materials; to recycle materials generated onsite; and to utilize low emissions technology and fuels. Further, they should use, to the extent feasible, renewable energy (including, but not limited to solar, wind, geothermal, biogas, and biomass) and energy efficient technology in the design, construction, and operation of transportation, building, and infrastructure projects.

- **Promote the use of recycled materials in highway and construction projects**
Many industrial and construction byproducts are available for use in road or infrastructure construction. Use of these materials can save money and reduce environmental impact. The Recycled Materials Resource Center has developed user guidelines for many recycled materials and compiled existing national specifications. <http://www.recycledmaterials.org/tools/uguidelines/index.asp>
<http://www.recycledmaterials.org/tools/uguidelines/standards.asp>
<http://www.epa.gov/osw/conserv/rrr/imr/index.htm>
- **Encourage safe reuse and recycling of construction wastes**
Promote reuse and recycling at the 50% (by weight) level for building, road, and bridge project construction and demolition debris wastes. The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification.
http://www.wbdg.org/design/greenspec_msl.php?s=017419
- **Encourage water conservation in building construction**
Promote the use of water-efficient products to be used in new building construction through the use of WaterSense-labeled products and the use of contractors certified through a WaterSense-labeled program. <http://www.epa.gov/watersense/water/fed-agency.htm>
- **Encourage sustainable storm water management at building sites**
Implement site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the building site with regard to the temperature, rate, volume, and duration of flow.
http://cfpub.epa.gov/npdes/home.cfm?program_id=298
Consider designs for storm water management on compacted, contaminated soils in dense urban areas:
<http://www.epa.gov/brownfields/publications/swdp0408.pdf>.
- **Encourage cost-efficient, environmentally friendly landscaping**
EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make

¹“Green” here means environmentally sound practices in general and is not equivalent to the specific “green infrastructure” requirements in the American Recovery and Reinvestment Act (ARRA). Please note that this list is not meant to be all inclusive.

more holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use. <http://www.epa.gov/osw/conserve/rrr/greenscapes/index.htm>

- **Encourage Low Impact Development to help manage storm water**
Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product.
<http://www.epa.gov/nps/lid/>
- **Incorporate onsite energy generation and energy efficient equipment upgrades into projects at drinking water and wastewater treatment facilities**
Promote the use of captured biogas in combined heat and power systems and/or renewable energy (wind, solar, etc.) to generate energy for use onsite as well as upgrades to more energy efficient equipment (pumps, motors, etc.)
http://www.epa.gov/waterinfrastructure/bettermanagement_energy.html
- **ENERGY STAR/Multi-media green building and land design practices**
Require green building practices which have multi-media benefits, including energy efficiency, water conservation, and healthy indoor air quality. Apply building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense for stimulus funded building construction. Third party high-bar, multimedia standards should be required for building construction and land design (LEED and Sustainable Sites Initiative, Collaborative for High Performance Schools (CHPS), or local equivalent).
<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=64>
http://www.energystar.gov/index.cfm?c=business.bus_bldgs
http://www.energystar.gov/index.cfm?c=bldrs_lenders_raters.nh_iap
- **Encourage land development in brownfield and infill sites**
Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. These sites are often “infrastructure-ready,” eliminating the need to build new roads and utility lines which are necessary in undeveloped land.
<http://www.epa.gov/brownfields/>
- **Use the Integrated Design process on building developments**
Current procurement practices tend to separate out development into distinct stages that discourage communication across the project lifecycle. The Integrated Design process calls for the active and continuing engagement of all stakeholders throughout the building design, development, and construction phases including the owners, architects, engineers, building department officials, and other professionals. This process can help create a higher performing building at lower costs, allows for various building systems to work together, eliminates redundancy from overdesign and unnecessary capacity, and minimizes change orders during the construction phase. We encourage revising procurement practices so that it can use the Integrated Design process.
http://www.wbdg.org/design/engage_process.php
- **Encourage use of Smart Growth and transit oriented development principles**
Smart Growth and transit oriented development (TOD) principles help preserve natural lands and critical environmental areas, and protect water and air quality by encouraging developments that are walkable and located near public transit.
<http://www.epa.gov/smartgrowth>

-
- **Ensure environmentally preferable purchasing**
Promote markets for environmentally preferable products by referencing EPA's multi-attribute Environmentally Preferable Purchasing guidance. <http://www.epa.gov/epp>
 - **Purchase 'green' electronics, and measure their benefits**
Require the purchase of desktop computers, monitors, and laptops that are registered as Silver or Gold products with EPEAT, the Electronics Product Environmental Assessment Tool (www.epeat.net). Products registered with EPEAT use less energy, are easier to recycle, and can be more easily upgraded than non-registered products. Energy savings, CO₂ emission reductions, and other environmental benefits achieved by the purchase, use and recycling of EPEAT-registered products can be quantified using the Electronics Environmental Benefits Calculator (<http://eerc.ra.utk.edu/ccpct/eebc/eebc.html>).
 - **Incorporate greener practices into remediation of contaminated sites**
Encourage or incentivize the use of greener remediation practices, including designing treatment systems with optimum energy efficiency; use of passive energy technologies such as bioremediation and phytoremediation; use of renewable energy to meet power demands of energy-intensive treatment systems or auxiliary equipment; use of cleaner fuels, machinery, and vehicles; use of native plant species; and minimizing waste and water use. <http://clu.in.org/greenremediation/index.cfm>
 - **Ensure clean diesel practices**
Implement diesel controls, cleaner fuel, and cleaner construction practices for all on- and off-road equipment used for transportation, soil movement, or other construction activities, including:
 - 1) Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits;
 - 2) Use of ultra low sulfur diesel fuel in nonroad applications ahead of the mandate; and
 - 3) Use of the cleanest engines either through add-on control technologies like diesel oxidation catalysts and particulate filters, repowers, or newer, cleaner equipmentEncourage entities to consider adopting contract specifications requiring advanced pollution controls and clean fuels. A model spec is online at (applies to both on and non-road engines): <http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>
Additional Information: <http://www.epa.gov/diesel/construction/contract-lang.htm>
How to guide: <http://www.mass.gov/dep/air/diesel/conretro.pdf>



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF FISH AND WILDLIFE
Mail Code 501-03
PO BOX 420
Trenton, NJ 08625-0420
David Chanda, Director
www.NJfishandWildlife.com
(609) 292-2965

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

May 6, 2011

Mr. Jeffrey M. Hrzic, Chief
Department of the Army
Environmental Division
5231 South Scott Plaza
Fort Dix, N.J. 08640-5000

RE: SFC Nelson V. Brittin USARC Closure
NEPA Initial Scoping Document
3911 Federal Street
Block 4517, Lot 2
Pennsauken, Camden County

Dear Mr. Hrzic,

The NJ Division of Fish & Wildlife (DFW) finds that the Army's preferred Alternative 3, which involves the closure of the Brittin USARC and subsequent transfer of 5+ acres of the property to Pennsauken Township for emergency management services and 2+ acres to the Volunteers of America (VOA) for construction of permanent housing for the homeless, should have no adverse effects to designated wilderness areas, designated wilderness preserves, threatened or endangered species or designated critical habitats.

If there are any questions concerning these comments please contact me at (908-236-2118).
I hope this information is of service to you.

Sincerely,

Kelly Davis, Ast. Biologist - Fisheries
N.J. Division of Fish and Wildlife - Office of Environmental Review
P.O. Box 394, 1255 County Rt. 629
Lebanon, NJ 08833
Tel: (908) 236-2118 Fax: (908) 236-7280
kelly.davis@dep.state.nj.us

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State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW
P.O. Box 420 Mail Code 401-07J Trenton, New Jersey 08625-0420
Telephone Number (609) 292-3600
FAX NUMBER (609) 633-2102

BOB MARTIN
Commissioner

May 5, 2011



Jeffrey M. Hrzic, Chief
Department of the Army
Environmental Division
5231 South Scott Plaza
Fort Dix, N.J. 08640-5000

RE: SFC Nelson V. Brittin USARC Closure
NEPA Initial Scoping Document
3911 Federal Street
Block 4517, Lot 2
Pennsauken, Camden County

Dear Mr. Hrzic:

The Department of Environmental Protection's (Department) Office of Permit Coordination and Environmental Review (PCER) has coordinated with applicable programs the review of your letter received by the Department dated March 31, 2011. To meet the requirements of the National Environmental Policy Act (NEPA) and the Base Realignment and Closure Act, the United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed closure of the above Brittin USARC facility. It is our understanding that the EA will be submitted to the Department in the Summer of 2011 and will provide the Department with an opportunity to fully review and provide comment on the purpose and need for the closure, the disposal of the property, and an analysis of three alternatives for reuse of the site, as well as any potential environmental impacts that may result from the approved action.

While a feasibility analysis of Alternative 1 (No Action) and Alternative 2 (Caretaker Status Alternative) will be included in the EA, the Army's preferred Alternative 3 involves the closure of the Brittin USARC and subsequent transfer of 5+ acres of the property to Pennsauken Township for emergency management services and 2+ acres to the Volunteers of America (VOA) for construction of permanent housing for the homeless.

The Department offers the following preliminary comments and reserved its right to modify these comments as more information is available:

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1. The Department strongly recommends that the Army complete a full due diligence review of the property prior to any commitment or action by the Army. This may include a review of all Department files related to these and neighboring properties through the Open Public Records Act (OPRA).

2. A review of Department databases are enclosed and indicate the following which are cursory and shall be confirmed by the applicant during a due diligence review of all Department records:

- **Site Remediation:** The site is located in an area designated as State Planning Area PA-1: Metropolitan. The site is bounded to the south by an area designated as a State Plan Urban Center. The Department has no record of any contaminated site investigation at this location. However, there is a known contaminated site (Pennsauken Maintenance Yard) currently under review by the Department and located less than 1000 feet to the east of the site. For further assistance identifying the most current site investigation data for this neighboring property, please contact Robert Soboleski at (609)984-2990.
- **Land Use -** The site is occupied by several buildings, parking lots, and grassed areas and is surrounded by roads and commercial development. The site does not appear to have any streams, wetlands or wetland transition areas. There does not appear to be any Land Use regulatory impediments to the development of Alternative 3 for reuse as housing and a public works facility. From the information provided, it can not be determined if any part of the site is in a 100-year floodplain. If a 100-year floodplain is present, a Flood Hazard Permit would be required for any construction within the floodplain. However, the presence of a floodplain in this instance would not be an impediment to the development of the site. For any additional land use information, please contact Christopher Jones at (609) 633-6757.
- **Natural and Historic Resources - Historic Preservation Office (HPO):** In a letter to Amanda Murphy at the 99th Regional Support Command on April 14, 2011, the HPO concurs with the Army's determination that the buildings at the Nelson Brittin USARC are not eligible for listing in the New Jersey or National Register of Historic Places. In addition, pursuant to Section 106 of the National Historic Preservation Act, the HPO also outlined in the letter additional documentation required to complete the evaluation of the site's archaeological potential. Furthermore, the site is bounded to the north of the property by the right-of-way of the Camden and Burlington County Railroad Historic District (SHPO Opinion of Eligibility 2/22/06. For additional information, please contact Kate Marcopul at (609) 984-5816.
- **Natural and Historic Resources – Threatened and Endangered Species:** although our cursory review did not indicate any known threatened and endangered species at the site, please confirm by contacting Kelly Davis at 908-236-2118.
- **Safe Drinking Water and Sewer Capacity -** the site has connections to a public potable water supply and to a publicly owned treatment works (POTW). Any questions regarding available water supply should be directed to John Fields 609-984-

6831, POTW sewer capacity to William Purdie 609-633-1133, or changes to a treatment works approval sewer conveyance to Tracy Shevlin 609-633-1169.

Thank you again for this opportunity for initial comment on this project. We look forward to receipt of the Environmental Assessment for review. If you have any additional general questions regarding the redevelopment of these sites, please contact Ruth Foster, Supervisor of the Office of Permit Coordination and Environmental Review at (609) 292-3600.

Sincerely,



Scott Brubaker, Director
Office of Permit Coordination
and Environmental Review

Enclosures

c. Ruth Foster, PCER



* Details of "New Jersey Parcels Data"	
Attribute	Value
PAMS Pin	0427_4517_2
Municipality Code	0427
Block	4517
Lot	2
Qualifier Code	
County	CAMDEN
Municipality	Pennsauken Township
Mod4block	04517
Mod4lot	00002
Qualifier	
Property Class	15C
Property Location	3911 FEDERAL ST
Owner	US ARMORY
Street	FEDERAL ARMORY
City State	WASHINGTON, DC
ZIP Code	20315
Land Value	450000
Improvement Value	951100
Net Value	1401100
Last Year Tax	0
Environmental Concerns Within the Parcel	
Pams Pin	0427_4517_2
Wetlands (2007)	No
Streams	No
Open Space (State)	No
CAFRA Boundary (Polygon)	No
CAFRA Coastal Centers	No
CAFRA Coastal Planning Areas	No
Known Contaminated Sites List (buffered by 1000 ft)	Yes
Sewer Service Areas	Yes
Pinelands Boundary	No
Highlands	No
New Jersey Meadowlands Commission	No
Landscape Project Ranks 3,4,5	No
Historic Properties	No
Natural Heritage Priority Sites	No
Category One Waters	No
Historic District	No
Deed Notice Areas	No
Groundwater Contamination Areas (CEA)	No
Water Bodies	No
Purveyor	Yes
State Planning Areas	No
Critical Environmental and Historic Sites	No
State Plan Centers	No
State Plan - Historic and Cultural Sites	No
Delaware and Raritan Canal Commission Review	No
Zones	
Tidelands Claimed Areas	No

A.2 HPO – Section 106 Consultation

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

<u>Agency/Tribe</u>	<u>Date</u>
Letter to New Jersey HPO (Initial Consultation & Determination of Eligibility)	Feb 24, 2011
Letter to Delaware Nation (Initial Consultation)	Mar 31, 2011
Letter to Delaware Tribe of Indians, Oklahoma (Initial Consultation)	Mar 31, 2011
Letter to Stockbridge Munsee Community of Wisconsin (Initial Consultation)	Mar 31, 2011
Response from New Jersey HPO	Apr 14, 2011
Letter to New Jersey HPO (Archeological Findings)	June 21, 2011
Response from New Jersey HPO (Archeological Findings)	Aug 22, 2011

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

FEB 24 2011

Mr. Bob Martin
State Historic Preservation Officer
New Jersey Historic Preservation Office
Department of Environmental Protection
401 East State Street
PO Box 420
Trenton, NJ 08625-0420

Reference: Section 106 Initiation and Determination of Eligibility for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken Township, Camden County, New Jersey

Mr. Martin,

In accordance with recommendations of the Base Realignment and Closure Act, the United States Army Reserve 99th Regional Support Command (RSC) is proposing closure, disposal, and reuse of the SFC Nelson Brittin United States Army Reserve Center (Brittin USARC) located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey. The proposed transfer of property out of federal ownership is an undertaking that has the potential to result in an adverse effect on historic resources. A site plan for the USARC's intended re-use is enclosed.

The Brittin USARC covers approximately 7.7 acres and contains five buildings and structures: the main administration building, consisting of an administrative/classroom block and a drill hall, a detached organizational maintenance shop (OMS), a petroleum, oil, and lubricant (POL) storage building, a hazardous waste storage shed, and a vehicle wash area (Figures 1-3). The main building and OMS building were constructed in 1953; the other structures were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), for this project consists of the current boundaries of the Brittin USARC facility, including the five buildings and structures, and paved and landscaped areas on the parcel. The 99th RSC completed an Integrated Cultural Resources Management Plan (ICRMP) 2009-2014 in September 2009 which included information on previous cultural resources investigations and resources at their managed facilities. Two previous archaeological studies were conducted on the Brittin USARC parcel: a survey for a utility line project in which no archaeological resources were identified on or adjacent to the Brittin USARC and a Phase IA study consisting of pedestrian reconnaissance and archival research. Based on a Phase IA study, the Brittin USARC was considered to have some potential to contain historic archaeological resources. Based on the historic Sanborn insurance maps, the former locations of a 1900-1950 residence and outbuilding, and a 1950 restaurant occur within the USARC facility boundaries. The 99th RSC is performing an assessment to identify the archaeological potential. The findings of the assessment and any additional field investigations will be provided to your office for review and comment at a later date.

An architectural survey of the Brittin USARC was conducted on December 9, 2010 and the facility was evaluated for eligibility to the National Register of Historic Places (NRHP), interpreting the guidelines established in the national historic context, *Blueprints for the Citizen*

Mr. Bob Martin
Page 2

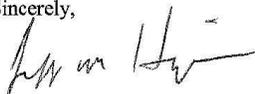
Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers prepared for the Department of Defense Legacy Resource Management Program (enclosed). The Brittin USARC appears to be architecturally significant at the national level as an example of the Sprawling Plan type developed by Reisner and Urbahn as part of a nationwide building campaign for the Army Reserves during the early Cold War. Although the facility appears to be architecturally significant, alterations to character-defining features (the building exterior and window alterations), as defined in the 2008 Historic Context, have diminished the overall integrity of the facility to such an extent that the Army has determined the Brittin USARC is not eligible for the NRHP. Please find enclosed the *Architectural Survey for the SFC Nelson V. Brittin United States Army Reserve Center, Pennsauken Township, Camden County, New Jersey FAC ID NJ001* for your review and concurrence.

At this time, in accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR 800, the 99th RSC wishes to formally initiate consultation with your office. The 99th RSC is aware that Native American and other cultural groups may have concerns related to cultural resources, so consultation will also be conducted with the following federally recognized tribes:

- Delaware Nation
- Delaware Tribe of Indians
- Stockbridge Munsee Community of Wisconsin

In addition, we would like to request you review the enclosed survey and concur with our determination that the Brittin USARC is not eligible for the NRHP under Criterion A, B, or C within 30 days from the date on this letter. I thank you in advance for your efforts, and request you direct your comments and questions to: Ms. Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609) 521-8047 Email: amanda.w.murphy@usar.army.mil.

Sincerely,



Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:
Site Vicinity Map
Topographic Map
Current Site Plan
Brittin USARC Reuse Plan
Blueprints for the Citizen Soldier
Architectural Survey of the SFC Nelson V. Brittin USARC



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Mr. Kerry Holton
President
Delaware Nation
Main Office Building 100
31064 State Hwy 281
Anadarko, OK 73005

Reference: Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in
Pennsauken Township, Camden County, New Jersey

President Holton,

In accordance with recommendations of the Base Realignment and Closure Act, the United States Army Reserve 99th Regional Support Command (RSC) is proposing closure, disposal, and reuse of the Sergeant First Class (SFC) Nelson V. Brittin US Army Reserve Center (Brittin USARC) in Camden County, New Jersey. The proposed transfer of Federal property to local reuse and development is an undertaking that has the potential to result in an adverse effect on historic resources. If this action is of interest to you, we would like to initiate consultation pursuant to the requirements of Section 106 of the National Historic Preservation Act.

The Brittin USARC complex, located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey, covers approximately 7.7 acres and contains five buildings and structures: the main administration building, consisting of an administrative/ classroom block and a drill hall, a detached organizational maintenance shop (OMS), a petroleum, oil, and lubricant (POL) storage building, a hazardous waste storage shed, and a vehicle wash area. The main building and OMS building were constructed in 1953; the other structures were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

Two previous archaeological studies were conducted on the USAR parcel: a survey for a utility line project in which no archaeological resources were identified on or adjacent to the Brittin USARC facility and a Phase IA study which was limited to pedestrian reconnaissance and archival research. Based on a Phase IA study, the USARC facility was considered to have the potential to contain historic archaeological resources and a Phase IB subsurface survey was recommended. The 99th RSC will be conducting an assessment of the recommendations and the present site conditions to confirm these findings and determine if field investigations are needed.

The 99th RSC completed an architectural evaluation of the facility in December 2010 and final revisions are currently being incorporated into the technical report. A copy of that document will be provided at your request.

Mr. Kerry Holton
Page 2

This letter is meant to determine your interest in participating in the Section 106 consultation process for this project. 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.

Your response is requested within 30 calendar days from the date on this letter. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047. We look forward to working cooperatively with you to make this important project successful for all parties involved.

Respectfully,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:
Figure 1: Site Vicinity Map
Figure 2: Topographic Map
Figure 3: Current Site Plan
Figure 4: Reuse Plan



**DEPARTMENT OF THE ARMY
THE HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000**

February 25, 2011

Mr. Jerry L. Douglas
Chief
Delaware Tribe of Indians, Oklahoma
170 N.E. Barbara
Bartlesville, OK 74003

Reference: Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in
Pennsauken Township, Camden County, New Jersey

Chief Douglas,

In accordance with recommendations of the Base Realignment and Closure Act, the United States Army Reserve 99th Regional Support Command (RSC) is proposing closure, disposal, and reuse of the Sergeant First Class (SFC) Nelson V. Brittin US Army Reserve Center (Brittin USARC) in Camden County, New Jersey. The proposed transfer of Federal property to local reuse and development is an undertaking that has the potential to result in an adverse effect on historic resources. If this action is of interest to you, we would like to initiate consultation pursuant to the requirements of Section 106 of the National Historic Preservation Act.

The Brittin USARC complex, located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey, covers approximately 7.7 acres and contains five buildings and structures: the main administration building, consisting of an administrative/ classroom block and a drill hall, a detached organizational maintenance shop (OMS), a petroleum, oil, and lubricant (POL) storage building, a hazardous waste storage shed, and a vehicle wash area. The main building and OMS building were constructed in 1953; the other structures were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

Two previous archaeological studies were conducted on the USAR parcel: a survey for a utility line project in which no archaeological resources were identified on or adjacent to the Brittin USARC facility and a Phase IA study which was limited to pedestrian reconnaissance and archival research. Based on a Phase IA study, the USARC facility was considered to have the potential to contain historic archaeological resources and a Phase IB subsurface survey was recommended. The 99th RSC will be conducting an assessment of the recommendations and the present site conditions to confirm these findings and determine if field investigations are needed.

The 99th RSC completed an architectural evaluation of the facility in December 2010 and final revisions are currently being incorporated into the technical report. A copy of that document will be provided at your request.

This letter is meant to determine your interest in participating in the Section 106 consultation process for this project. At this time, we respectfully request any information you can share

Mr. Jerry L. Douglas
Page 2

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.

Your response is requested within 30 calendar days from the date on this letter. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047. We look forward to working cooperatively with you to make this important project successful for all parties involved.

Respectfully,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:

- Figure 1: Site Vicinity Map
- Figure 2: Topographic Map
- Figure 3: Current Site Plan
- Figure 4: Reuse Plan



DEPARTMENT OF THE ARMY
THE ADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Ms. Kimberly Vele
President
Stockbridge Munsee Community of Wisconsin
N8476 Mo He Con Nuck Road
Bowler, WI 54416

Reference: Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in
Pennsauken Township, Camden County, New Jersey

President Vele,

In accordance with recommendations of the Base Realignment and Closure Act, the United States Army Reserve 99th Regional Support Command (RSC) is proposing closure, disposal, and reuse of the Sergeant First Class (SFC) Nelson V. Brittin US Army Reserve Center (Brittin USARC) in Camden County, New Jersey. The proposed transfer of Federal property to local reuse and development is an undertaking that has the potential to result in an adverse effect on historic resources. If this action is of interest to you, we would like to initiate consultation pursuant to the requirements of Section 106 of the National Historic Preservation Act.

The Brittin USARC complex, located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey, covers approximately 7.7 acres and contains five buildings and structures: the main administration building, consisting of an administrative/ classroom block and a drill hall, a detached organizational maintenance shop (OMS), a petroleum, oil, and lubricant (POL) storage building, a hazardous waste storage shed, and a vehicle wash area. The main building and OMS building were constructed in 1953; the other structures were constructed more recently. The remainder of the site is covered in pavement (parking) or landscaped areas.

Two previous archaeological studies were conducted on the USAR parcel: a survey for a utility line project in which no archaeological resources were identified on or adjacent to the Brittin USARC facility and a Phase IA study which was limited to pedestrian reconnaissance and archival research. Based on a Phase IA study, the USARC facility was considered to have the potential to contain historic archaeological resources and a Phase IB subsurface survey was recommended. The 99th RSC will be conducting an assessment of the recommendations and the present site conditions to confirm these findings and determine if field investigations are needed.

The 99th RSC completed an architectural evaluation of the facility in December 2010 and final revisions are currently being incorporated into the technical report. A copy of that document will be provided at your request.

This letter is meant to determine your interest in participating in the Section 106 consultation process for this project. At this time, we respectfully request any information you can share

Ms. Kimberly Vele
Page 2

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.

Your response is requested within 30 calendar days from the date on this letter. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047. We look forward to working cooperatively with you to make this important project successful for all parties involved.

Respectfully,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:
Figure 1: Site Vicinity Map
Figure 2: Topographic Map
Figure 3: Current Site Plan
Figure 4: Reuse Plan



HPO Project# 11-0812-1
HPO-D2011-D2011-94

State of New Jersey

MAIL CODE 501-04B

DEPARTMENT OF ENVIRONMENTAL PROTECTION

NATURAL & HISTORIC RESOURCES

HISTORIC PRESERVATION OFFICE

P.O. Box 420

Trenton, NJ 08625-0420

TEL. (609) 984-0176 FAX (609) 984-0578

CHRIS CHRISTIE
Governor

BOB MARTIN
Commissioner

KIM GUADAGNO
Lt. Governor

April 14, 2011

Ms. Amanda Murphy
99th RSC DPW
Environmental Division
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

Dear Ms Murphy:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published in the Federal Register on December 12, 2000 (65 FR 77725-77739) and amended on July 6, 2004 (69 FR 40553-40555), I am providing initial consultation comments on the following proposed undertaking:

**Camden County, Pennsauken Township
SFC Nelson V. Brittin United States Army Reserve Center
Closure, Disposal, and Reuse
HPO Project# 11-0812**

These comments were prepared in response to your submission of a cover letter and supporting maps and a copy of the following report, received by the Historic Preservation Office (HPO) on March 3, 2011:

Chasteen, Carrie, Susan L. Bupp, and Rachael E. Mangum. *Architectural Survey for the SFC Nelson V. Brittin United States Army Reserve Center, Pennsauken Township, Camden County, New Jersey FAC ID NJ001*. Chesterfield, MO: Parsons. Prepared for U.S. Army Reserve 99th Regional Support Command, Fort Dix, New Jersey and the United States Army Corps of Engineers, Mobile District, Mobile, AL.

800.4 Identification of Historic Properties

The survey report documented the intensive-level survey of the SFC Nelson V. Brittin United States Army Reserve Center (USARC). Based upon a review of the submitted documentation, the HPO concurs with the Army's determination that the

property is not eligible for listing in the New Jersey and National Registers of Historic Places.

The submitted cover letter states that based upon a prior Phase IA archaeological study, the Brittin USARC is considered to have some potential to contain historic archaeological resources and that the 99th Regional Support Command is currently performing an assessment to further evaluate the archaeological potential of the USARC property. The findings of the assessment and any field investigations will be provided to the HPO for review and comment at a later date. The HPO looks forward to receiving this additional documentation, which will be required to complete the identification of historic properties, pursuant to 800.4.

Thank you for providing the opportunity to review and comment on the potential for the above-referenced project to affect historic properties. Please do not hesitate to contact Jonathan Kinney of my staff at (609) 984-0141 with any questions regarding historic architecture or Vincent Maresca at (609) 633-2395 with any questions regarding archaeology. If additional consultation with the HPO is needed for this undertaking, please reference the HPO project number 11-0812 in any future calls, emails, or written correspondence in order to expedite our review and response.

Sincerely,



Daniel D. Saunders
Deputy State Historic
Preservation Officer



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

JUN 21 2011

Mr. Bob Martin
State Historic Preservation Officer
New Jersey Historic Preservation Office
Department of Environmental Protection
401 East State Street
PO Box 420
Trenton, NJ 08625-0420

Reference: Archaeological Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken Township, Camden County, New Jersey

Mr. Martin,

As indicated in our letter dated February 24, 2011 and as requested in your response in a letter dated April 14, 2011, the U.S. Army Reserve 99th Regional Support Command (RSC) has conducted an assessment to identify archaeological potential in the undeveloped area of the SFC Nelson Brittin United States Army Reserve Center (Brittin USARC) located at 3911 Federal Street in Pennsauken Township near Camden, New Jersey (Figures 1-3).

The Brittin USARC covers approximately 7.7 acres and contains five buildings and structures: the main administration building, consisting of an administrative/classroom block and a drill hall; a detached organizational maintenance shop; a petroleum, oil, and lubricant storage building; a hazardous waste storage shed; and a vehicle wash area. The main building and OMS were constructed in 1953; the other structures were built more recently. The remainder of the site is covered in pavement (parking: 3.85 acres) or landscaped areas (1.6 acres).

Based on the Phase IA study conducted in 2007, historic cartographic information indicates that this parcel remained relatively undeveloped until the 1950s (Figures 4 - 6); two small pre-1906 dwellings were constructed and occupied adjacent to the parcel on the southwest edge and an L-shaped one-story restaurant was established in the southeast corner of the parcel by 1950. Prior disturbance from construction of the USARC facility and nearby road improvements have severely impacted the potential for intact prehistoric resources and no areas with prehistoric archaeological resources potential were identified. However, a small portion of the USARC site (approximately one acre) was considered to have low to moderate potential to contain historic archaeological resources related to historic agricultural land use and the presence of a nearby historic African-American burial ground. The majority of the Brittin USARC site was considered to have low archeological resource potential.

The parcel was originally owned by the Rich family from 1857 to 1952. As indicated on the Sanborn Fire Insurance maps, only one building was constructed during this occupation (the small restaurant present by 1950); most likely the parcel was used as agricultural fields prior to the establishment of the restaurant. The African- American burial ground, known as the Johnson Cemetery, was established by 1857 on a triangular parcel south of what is now Federal Street (Figures 3-6). The cemetery was originally delineated by marble gate posts and cast or wrought iron fencing, now no longer extant. The Johnson Cemetery contains approximately 86 graves of both men and women with the earliest interment dated 1860 and the last interment dated 1919. The cemetery boundaries have remained consistent through time and the presence of additional graves outside the triangular parcel is unlikely.

Mr. Bob Martin
Page 2

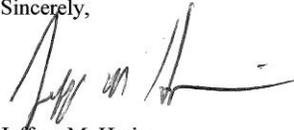
Given the types of prior land use (agricultural fields and small 1950s restaurant), it is unlikely that extensive archaeological deposits would remain. Few archaeological artifacts are likely to be associated with agricultural fields and any scattered artifacts would represent incidental debris lost during plowing. Intact architectural features such as piers or foundations would most likely have been razed prior to the construction of the Brittin USARC (no intact foundations were observed during a field visit in December 2010); scattered architectural debris from the restaurant could occur as a result of demolition activities. Archaeological materials associated with the 1950s restaurant would be minimal as systematic trash collection was in place during this time and commercial debris would have been disposed of offsite.

Based on the types of prior land use, intact or extensive subsurface archaeological deposits are unlikely to occur in the undeveloped portions of the Brittin USARC. Although scattered subsurface artifacts may occur, they would not provide significant information to address local research questions therefore lacking the density and diversity needed to consider any locations eligible for listing in the National Register of Historic Places (NRHP).

The Army has determined that no further archaeological investigations are required at the Brittin USARC and that the proposed undertaking will have no effect on archaeological resources that may be considered eligible for the NRHP.

The Army requests your concurrence on our determination of no effect within 30 days from the date on this letter. Please direct your comments and questions to Ms. Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609) 521-8047
Email: amanda.w.murphy@usar.army.mil.

Sincerely,



Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures

- Figure 1: Site Vicinity Map
- Figure 2: Topographic Map
- Figure 3: Current Site Plan
- Figure 4: 1906 Sanborn Map
- Figure 5: 1926 Sanborn Map
- Figure 6: 1950 Sanborn Map



HPO Project No. 11-0812-3 VM
HPO-H2011-164

State of New Jersey

MAIL CODE 501-04B
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NATURAL & HISTORIC RESOURCES
HISTORIC PRESERVATION OFFICE
PO Box 420
Trenton, NJ 08625-0420
TEL. (609) 984-0176 FAX (609) 984-0578

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

August 22, 2011

Ms. Amanda Murphy
99th RSC DPW
Environmental Division
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

Dear Ms. Murphy:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published in the *Federal Register* on December 12, 2000 (65 FR 77725-77739) and amended on July 6, 2004 (69 FR 40544-40555), I am providing consultation comments for the following proposed undertaking:

**Camden County, Pennsauken Township
SFC Nelson V. Brittin US Army Reserve Center
Phase IA Archaeological Survey
United States Department of the Army**

800.4 Identifying Historic Properties

The comments below are in response to the following archaeological survey report received at the Historic Preservation Office (HPO) on August 17, 2011:

Wieczorek, Scott and Hope E. Luhman
August 2007 *Phase IA Archaeological Survey, 77th Regional Readiness Command Facilities, 77th Army Reserve Installation Management, Volume I: New Jersey*. Prepared by The Louis Berger Group, Inc., Albany, New York.

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These comments are based on the above referenced report and apply only to the SFC Nelson V. Brittin US Army Reserve Center. Please consult with the HPO if consultation comments are requested for the additional facilities discussed in the report.

The above referenced report states that the SFC Nelson V. Brittin US Army Reserve Center site holds a low to moderate potential for archaeological deposits. Based on the lack of high archaeological potential and urbanized nature of the reserve center, the HPO concurs with the Department of Army's assessment that no additional archaeological survey is necessary for the SFC Nelson V. Brittin USARC.

Therefore, I concur with your finding that there are **no historic properties affected** within the area of potential effects. Consequently, pursuant to 36 CFR 800.4(d)(1), no further Section 106 consultation is required unless additional resources are discovered during project implementation pursuant to 36 CFR 800.13. **(NP)**

Additional Comments:

Thank you again for providing the opportunity to review and comment on the potential for the above-referenced undertaking to affect historic properties. Please reference the HPO project number 11-0812 in any future calls, emails, submission or written correspondence to help expedite your review and response. If you have any questions, please feel free to contact Vincent Maresca of my staff at (609) 633-2395 or vincent.maresca@dep.state.nj.us.

Sincerely,



Daniel D. Saunders
Deputy State Historic
Preservation Officer

A.3 USFWS Consultation

Appendix A.3 contains the following correspondence with USFWS associated with the preparation of the Environmental Assessment.

	<u>Date</u>
Standardized "No Effect Letter"	March 10, 2009
Letter to USFWS	Feb. 25, 2011



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New Jersey Field Office
927 North Main Street, Building D
Pleasantville, New Jersey 08232
Tel: 609-646-9310 Fax: 609-646-0352
<http://www.fws.gov/northeast/njfieldoffice>

March 10, 2009

To Whom It May Concern:

Section 7(a)(2) of the Endangered Species Act (ESA) requires Federal agencies to consult with the U.S. Fish and Wildlife Service (Service) to ensure that actions they fund, authorize, permit or otherwise carry out will not jeopardize the continued existence of any listed species or adversely modify designated critical habitats. Federal agencies must initiate consultation with the Service if a proposed action *may affect* one or more listed species. In addition, the Service provides review of non-Federal actions that *may affect* federally listed species or their habitats as technical assistance to help non-Federal project proponents ensure compliance with the ESA and with New Jersey land use regulations. Staffing constraints currently limit the Service's New Jersey Field Office to reviewing only those projects that *may affect* federally listed species. The *may affect* determination is made by the Federal action agency or non-Federal project proponent using the information and instructions on our web site.

<http://www.fws.gov/northeast/njfieldoffice/Endangered/consultation.html>

Federal agencies are not required to contact the Service if a proposed action will have *no effect* on listed species, or if no listed species are present in the action area. No further ESA consultation or coordination is necessary for projects where the Federal action agency or non-Federal project proponent has followed the procedures on our web site and determined that proposed project activities will have *no effect* on federally listed species. Service concurrence with a *no effect* determination is not required under the ESA and will not be provided by the New Jersey Field Office. In addition to this letter, the Federal action agency or non-Federal project proponent should retain in their paper files documentation from our web site at the time of their review, including the relevant portion(s) of the *Federally Listed and Candidate Species Occurrences in New Jersey by County and Municipality*. Note that under the ESA, a species list is valid for only 90 days; the Service recommends consulting our web site regularly during project planning and implementation for updated species lists and information.

Thank you for your cooperation. Please contact Wendy Walsh at (609) 383-3938, extension 48, if you have any questions or require further assistance regarding federally listed threatened or endangered species.

Sincerely,

J Eric Davis Jr.
Supervisor



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

February 25, 2011

Mr. J Eric Davis Jr.
Fish and Wildlife Service
New Jersey Field Office
927 North Main Street, Building D
Pleasantville, NJ 08232

Reference: National Environmental Policy Act Environmental Assessment for the Closure, Disposal, and Reuse of the SFC Nelson V. Brittin USARC in Pennsauken, NJ

Dear Mr. Davis Jr.:

The United States Army Reserve 99th Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the SFC Nelson V. Brittin US Army Reserve Center (Brittin USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

NEPA requires a Federal agency to provide the public and other stakeholders with an opportunity to participate in the process of analyzing Federal actions that could impact the natural and man-made environment. The purpose of this letter is to inform your agency of an opportunity to assist the Army in identifying potential impacts that may occur as a result of the proposed action and its alternatives. Your participation in this process is greatly appreciated.

The purpose and need of the closure, disposal, and reuse of the Brittin USARC is to meet the requirements of the Base Realignment and Closure Act. The Brittin USARC is located at 3911 Federal Street, Pennsauken, New Jersey. The site is 7.7 acres in size and contains two buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Three alternatives are being considered for the proposed action and all would occur at the current location of the Brittin USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Brittin USARC be closed, this is not a feasible alternative. Under the Caretaker Status Alternative (Alternative 2), the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

Mr. J Eric Davis Jr.
Page 2

The Army's Preferred Alternative (Alternative 3) involves the closure of the Brittin USARC and subsequent transfer of the property to the Pennsauken Township and Volunteers of America (VOA). The township would reuse 5+ acres of the existing facilities for Emergency Management Services, public works, and salt storage. VOA would reuse 2+ acres to provide permanent housing units for the homeless.

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

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

Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640 or by email at amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047.

Sincerely,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:
Figure 1: Site Vicinity Map
Figure 2: Topographic Map
Figure 3: Current Site Plan
Figure 4: Reuse Plan

A.4 Agency and Public Notices

Per requirements specified in 32 CFR Part 651.4, a 30-calendar-day review period (starting with the publication of the NOA) was established to provide all agencies, organizations, and individuals with the opportunity to comment on the EA and FNSI. A NOA was published in local and regional newspapers to inform the public that the EA and FNSI were available for review. The newspapers were:

- The Courier-Post
- The Philadelphia Inquirer.

The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and FNSI for review, listed where paper copies of the EA and FNSI could be reviewed, and advised the public that an electronic version of the EA and FNSI were available for download at the following Web site: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

The EA was available for public review and comment at the following libraries:

- Camden Free Public Library
- Camden County Library
- Pennsauken Free Public Library

APPENDIX B – AIR CONFORMITY APPLICABILITY ANALYSIS

Introduction

A General Air Conformity Applicability Analysis was conducted to determine if increases in air pollution from the construction project associated with the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the SFC Nelson V. Brittin United States Army Reserve Center, Pennsauken Township, Camden County, New Jersey would impact National Ambient Air Quality Standards (NAAQS). The project will occur within a US Environmental Protection Agency (USEPA) designated non-attainment area and is therefore subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.

The 1990 amendments to the Federal CAA, Section 176 required the USEPA to promulgate rules to ensure that federal actions that produce emissions of any criteria air pollutants for which an area is not in attainment conform to the appropriate SIP. These resulting rules, known together as the General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), require any federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the General Conformity Rule's requirements or positively determine that the action conforms to the provisions and objectives of the applicable State Implementation Plan (SIP). Any mitigation deemed necessary as a result of the conclusions reached in the conformity analysis would be implemented and integrated into the NJDEP SIP.

The General Conformity Rule requires an assessment of the potential magnitude of potential total emissions of non-attainment criteria pollutants, including their precursors, associated with a proposed federal action when determining conformity of that action. The rule does not apply to certain "exempt" actions or to actions where the total emissions of criteria pollutants are at or below specified *de minimis* levels. In addition, ongoing activities currently being conducted are exempt from the rule as long as there is no net increase in emissions above the specified *de minimis* levels. If the predicted emissions exceed the *de minimis* levels, a formal air conformity determination is necessary. If the *de minimis* levels are not exceeded, and if the predicted emissions do not exceed 10 percent of a non-attainment area's total emission budget for a given pollutant, a record of non-applicability must be prepared.

For purposes of determining a project's emissions, emissions are those directly associated with project activities at the time and location of the project. For the Proposed Action, emissions include those from routine operational activities and operation of permitted emission sources, as well as actual construction activities, construction vehicles and equipment, and any ancillary emissions sources.

Project Description

The site consists of 7.7 acres of developed land with the following structures:

- 25,100-square-foot main building (including the drill hall)
- 7,600-square-foot organizational maintenance shop (OMS)
- 360-square-foot POL storage shed

-
- hazardous materials storage shed, and
 - vehicle wash area (currently unused).

The main building and OMS building were constructed in 1953 and are on concrete foundations with concrete block walls and foam/stucco-type exteriors. The main building contains office space, classrooms, a kitchen area, storage rooms, a former indoor firing range, a boiler room, an arms vault, and a drill hall. The main building is a T-shaped multiple-level structure, with a two-story drill hall connected by a one-story enclosed corridor (US Army Corps of Engineers [USACE] 2007).

The OMS is a single story building with four vehicle service bays. The OMS building is used for limited maintenance of military vehicles and consists of an active lube pit, caged storage, a boiler room, and several offices.

The POL Storage Shed was constructed in 1990 and is located at the northwestern end of the Property. This single story storage shed is used for storage of fog oil and fuel cans. It is constructed of metal siding with a concrete floor.

The hazardous materials storage shed is a single floored, relocatable shed that is located southwest of the OMS building.

The vehicle wash rack is located southwest of the OMS building. The wash rack is constructed of concrete and drains through two inlets into an oil/water separator.

Current Ambient Air Quality Considerations

Emissions Evaluation

The primary emission sources for this project will be those associated with construction activities. Cumulative air emissions were calculated for various types of diesel-engine construction vehicles and related equipment. The project qualifies for the 40 CFR 93.153 (c)(1) criteria because the replacement activity emissions are clearly *de minimis* and below applicable threshold levels. The construction activity associated with this modification will result in a temporary increase in air emissions as demonstrated in the calculations below. The calculations are included solely to demonstrate the project's negligible impact. A Regional Significance Review was not conducted as part of this evaluation due to the exemption clauses stated above.

Emission Factors

Emission factors (EF) were obtained from a variety of resources. These include MOBILE6, AP-42, NONROAD 2005, and the South Coast Air Quality Management District Air Quality Handbook. Where feasible, the most conservative EFs were incorporated.

Construction Emissions

Activity	Annual Emissions (TPY)		
	CO	PM _{2.5}	Ozone
New Building Construction	3.28	0.11	8.73
Building Renovation	0.05	0.01	0.06

*Assumes 40,000 ft² of demolition, 87,120 ft² of construction, and 7,600 ft² renovation

†Represent 2011 Project Year Only

Surface Disturbance

Activity	Annual Emissions (TPY)		
	CO	PM _{2.5}	Ozone
Site Preparation	0.0	0.33	0.01
Asphalt Paving	0.21	0.00	0.04
Concrete Paving	0.08	0.00	0.19

*Assumes a 2 acre parcel @ 21,780 ft² of asphalt and 10,890 ft² of concrete

†Represent 2011 Project Year Only

Vehicle/Equipment Emissions

Activity	Annual Emissions (TPY)	
	CO	Ozone
Commuter Traffic	0.16	0.004

*Assumes a net loss of 1 vehicle @ 15 miles/day.

Non-Road/Non-Mobile Source Emissions

Activity	Annual Emissions (TPY)	
	CO	Ozone
Various Equipment Sources	0.49	0.05

Heating Source Emissions

Activity	Annual Emissions (TPY)
	Ozone
Various Equipment Sources	1.29

Painting/Solvent Emissions-Doug

Activity	Annual Emissions (TPY)
	Ozone
Paint and Solvents	0.30

Summary of Emissions

	Annual Emissions (TPY)		
	CO	PM_{2.5}	Ozone
All Activities Combined	4.27	0.45	10.71
2011 Project Year	3.20	0.38	8.03

ATTACHMENT 1 – RECORD OF NON-APPLICABILITY

Project Name: Closure, Disposal, and Reuse of Brittin US Army Reserve Center

Project Point of Contact:

Jeffrey M Hrzic
Chief, Environmental Division
99th Regional Support Command

Project Dates: Approximately September 1st, 2011 through May 31st, 2012

General Conformity under the Clean Air Act, Section 176 has been evaluated for the action described above according to the provisions set forth in 40 CFR 93, Subpart B. The General Conformity Rule applies to federal actions occurring in regions designated as being non-attainment for the National Ambient Air Quality Standards (NAAQS) or attainment areas subject to maintenance plans (maintenance area). *De minimis* threshold levels for applicable NAAQS constituents have been established for federal actions with the potential to have significant air quality impacts. Should a project or related action located in a non-attainment or maintenance area exceed *de minimis* levels, a general conformity analysis would be required.

The Brittin USARC is located in Camden County, New Jersey, which is designated as a non attainment area for 8-Hour Ozone and PM_{2.5} (annual and 24-hour). As such, ozone precursor pollutants nitrogen oxides (NO_x) and volatile organic compounds (VOC) also apply. Camden County is also a maintenance area for carbon monoxide emissions. A General Conformity Determination is not required because total maximum annual emissions from this project have been estimated below the *de minimis* threshold levels. Calculated emissions and their relation to *de minimis* levels established in 40 CFR 93.153 (b) are presented in the table below.

NAAQS Criteria Pollutant	Applicable Threshold Level (40 CFR 93.153 (b))	Estimated Emission Results (Reported as Tons/Year)-2011	Above/Below Threshold Level
CO	100	3.20	Below
Ozone	50	8.03	Below
PM _{2.5}	100	0.38	Below

Camden County is in attainment for all other NAAQS criteria pollutants and therefore is not subject to air conformity review.

Supporting documentation and emission estimates can be found in Section 4.4 and Appendix B, respectively, of the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the SFC Nelson V. Brittin United States Army Reserve Center, Pennsauken Township, Camden County, New Jersey.

Jeffrey M Hrzic
Chief, Environmental Division
SFC Nelson V. Brittin US Army Reserve Center

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APPENDIX C - EIFS Report

The EIFS model provides a systematic method for evaluating the regional socioeconomic effects of government actions, particularly military actions. Using employment and income multipliers developed with a comprehensive regional/local database combined with economic export base techniques, the EIFS model estimates the regional economic impacts in terms of changes in employment generated, changes in population, and expenditures directly and indirectly resulting from project construction. The EIFS model evaluates economic impacts in terms of regional change in business volume, employment and personal income, and expenditures for local and regional services, materials, and supplies. Although the EIFS model does not provide an exact measure of actual dollar amounts, it does offer an accurate relative comparison of alternatives.

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

The basis of the EIFS analytical capabilities is the calculation of multipliers used to estimate the impacts resulting from BRAC-related changes in local expenditures or employment. The forecast inputs for the EIFS are as follows. It is assumed 60 percent of construction costs reflect materials and supplies; 30 percent for labor, and 10 percent for profit/overhead. The actual construction cost for changes in local expenditures is 60 percent of total project construction divided by the length of project. The change in employment is determined by finding the 30 percent labor number and then dividing by the Bureau of Labor Statistics Wages by area and occupation for construction and extraction workers in the Camden, New Jersey Metropolitan Area. The following are the EIFS output data for construction and the Rational Threshold Value (RTV) for the Region of Influence (ROI) of Alternatives 3.

EIFS REPORT

PROJECT NAME

BRAC EA - Brittin USARC - Alternative 3

STUDY AREA

34005 Burlington, NJ 34007 Camden, NJ 34015 Gloucester, NJ

FORECAST INPUT

Change In Local Expenditures	\$2,100,000
Change In Civilian Employment	20
Average Income of Affected Civilian	\$52,850
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Militart Living On-post	0

FORECAST OUTPUT

Employment Multiplier	4.31	
Income Multiplier	4.31	
Sales Volume - Direct	\$2,462,589	
Sales Volume - Induced	\$8,151,170	
Sales Volume - Total	\$10,613,760	0.02%
Income - Direct	\$1,287,817	
Income - Induced)	\$1,166,591	
Income - Total(place of work)	\$2,454,408	0.01%
Employment - Direct	28	
Employment - Induced	27	
Employment - Total	55	0.01%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	12.36 %	11.06 %	2.89 %	1.64 %
Negative RTV	-4.85 %	-4.17 %	-3.49 %	-0.71 %

APPENDIX D - LEGAL AND REGULATORY FRAMEWORK FOR BRAC DISPOSAL AND REUSE PROCESS

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the SFC Nelson V. Brittin USARC in Pennsauken Township, Camden County, New Jersey. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission made the following recommendations concerning the Brittin USARC:

Close the Nelson Brittin Army Reserve Center in Camden, NJ and relocate units to a new consolidated Armed Forces Reserve Center in Camden, NJ, if the Army can acquire suitable land for the construction of the new facilities. The New AFRC shall have the capability to accommodate units from the New Jersey ARNG Armory, Burlington, if the state decides to relocate those units.

To implement these recommendations, the Army proposes to close the Brittin USARC.

The law that governs real property disposal is the Federal Property and Administrative Services Act of 1949 (40 U.S.C., Sections 471 and following, as amended). This law is implemented by the Federal Property Management Regulations at Title 41 CFR Subpart 101-47. The disposal process is also governed by 32 CFR Part 174 (Revitalizing Base Closure Communities) and 32 CFR Part 175 (Revitalizing Base Closure Communities—Base Closure Community Assistance), regulations issued by DoD to implement the BRAC law, and matters known as the Pryor Amendment and the President's Program to Revitalize Base Closure Communities.

Relevant Statutes and Executive Orders

A decision on how to proceed with the Proposed Action rests on numerous factors such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations, the Army is guided by relevant statutes (and their implementing regulations) and Executive Orders (EO) that establish standards and provide guidance on environmental and natural resources management and planning. These include the Clean Air Act, Clean Water Act, Noise Control Act, Endangered Species Act, National Historic Preservation Act, Archaeological Resources Protection Act, Resource Conservation and Recovery Act, and Toxic Substances Control Act. EOs bearing on the Proposed Action includes:

EO 11988 (Floodplain Management)

EO 11990 (Protection of Wetlands)

EO 12088 (Federal Compliance with Pollution Control Standards)

EO 12580 (Superfund Implementation)

-
- EO 12873 (Federal Acquisition, Recycling and Waste Prevention)
 - EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations)
 - EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks)
 - EO 13175 (Consultation and Coordination with Indian Tribal Governments)
 - EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds)
 - EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management)

These authorities are addressed in various sections throughout this EA when relevant to particular environmental resources and conditions. The full texts of the laws, regulations, and EOs are available on the Defense Environmental Network & Information Exchange website at <http://www.denix.osd.mil>.

Other Reuse Regulations and Guidance

DoD's Office of Economic Adjustment published its Community Guide to Base Reuse in May 1995. The guide describes the base closure and reuse processes that have been designed to help with local economic recovery and summarizes the many assistance programs administered by DoD and other agencies. DoD published its DoD Base Reuse Implementation Manual to serve as a handbook for the successful execution of reuse plans. DoD and the US Department of Housing and Urban Development have published guidance (32 CFR Part 175) required by Title XXIX of the National Defense Authorization Act for Fiscal Year 1994. The guidance establishes policy and procedures, assigns responsibilities, and delegates authority to implement the President's Program to Revitalize Base Closure Communities (July 2, 1993), as endorsed through Congressional enactment of the Pryor Amendment.