ENVIRONMENTAL ASSESSMENT

CONSTRUCTION OF AN ARMED FORCES RESERVE CENTER AND IMPLEMENTATION OF BRAC 05 REALIGNMENT ACTIONS IN CAMDEN, NEW JERSEY

May 2010

prepared for

99th Regional Support Command

prepared by

U.S. Army Corps of Engineers

Mobile District

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CONSTRUCTION OF AN ARMED FORCES RESERVE CENTER AND IMPLEMENTATION OF BRAC 05 REALIGNMENT ACTIONS IN CAMDEN, NJ

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ENVIRONMENTAL ASSESSMENT

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

TITLE OF PROPOSED ACTION: Environmental Assessment for Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Actions in Camden, New Jersey

AFFECTED JURISDICTIONS: Camden County, New Jersey

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ABSTRACT: On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended that certain realignment actions occur in Camden, 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's recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

To implement the BRAC Commission's recommendations, the U.S. Army (Army) proposes to acquire sufficient and suitable land in Camden County, NJ and to construct the necessary facilities to support the changes in force structure and the consolidation of reserve units. The Army has determined that locating the new facilities in Camden County meets the intent of the BRAC Commission's recommendation to locate the facilities in Camden, NJ. This Environmental Assessment (EA) analyzes and documents environmental effects associated with the Army's proposed actions in Camden County, NJ.

None of the predicted effects of the Proposed Action would result in significant impacts to the quality of the human or biological environment in Camden County, NJ under the Alternative 1 or Alternative 2 sites. Potential significant impacts to surface waters and soils could result from implementing the Proposed Action at the Preferred Alternative site. However, by implementing appropriate mitigation measures would reduce the potential impacts to levels of no significant impact. If soil testing conducted by the Army confirms the presumed presence of acid producing soils on the Preferred Alternative site,

implementing soil mitigation measures as stipulated in the draft Technical Manual for the Flood Hazard Area Control Act Rules N.J.A.C. 7:13 (NJDEP, 2008e) and obtaining the necessary permits from the NJDEP under the Flood Hazard Area Control Act Rules N.J.A.C. 7:13 would prevent or minimize the problem of water pollution and soil contamination that may otherwise be caused by exposure of acid producing soils to the atmosphere during construction activities. If soil testing indicates that no acid producing soils are present, there would be no significant impact to surface waters or soils. Because employing soil mitigation measures, if necessary, would reduce impacts to surface waters and soils on the Preferred Alternative site to levels of no significant impact, and no other predicted effects of the Proposed Action would result in significant impacts at any of the alternative sites, preparation of an Environmental Impact Statement is not required and a Finding of No Significant Impact (FNSI) will be published in accordance with the National Environmental Policy Act (NEPA).

REVIEW PERIOD: Interested parties are invited to review and comment on the EA and Draft FNSI during the 30-day comment period, June 11, 2010 through July 10, 2010. The EA and Draft FNSI can be accessed on the World Wide Web at: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm

Copies of the EA and draft FNSI can also be viewed at the following local libraries:

Marie Fleche Memorial Library
49 S White Horse Pike
Berlin, NJ 08009

Pennsauken Free Public Library
5605 Crescent Blvd.,
Pennsauken, NJ 08110

Library Co. of Burlington
23 West Union Street
Burlington, NJ 08016

Winslow Township Branch Library
131 S Route 73
Braddock, NJ 08037

Blackwood Rotary Library
Gloucester Township Branch
15 S. Black Horse Pike
Blackwood, NJ 08012

Comments on the EA and Draft FNSI should be submitted during the 30-day public comment period via mail, fax, or electronic mail to:

Laura Dell'Olio,
Environmental /NEPA Specialist,
99th RSC, DPW ENV
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Camden County

Personally appeared Sandy Lammel

Of the **Courier-Post,** a newspaper printed in Cherry Hill, New Jersey and published in Cherry Hill, in said County and State, and of general circulation in said county, who being duly sworn, deposeth and saith that the advertisement of which the annexed is a true copy, has been published in the said newspaper 2 times, once in each issue as follows:

6/11/10, 6/12/10

A.D. **2010**

Sandy Lammel

Sworn and subscribed before me, this **14** day of **June, 2010**

Notary Public of New Jersey

Leslie J Emma
Notary Public, New Jersey
My Commission Expires 9-22-14

PUBLIC NOTICE OF AVAILABILITY
ENVIRONMENTAL ASSESSMENT AND DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR THE CONSTRUCTION OF AN ARMED FORCES RESERVE CENTER AND IMPLEMENTATION OF BRAC 2005 REALIGNMENT ACTIONS IN CAMDEN, NJ

Pursuant to the Council on Environmental Quality regulations for implementing the procedural provisions of the National Environmental Policy Act (40 CFR 1500) and 32 CFR 651 Environmental Analysis of Army Actions, the Army conducted an Environmental Assessment (EA) of the potential environmental and socioeconomic effects associated with implementing the Defense Base Closure and Realignment (BRAC) Commission's recommendations for Camden, NJ. To implement this recommendation, the Army proposes to acquire sufficient and suitable land and to construct a new Armed Forces Reserve Center (AFRC) and related facilities in Camden County, NJ to support the BRAC directed changes in force structure. The Army has determined that locating the new facilities in Camden County meets the intent of the BRAC Commission's recommendation to locate the facilities in Camden, NJ. The EA evaluated the potential environmental impacts associated with the acquisition of land, any demolition of structures required on that land, and the construction and operation of a new AFRC and support facilities.

The proposed AFRC would provide an approximately 53,291 square foot (SF), 300-member training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for six Army Reserve units and one NJ Army National Guard unit. Associated support facilities include an approximately 6,933 SF Organizational Maintenance Shop, and an approximately 1,217 SF unheated storage building. In addition, there would be approximately 2.25 acres of paved areas including 1.05 acres of privately-owned vehicle parking areas and access roads and 1.20 acres of military equipment parking areas for approximately 61 military vehicles and 40 trailers.

Three reasonable alternative sites were identified and evaluated in addition to the No Action Alternative: acquisition of an approximately 11-acre parcel of property located at 389 Cross Keys Road, Gloucester Township, Camden County, NJ; the acquisition of approximately 10 acres of property at 320 Erial Road, Sicklerville (Winslow Township, Camden County), NJ; and the acquisition of approximately 12 acres of property located at 295 Woodbury-Turnersville Road in the Lakeland area of Gloucester Township, NJ. The site in the Lakeland area of Gloucester Township is the Army's Preferred Alternative.

The EA and Draft Finding of No Significant Impact (FNSI) will undergo a 30-day public comment period, from June 11, 2010 through July 10, 2010. This is in accordance with requirements specified in 32 CFR Part 651.14 Environmental Analysis of Army Actions. During this period the public may submit comments on the EA and the Draft FNSI. The EA and Draft FNSI can be accessed on the World Wide Web at: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. Printed copies of the EA and Draft FNSI can also be viewed at the following libraries: Blackwood Rotary Library, Gloucester Township Branch, 15 S. Black Horse Pike, Blackwood, NJ 08012; South County Regional Branch Library, 35 Coopers Folly Road, Atco, NJ 08004; Marie Fleche Memorial Library, 49 S White Horse Pike, Berlin, NJ 08009; Pennsauken Free Public Library, 5605 Crescent Blvd, Pennsauken, NJ 08110; and Library Co. of Burlington, 23 West Union Street, Burlington, NJ 08016; and.

Comments on the EA and Draft FNSI should be submitted during the 30-day public comment period via mail, fax, or electronic mail to: Laura Dell'Olio, Environmental /NEPA Specialist, 99th RSC, DPW ENV, 5231 South Scott Plaza, Fort Dix, NJ 08640, fax: (609) 562-7983, email: laura.dellolio@usar.army.mil.

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

On September 8, 2005, the Base Realignment and Closure (BRAC) Commission recommended that certain realignment actions occur in Camden, NJ. 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's recommendations must now be implemented as provided for in the Defense Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The following are the BRAC Commission's recommendations for Camden, NJ (BRAC Commission, 2005)[1]:

- 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 *(sic)* AFRC shall have the capability to accommodate units from the New Jersey ARNG [Army National Guard] Armory, Burlington, if the state decides to relocate those units.

The BRAC Commission's recommendations considered the Secretary of Defense's justifications for recommended realignment actions in Camden, NJ. The Secretary's justifications, as quoted, are contained in Appendix A.

To implement this recommendation, the U.S. Army (Army) proposes to acquire sufficient and suitable land and to construct a new Armed Forces Reserve Center (AFRC) and related facilities in Camden County, NJ to support the BRAC-directed changes in force structure. The Army has determined that locating the new facilities in Camden County meets the intent of the BRAC Commission's recommendation to locate the facilities in Camden, NJ.

During the initial site selection process in 2008 the Army identified two sites in Camden County (Alternative 1 – Cross Keys Road and Alternative 2 – Erial Road) that were considered to be reasonable alternatives for implementing the Proposed Action, and further identified the Cross Keys Road site as the

[1] Although the BRAC language indicates that the Nelson Brittin Army Reserve Center is located in Camden, NJ, it is actually located in Pennsauken, NJ.

preferred alternative site. The two alternative sites, as well as the No Action Alternative, were analyzed in an Environmental Assessment (EA) by the Army (USACE, 2009a). The EA was released for public review during a 30-day comment period beginning July 2, 2009. During the initial 30-day comment period the Army received requests from the Mayor of Gloucester Township and other citizens to extend the comment period by 30 days to allow the public adequate time to review and provide comments on the document. The Mayor and others also requested that a public meeting on the project be held in Gloucester Township. The Army granted a 30-day extension of the comment period until August 30, 2009 and the Army held a public meeting on the project in Gloucester Township on August 17, 2009.

During the extended 60-day public comment period a total of 47 sets of written comments were received from interested parties. In addition, a number of comments were made during the public meeting held on August 17, 2009. A number of topics were addressed in the comments. The topics of most concern dealt with potential impacts on residential property values and other socioeconomic impacts, removing a commercial property from a taxable status, visual impacts on neighboring residences, noise, traffic concerns, stormwater runoff and impacts to ground water, wildlife impacts, and concerns for impacts to children. In response to the public comments and the Mayor's concern about removing a commercial property from a taxable status, the Army granted Camden County the opportunity to identify additional sites for the Army to consider as alternatives for implementing the Proposed Action. Camden County offered three additional sites for the Army to consider. The Army convened a Site Survey Team and visited the sites on December 3, 2009 (USACE, 2009b). Upon review of the sites, the Army identified one site in the Lakeland area of Gloucester Township, NJ to be a reasonable alternative for implementing the Proposed Action. The Army has also identified this site as the preferred alternative for implementing the Proposed Action.

This EA analyzes the potential environmental impacts associated with the acquisition of land, any demolition of structures required on that land, and the construction and operation of the new AFRC. In addition to the original two alternative sites, this EA also analyzes the impacts of implementing the Proposed Action on the Preferred Alternative – Lakeland site.

The BRAC law exempts consideration of the need to consider alternative military installations in preparing environmental documentation pursuant to the National Environmental Policy Act (NEPA). However, an appropriate level of NEPA analysis and documentation is required to analyze how the BRAC actions will be implemented. Table ES-1 lists major environmental statutes, regulations, and Executive Orders (EO) applicable to federal projects.

Table ES-1. Major Environmental Statutes, Regulations, and Executive Orders Applicable to Federal Projects

Environmental Resources	Statute, Regulation, or Executive Order
Air	Clean Air Act (CAA) of 1970 (PL 95-95), as amended in 1977 and 1990 (PL 91-604); U.S. Environmental Protection Agency (U.S. EPA), Subchapter C-Air Programs (40 CFR 52-99)
Noise	Noise Control Act of 1972 (PL 92-574) and Amendments of 1978 (PL 95-609); U.S. EPA, Subchapter G-Noise Abatement Programs (40 CFR 201-211)
Water	Federal Water Pollution Control Act (FWPCA) of 1972 (PL 92-500) and Amendments; Clean Water Act (CWA) of 1977 (PL 95-217); U.S. EPA, Subchapter D-Water Programs (40 CFR 100-145); Water Quality Act of 1987 (PL 100-4); U.S. EPA, Subchapter N-Effluent Guidelines and Standards (40 CFR 401-471); Safe Drinking Water Act (SDWA) of 1972 (PL 95-923) and Amendments of 1986 (PL 99-339); U.S. EPA, National Drinking Water Regulations and Underground Injection Control Program (40 CFR 141-149); Energy Independence and Security Act (EISA) Section 438 (Title 42, USC, Section 17094)
Biological Resources	Migratory Bird Treaty Act of 1918; Fish and Wildlife Coordination Act of 1958 (PL 85-654); Sikes Act of 1960 (PL 86-97) and Amendments of 1986 (PL 99-561) and 1997 (PL 105-85 Title XXIX); Endangered Species Act of 1973 (PL 93-205) and Amendments of 1988 (PL 100-478); Fish and Wildlife Conservation Act of 1980 (PL 96-366); Lacey Act Amendments of 1981 (PL 97-79); Responsibilities of Federal Agencies to Protect Migratory Birds (EO 13186)
Wetlands and Floodplains	Section 401 and 404 of the Federal Water Pollution Control Act of 1972 (PL 92-500); U.S. EPA, Subchapter D-Water Programs 40 CFR 100-149 (105 ref); Floodplain Management-1977 (EO 11988); Protection of Wetlands-1977 (EO 11990); Emergency Wetlands Resources Act of 1986 (PL 99-645); North American Wetlands Conservation Act of 1989 (PL 101-233)
Cultural Resources	NHPA (16 USC 470 et seq.) (PL 89-865) and Amendments of 1980 (PL 96-515) and 1992 (PL 102-575); Protection and Enhancement of the Cultural Environment-1971 (EO 11593); Indian Sacred Sites-1966 (EO 13007); American Indian Religious Freedom Act (AIRFA) of 1978 (PL 94-341); Antiquities Act of 1906; Archaeological Resources Protection Act (ARPA) of 1979 (PL 96-95); Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (PL 101-601); Protection of Historic and Cultural Properties (36 CFR 800)
Solid/Hazardous Materials and Waste	Resource Conservation and Recovery Act (RCRA) of 1976 (PL 94-5800), as Amended by PL 100-582; U.S. EPA, subchapter I-Solid Wastes (40 CFR 240-280); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 (42 USC 9601) (PL 96-510); Toxic Substances Control Act (TSCA) (PL 94-496); U.S. EPA, Subchapter R-Toxic Substances Control Act (40 CFR 702-799); Federal Insecticide, Fungicide, and Rodenticide Control Act (40 CFR 162-180); Emergency Planning and Community Right-to-Know Act (40 CFR 355, 370, and 372); Federal Compliance with Pollution Control Standards-1978 (EO 12088), Superfund Implementation (EO 12580); Strengthening Federal Environmental, Energy, and Transportation Management (EO 13423)
Health and Safety	Occupational Health and Safety Act of 1970 (29 CFR 1910 and 29 CFR 1926)
Environmental Justice	Federal Action to Address Environmental Justice in Minority Populations and

Environmental Resources	Statute, Regulation, or Executive Order
	Low-Income Populations (EO 12898); Protection of Children from Environmental Health Risks and Safety Risks (EO 13045)

ES.2 BACKGROUND AND SETTING

Camden County is located in southwestern New Jersey. Adjacent counties include Gloucester to the southwest, Atlantic to the southeast, and Burlington to the northeast.

ES.3 PROPOSED ACTION

The Proposed Action is to acquire sufficient and suitable land and construct a new AFRC and associated support facilities in Camden County, NJ to support six Army Reserve units and one New Jersey Army National Guard (NJARNG) unit relocating from the local area (Camden County and Burlington County, NJ).

***Facilities* -** The proposed AFRC would provide a training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for six Army Reserve units and one NJARNG unit. Associated support facilities include an Organizational Maintenance Shop (OMS), and an unheated storage building. In addition, there would be approximately 2.25 acres of paved areas including 1.20 acres of military equipment parking (MEP) areas and 1.05 acres of privately-owned vehicle (POV) parking areas and access roads.

***Personnel* –** Implementing the BRAC Commission's recommendations for Camden, NJ would result in the total assignment of approximately 364 personnel to the new AFRC, 347 of whom are reservists/part-time soldiers and 17 of whom are full-time personnel. Each unit will be drilling on one of three weekends each month, meaning that not all personnel will be using the facilities on the same weekend. The maximum number of personnel using the facilities on a drill weekend will be 184. Of these personnel none would be coming from outside of the local region.

***Equipment* –** The relocation and realignment of reserve units to the proposed AFRC would also bring associated unit vehicles, equipment, and materials. The total number of vehicles that would relocate to the AFRC is projected to be approximately 101, including 61 wheeled vehicles, 40 trailers, and 0 tracked vehicles.

ES.4 REALIGNMENT PROCESS

The timeline for implementing the action in Camden, NJ began in late 2005 with Congressional and Presidential approval of the BRAC law followed by the initiation of this NEPA process and related planning activities in Camden, NJ. Under the BRAC law, the Army must initiate all realignments not later than September 15, 2007, and complete all realignments not later than September 15, 2011.[2] With the additional time needed to evaluate the potential impacts of implementing the Proposed Action on the Preferred Alternative – Lakeland site, construction of the new AFRC facilities will not be completed until after the mandated realignment date of September 15, 2011. However, to meet the BRAC statute the Army will relocate the full-time employees to temporary trailer facilities on the site that is selected for implementing the Proposed Action prior to September 15, 2011. Consistent with Section II(b)(7) of Appendix B of 32 CFR 651, during the period after September 15, 2011 until the facilities are completed early in 2012, the reservists and their military equipment would temporarily relocate to available spaces on nearby Fort Dix. Once construction of the new AFRC facilities is completed in Camden County, the reservists, their military equipment, and the full-time employees would relocate to the new facilities.

This BRAC EA examines the environmental impacts from efforts that will be implemented during the BRAC implementation window to include the acquisition of land, any necessary demolition of structures on that land, the construction of the proposed new facilities, and the operation of those facilities.

ES.5 ALTERNATIVES

No Action Alternative

CEQ regulations require the No Action alternative to be included in an EA, for it serves as the baseline against which the impacts of the Proposed Action and alternatives can be evaluated. Accordingly, the No Action Alternative is evaluated in this EA.

Under the No Action Alternative the Proposed Action for Camden, NJ would not be implemented and the Army Reserve units as well as the NJARNG unit would continue to train at and operate from their current locations with current facilities which are outdated, inadequate, and inefficient. Routine replacement or

[2] Section 2904(a), Public Law 101-510, as amended, provides that the Army must "… initiate all closures and realignments no later than two years after the date on which the President transmits a report [by the BRAC Commission] to the Congress … containing the recommendations for such closures or realignments; and … complete all such closures and realignments no later than the end of the six year period beginning on the date on which the President transmits the report …" The President took the specified action on September 15, 2005.

renovation actions could occur through normal military maintenance and construction procedures as circumstances independently warrant.

Alternative 1 – Cross Keys Road

One location for the AFRC and its supporting facilities is located at 389 Cross Keys Road, Gloucester Township Camden County, NJ. The site consists of approximately 11 acres of vacant agricultural land which has been used in the past for crops and livestock. The property is currently zoned as commercial. The site meets the acreage requirements for the proposed project and can accommodate the necessary anti terrorism/force protection (AT/FP) set back requirements. The site also provides good exposure to the public, which is beneficial for recruiting purposes. The site was cleared and graded in 2007 with only a few remaining mature trees that may need to be cleared; therefore, relatively little site preparation is required other than the demolition of one standing structure on the property. The structure is a small residence on the southeastern portion of the property that is occupied by the former owner of the property. He has an understanding with the current owner that he will relocate once the property is sold. This house will need to be demolished and is likely to contain lead based paint and asbestos.

The site has easy access off of Cross Keys Road which is slated to be widened from a 2-lane to a 4-lane thorough fare at some point in the future. Immediate access to utilities is available along Cross Keys Road except for sewer which is located approximately 300 feet from the property line. There is also a 20-foot wide by 500-foot long easement to AT&T Co. of New Jersey that transverses the property in an east-west direction for an underground telephone line that formerly served a nearby Army Nike Installation. The line was abandoned when the Nike site was closed in the late 1960's, but AT&T has never extinguished the easement. The section of the old easement that runs through an adjacent residential area has been extinguished.

This site is identified as a reasonable alternative site for the project, and is fully evaluated in this EA.

Alternative 2 – Erial Road

This site is located at 320 Erial Road, Sicklerville (Winslow Township, Camden County), approximately 2.5 miles from the Atlantic City expressway south of Camden, but still within Camden County. The property consists of a total of approximately 34 acres of farm land. The site is flat and would not require extensive site preparation and has easy access to Erial Road. The site also provides good exposure to the public, which is beneficial for recruiting purposes. There are no buildings on the site, so no demolition is required and it is zoned as commercial, mixed use.

The owner of the property is willing to subdivide it, and if this alternative is selected, the Army would purchase approximately 10 acres of the 34 acre parcel in order to meet the necessary AT/FP set back distances. The wetland areas associated with an unnamed tributary to the Great Egg Harbor River along the northeast portion of the parcel and the easement for the overhead electrical transmission line along the eastern portion of the parcel would not be included in the 10 acres that the Army would purchase. The Army would also include only as much street frontage as necessary in the purchase to facilitate proper ingress and egress of POVs and military equipment.

Access to all utilities, except for sanitary sewer, is available at the site. A constraint on the site is that there is not sufficient sanitary sewer capacity at the site and there is a sewer moratorium in this area of Winslow Township. However, the Township has submitted an application to lift the moratorium (Gallagher, 2010).

This site is identified as a reasonable alternative site for the project, and is fully evaluated in this EA.

Preferred Alternative – Lakeland

This site, also known as the 4-H County Fairgrounds, is located at 295 Woodbury-Turnersville Road in the Lakeland area of Gloucester Township, NJ. The property consists of approximately 12 acres and can adequately accommodate the necessary AT/FP set back distances. The site is relatively flat and would not require extensive site preparation and has easy access to Woodbury-Turnersville Road, as well as to utilities. The property is zoned as Institutional, which includes governmental, educational, charitable, health care, and religious uses and would allow for construction and operation of an AFRC (Lex, 2010).

There are wetlands associated with the adjacent unnamed tributary to the South Branch of Big Timber Creek along the western and northwestern portion of the parcel. However, the parcel is large enough so that the Army would be able to avoid purchasing any land with wetlands on it. Approximately 1/4 acre of the 50-foot transition area buffer associated with the wetlands would be included in the land purchased. If construction activities were to encroach upon the buffer a Freshwater Wetlands Permit would be required from the New Jersey Department of Environmental Protection (NJDEP). In addition, because the NJDEP presumes there are acid producing soils on the site due to the underlying geologic formation (lower member of Kirkwood Formation) there is also a 150-foot riparian buffer associated with the unnamed tributary to the South Branch of Big Timber Creek. If soil testing confirms the presumed presence of acid producing soils the Army would need to either avoid the buffer area or obtain a permit under the Flood Hazard Area Control Act N.J.A.C. 7:13 to conduct allowable, regulated soil/vegetation disturbing

activities within the buffer. The Army would also need to commit to implementing mitigation measures to protect against impacts caused by disturbing acid producing soils.

Currently, three structures for the 4-H (two barns and a snack bar) and a parking lot for Camden County Health Department employees exist on the property and would need to be demolished. Should this site be chosen, the County would be responsible for relocating and/or constructing new facilities for the 4-H and the Camden County Health Department. There will be an effect from this action, but that the Army is not analyzing it in this EA because the site selection, design, and construction of the replacement 4-H structures and the parking lot for County Health Department employees would not be a federal action. However, in relocating/constructing the new facilities, the County would obtain all necessary permits and follow all state and local environmental regulations to ensure there were no significant impacts to the natural or human environment.

This site is identified as a reasonable alternative site for the project, and is fully evaluated in this EA as the Preferred Alternative.

ES.6 ENVIRONMENTAL CONSEQUENCES

Under the No Action Alternative, the proposed new BRAC facilities would not be constructed, and no environmental impacts would occur.

The Proposed Action would not have any significant adverse effects on any of the environmental or related resource areas within the local or surrounding areas of the alternative sites. All of the resource areas other than *Surface Water* and *Soils* on the Preferred Alternative site were evaluated to be at the No Effects or No Significant Effect levels. With the implementation of appropriate mitigation measures as stipulated by the NJDEP in the draft Technical Manual for Flood Hazard Area Control Act Rules N.J.A.C. 7:13 for the disturbance and disposal of acid producing soils, the impacts on surface waters and soils under the Preferred Alternative site were evaluated at the No Significant Effect level.

A summary of impacts by resource area for the No Action Alternative and the three action alternatives is provided in Table ES-2.

Table ES-2. Summary of the Impacts of the Proposed Action Alternatives

Resource	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Land Use				
Regional Geographic Setting and Location	No effect.	No effect.	No effect.	No effect.
Site Land Use	No effect.	No significant effect.	No significant effect.	No significant effect.
Current and Future Development in the Region of Influence	No effect.	No significant effect.	No significant effect.	No significant effect.
Aesthetic and Visual Resources	No effect.	No significant effect.	No significant effect.	No significant effect.
Air Quality				
Ambient Air Quality Conditions	No effect.	No significant effect.	No significant effect.	No significant effect.
Meteorology/Climate	No effect.	No effect.	No effect.	No effect.
Air Pollutant Emissions at Project Site	No effect.	No significant effect.	No significant effect.	No significant effect.
Regional Air Pollutant Emissions Summary	No effect.	No significant effect.	No significant effect.	No significant effect.
Noise	No effect.	No significant effect.	No significant effect.	No significant effect.
Geology and Soils				
Geologic and Topographic Conditions	No effect.	No significant effect.	No significant effect.	No significant effect.
Soils	No effect.	No significant effect.	No significant effect.	No significant effect with implementation of acid producing soil mitigation measures.
Prime Farmland	No effect.	No effect.	No effect.	No effect.
Water Resources				
Surface Water	No effect.	No significant effect.	No significant effect.	No significant effect with implementation of acid producing soil mitigation measures.
Wetlands	No effect.	No effect.	No significant effect.	No significant effect.

Resource	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Hydrogeology/Groundwater	No effect.	No significant effect.	No significant effect.	No significant effect.
Floodplains	No effect.	No effect.	No effect.	No effect.
Coastal Zone	No effect.	No effect.	No effect.	No effect.
Biological Resources				
Vegetation	No effect.	No significant effect.	No significant effect.	No significant effect.
Wildlife	No effect.	No significant effect.	No significant effect.	No significant effect.
Threatened, Endangered, and Sensitive Species	No effect.	No significant effect.	No significant effect.	No effect.
Cultural Resources				
Archaeology	No effect.	No effect.	No effect.	No effect.
Built Environment	No effect.	No effect.	No effect.	No effect.
Native American Resources	No effect.	No effect.	No effect.	No effect.
Socioeconomics				
Economic Development	No effect.	No significant effect.	No significant effect.	No significant effect.
Demographics	No effect.	No significant effect.	No significant effect.	No significant effect.
Environmental Justice	No effect.	No effect.	No effect.	No effect.
Protection of Children	No effect.	No effect.	No effect.	No effect.
Transportation				
Roadways and Traffic	No effect.	No significant effect.	No significant effect.	No significant effect.
Public Transportation	No effect.	No effect.	No effect.	No effect.
Utilities				
Potable Water Supply	No effect.	No significant effect.	No significant effect.	No significant effect.
Sanitary Sewer System	No effect.	No significant effect.	No significant effect.	No significant effect.
Electrical Service and Distribution	No effect.	No significant effect.	No significant effect.	No significant effect.
Stormwater System	No effect.	No significant effect.	No significant effect.	No significant effect.
Natural gas	No effect.	No significant effect.	No significant effect.	No significant effect.

Resource	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Communications	No effect.	No significant effect.	No significant effect.	No significant effect.
Municipal Solid Waste	No effect.	No significant effect.	No significant effect.	No significant effect.
Hazardous and Toxic Substances				
Uses of Hazardous Materials	No effect.	No significant effect.	No significant effect.	No significant effect.
Storage and Handling Areas	No effect.	No significant effect.	No significant effect.	No significant effect.
Site Contamination and Cleanup	No effect.	No significant effect.	No significant effect.	No significant effect.
Cumulative Effects	No effect.	No significant effect	No significant effect.	No effect.

ES.7 MITIGATION RESPONSIBILITY AND PERMIT REQUIREMENTS

None of the predicted effects of the Proposed Action would result in significant impacts under the Alternative 1 or Alternative 2 site locations; therefore, mitigation is not needed for implementing the Proposed Action at either of these two sites. However, the Army may consider the use of best management practices (BMPs) in the construction and operation of the AFRC and associated facilities, including specific measure to reduce potential erosion, stormwater runoff, and sediment transport during site preparation and construction activities.

For the Preferred Alternative site, implementing the Proposed Action would result in potential significant impacts to surface waters and soils if soil testing conducted by the Army confirms the presumed presence of acid producing soils. To prevent or minimize the problem of water pollution and soil contamination that may otherwise be caused by exposure of acid producing soils to the atmosphere, the NJDEP stipulates a number of mitigation measures that must be implemented when disturbing and/or disposing of acid producing soils (NJDEP, 2008e). If acid producing soils are confirmed on the Preferred Alternative site, the Army would commit to implementing the appropriate mitigation measures and work with the NJDEP to obtain the necessary permits for disturbing soils and vegetation within the 150-foot riparian zone (the buffer size is a result of the presence of acid producing soils) associated with the unnamed tributary of the South Branch of Big Timber Creek.

The following permits, plans and or mitigation measures would likely be required in implementing the Proposed Action identified in this analysis:

- A Stormwater Management Plan and a New Jersey Pollutant Discharge Elimination System (NJPDES) permit would likely be required.
- A Maintenance and Protection of Traffic (MPT) plan would be required and approved by Camden County and NJ Department of Transportation (DOT). The MPT would need to be prepared to the specifications of the Manual on Uniform Traffic Control Devices (MUTCD).
- For the Alternative 2 site, a New Jersey Freshwater Wetlands Permit may be required if the location of the approximately 10 acres to be purchased requires construction activities to occur within the buffer/transition area associated with any wetlands.
- For the Preferred Alternative site, a New Jersey Freshwater Wetlands Permit may be required if construction activities encroach upon the wetland buffer/transition area in the northwest portion of the property.
- For the Preferred Alternative, the Army would need to obtain a permit from the NJDEP under the Flood Hazard Area Control Act to construct in the riparian buffer (buffer size is 150-feet if soil testing conducted by the Army confirms the presumed presence of acid producing soils or 50-feet if no acid producing soils are present) and would need to implement mitigation measures as stipulated in the draft Technical Manual Flood Hazard Area Control Act Rules N.J.A.C. 7:13 (Section 7.5 General Mitigation Standards, Section 7.6 Mitigation Procedures Along Channels, and Section 7.7 Disposal of Acid Producing Soil Deposits) if it is confirmed that acid producing soils are present.

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1.0 PURPOSE, NEED, AND SCOPE

1.1 INTRODUCTION

On September 8, 2005, the Base Realignment and Closure (BRAC) Commission recommended that certain realignment actions occur in Camden, NJ. 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's recommendations must now be implemented as provided for in the Defense Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC law exempts consideration of the need for closing or realigning a military installation or the consideration of alternative installations in preparing environmental documentation pursuant to the National Environmental Policy Act (NEPA). However, NEPA analysis and documentation is required to analyze how the BRAC actions will be implemented.

The following are the BRAC Commission's recommendations for Camden, NJ (BRAC Commission, 2005)[3]:

- 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 *(sic)* AFRC shall have the capability to accommodate units from the New Jersey ARNG [Army National Guard] Armory, Burlington, if the state decides to relocate those units.

The BRAC Commission's recommendations considered the Secretary of Defense's justifications for recommended realignment actions in Camden, NJ. The Secretary's justifications, as quoted, are contained in Appendix A.

To implement this recommendation, the U.S. Army (Army) proposes to acquire sufficient and suitable land and to construct a new Armed Forces Reserve Center (AFRC) and related facilities in Camden County, NJ to support the BRAC-directed changes in force structure. The Army has determined that

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[3] Although the BRAC language indicates that the Nelson Brittin Army Reserve Center is located in Camden, NJ, it is actually located in Pennsauken, NJ.

locating the new facilities in Camden County meets the intent of the BRAC Commission's recommendation to locate the facilities in Camden, NJ.

During the initial site selection process in 2008 the Army identified two sites in Camden County (Alternative 1 – Cross Keys Road and Alternative 2 – Erial Road) that were considered to be reasonable alternatives for implementing the Proposed Action, and further identified the Cross Keys Road site as the preferred alternative site. The two alternative sites, as well as the No Action Alternative, were analyzed in an Environmental Assessment (EA) by the Army (USACE, 2009a). The EA was released for public review during a 30-day comment period beginning July 2, 2009. During the initial 30-day comment period the Army received requests from the Mayor of Gloucester Township and other citizens to extend the comment period by 30 days to allow the public adequate time to review and provide comments on the document. The Mayor and others also requested that a public meeting on the project be held in Gloucester Township. The Army granted a 30-day extension of the comment period until August 30, 2009 and the Army held a public meeting on the project in Gloucester Township on August 17, 2009.

During the extended 60-day public comment period a total of 47 sets of written comments were received from interested parties. In addition, a number of comments were made during the public meeting held on August 17, 2009. See Appendix E for the comments received and the Army's response to those comments. A number of topics were addressed in the comments. The topics of most concern dealt with potential impacts on residential property values and other socioeconomic impacts, removing a commercial property from a taxable status, visual impacts on neighboring residences, noise, traffic concerns, stormwater runoff and impacts to ground water, wildlife impacts, and concerns for impacts to children. In response to the public comments and the Mayor's concern about removing a commercial property from a taxable status, the Army granted Camden County the opportunity to identify additional sites for the Army to consider as alternatives for implementing the Proposed Action. Camden County offered three additional sites for the Army to consider. The Army convened a Site Survey Team and visited the sites on December 3, 2009 (USACE, 2009b). Upon review of the sites, the Army identified one site in the Lakeland area of Gloucester Township, NJ to be a reasonable alternative for implementing the Proposed Action. The Army has also identified this site as the preferred alternative for implementing the Proposed Action. Descriptions of all three additional sites, as well as the reasons for dismissing or carrying them forward for analysis in this EA, can be found in Section 3.0 - *Alternatives*.

This EA analyzes the potential environmental impacts associated with the acquisition of land, any demolition of structures required on that land, and the construction and operation of the new AFRC. In

addition to the original two alternative sites, this EA also analyzes the impacts of implementing the Proposed Action on the Preferred Alternative – Lakeland site.

Details on the Proposed Action are provided in Section 2.0.

1.2 PURPOSE AND NEED

The purpose of the Proposed Action is to implement those elements of the BRAC law that contain the BRAC Commission's recommendation pertaining to Camden, NJ.

The need for the Proposed Action is to improve the ability of the nation to respond rapidly to challenges of the 21st century. The Army is legally bound to defend the United States and its territories, support national policies and objectives, and defeat nations responsible for aggression that endanger the peace and security of the United States. To carry out these tasks, the Army must adapt to changing world conditions and must improve its capabilities to respond to a variety of circumstances across the full spectrum of military operations.

Base Realignment and Closure. In previous BRAC rounds, the explicit goal was to save money and downsize the military to reap a "peace dividend." In the 2005 BRAC round the Department of Defense's (DoD's) recommendations sought to reorganize its installation infrastructure to more efficiently support its forces, increase operational readiness, and facilitate new ways of doing business. Thus, BRAC represents more than cost savings; it supports advancing the goals of transformation, improving military capabilities, and enhancing military value. The Army needs to carry out the BRAC Commission's recommendations for Camden, NJ to achieve the objectives for which Congress established the BRAC process.

In Camden, NJ, this BRAC action is expected to significantly enhance the readiness of the affected units by providing sufficient classroom, storage, and administrative space required to train to Army standards and to meet anti-terrorism/force protection (AT/FP) standards. At the same time, these actions are expected to reduce costs associated with maintaining existing facilities and properties by combining two separate facilities into one modern AFRC.

1.3 SCOPE

This EA identifies, documents, and evaluates the potential environmental effects of the proposed BRAC realignment actions in Camden, NJ including the acquisition of land, any needed demolition of structures on that land, as well as, the construction and operation of the proposed facilities. This EA has been

developed in accordance with NEPA and implementing regulations issued by the President's Council on Environmental Quality (CEQ) and the Army.[4] The purpose of the EA is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and the alternatives for implementing it.

The Defense Base Closure and Realignment Act of 1990 specifies that NEPA does not apply to actions of the President, the Commission, or the DoD, except "(i) during the process of property disposal, and (ii) during the process of relocating functions from a military installation being closed or realigned to another military installation after the receiving installation has been selected but before the functions are relocated" (Sec. 2905(c)(2)(A), Public Law 101-510, as amended). The law further specifies that in applying the provisions of NEPA to the process, the Secretary of Defense and the secretaries of the military departments concerned do not have to consider "(i) the need for closing or realigning the military installation which has been recommended for closure or realignment by the Commission, (ii) the need for transferring functions to any military installation which has been selected as the receiving installation, or (iii) military installations alternative to those recommended or selected" (Sec. 2905(c)(2)(B)). The Commission's deliberations and decisions, as well as the need for closing or realigning a military installation, are exempt from NEPA. Accordingly, this EA does not address the need for realignment.

1.4 PUBLIC PARTICIPATION AND INVOLVEMENT

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

Public participation opportunities with respect to this EA and decision making on the Proposed Action are guided by 32 Code of Federal Regulations (CFR) Part 651. This EA is being made available to the public for 30 days, along with a draft Finding of No Significant Impact (FNSI). During this time the Army will consider any comments submitted by individuals, agencies, or organizations on the Proposed Action, the EA, or draft FNSI. At the conclusion of the comment period, the Army may, if appropriate, execute the

[4] Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, 40 Code of Federal Regulations (CFR) Parts 1500–1508, and Environmental Analysis of Army Actions, 32 CFR Part 651

FNSI and proceed with implementing the Proposed Action. If it is determined that implementing the Proposed Action would result in significant impacts, the Army will commit to mitigation actions sufficient to reduce impacts below significance levels or publish in the *Federal Register* a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

Interested parties are invited to review and comment on the EA and Draft FNSI within 30 days of publication. The EA and Draft FNSI can be accessed on the World Wide Web at:
http://www.hqda.army.mil/acsim/brac/env_ea_review.htm

Copies of the EA can also be viewed at the following libraries:

Marie Fleche Memorial Library
49 S White Horse Pike
Berlin, NJ 08009

Pennsauken Free Public Library
5605 Crescent Blvd.,
Pennsauken NJ, 08110

Library Co. of Burlington
23 West Union Street
Burlington NJ 08016

Blackwood Rotary Library
Gloucester Township Branch
15 S. Black Horse Pike
Blackwood, NJ 08012

Winslow Township Branch Library
131 S Route 73
Braddock, NJ 08037

Comments on the EA and Draft FNSI should be submitted during the 30-day public comment period via mail, fax, or electronic mail to:

Laura Dell'Olio,
Environmental /NEPA Specialist,
Innovar Environmental Inc., supporting,
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Fax: (609) 562-7983
email: laura.dellolio@usar.army.mil

1.5 IMPACT ANALYSIS PERFORMED

An interdisciplinary team has analyzed the Proposed Action and alternatives in light of existing conditions and has identified relevant beneficial and adverse impacts associated with the action. Section 1.0 of the EA provides the purpose, need, and scope. The Proposed Action is described in Section 2.0 and the alternatives, including the No Action Alternative, are described in Section 3.0. Conditions existing as of 2008 are considered to be the "baseline" conditions and are described in Section 4.0 - Affected Environment and Environmental Consequences. The expected impacts of the Proposed Action, also described in Section 4.0, are presented immediately following the description of baseline conditions

for each environmental resource addressed in the EA. Section 4.0 also addresses the potential for cumulative effects and mitigation measures are identified where appropriate. Section 5.0 presents the findings and conclusions.

1.6 FRAMEWORK FOR ANALYSIS

The selection of a Preferred Alternative site 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 that establish standards and provide guidance for environmental and natural resources management and planning.

1.6.1 Relevant Statutes and Executive Orders

Relevant statutes include, but are not limited to, the Clean Air Act (CAA), Clean Water Act (CWA), Noise Control Act, Endangered Species Act (ESA), National Historic Preservation Act (NHPA), Archaeological Resources Protection Act (ARPA), Resource Conservation and Recovery Act (RCRA), and Toxic Substances Control Act (TSCA). Executive Orders bearing on the Proposed Action include Executive Order (EO) 11988 (*Floodplain Management*), EO 11990 (*Protection of Wetlands*), EO 12088 (*Federal Compliance with Pollution Control Standards*), EO 12580 (*Superfund Implementation*), 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*), and EO 13423 (*Strengthening Federal Environmental, Energy, and Transportation Management*). These authorities are addressed in various sections throughout this EA when relevant to environmental resources and conditions. The full text of the laws, regulations, and EOs is available on the Defense Environmental Network & Information Exchange Web site at http://www.denix.osd.mil.

2.0 DESCRIPTION OF THE PROPOSED ACTION

2.1 INTRODUCTION

This section describes the U.S Army's Proposed Action for implementing the BRAC Commission's recommendations for Camden, NJ. The following are the BRAC Commission's recommendations for Camden, NJ (BRAC Commission, 2005)[5]:

- 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 (sic) AFRC shall have the capability to accommodate units from the New Jersey ARNG Armory, Burlington, if the state decides to relocate those units.

2.2 PROPOSED ACTION/IMPLEMENTATION PROPOSED

The Proposed Action is to acquire sufficient and suitable land in Camden County, NJ; to construct a new AFRC and associated support facilities; and relocate six Army Reserve units and one New Jersey Army National Guard (NJARNG) unit from the local area (Camden County and Burlington County, NJ). The Army has determined that locating the new facilities in Camden County meets the intent of the BRAC Commission's recommendation to locate the facilities in Camden, NJ. Figure 2-1 provides a project vicinity map indicating the locations under consideration for the proposed AFRC site in the larger Camden community.

The Proposed Action is further detailed below, in the *Facilities* (Section 2.3.1), *Equipment* (Section 2.3.2), and *Personnel* (Section 2.3.3) sub-sections.

2.2.1 Facilities

The proposed AFRC would provide a training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for six Army Reserve units and one NJARNG unit. Associated support facilities include an Organizational Maintenance Shop (OMS), and an unheated storage building. The approximate size of the AFRC and the additional support facilities are

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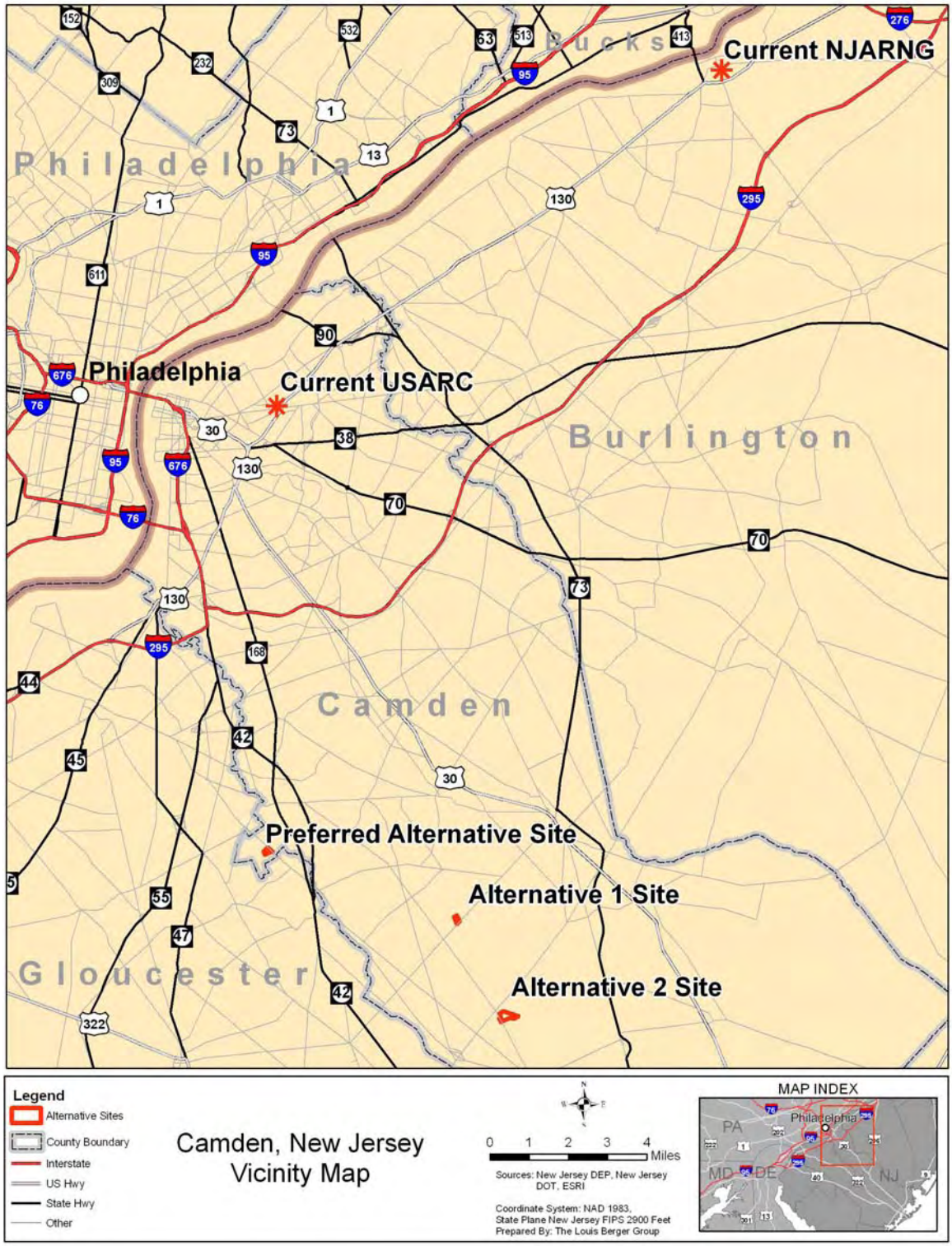
[5] Although the BRAC language indicates that the Nelson Brittin Army Reserve Center is located in Camden, NJ, it is actually located in Pennsauken, NJ.

Figure 2-1. Project Vicinity Map



provided in Table 2-1. In addition, there would be approximately 2.25 acres of paved areas including 1.20 acres of military equipment parking (MEP) areas and 1.05 acres of privately-owned vehicle (POV) parking areas and access roads.

Table 2-1. AFRC Complex Building Sizes

Building	Approximate Size (square feet (SF))
Armed Forces Reserve Center	53,291
OMS	6,933
Unheated-unit storage building	1,217

Source: U.S. Army, 2008a

Supporting improvements proposed to complement the AFRC and associated facilities include paving, fencing, the extension of utilities to service the project, and general site improvements. AT/FP safety and security measures, including minimum stand-off distance from roads, parking areas and vehicle unloading areas, would be incorporated into the facility designs and siting, and accessibility for disabled persons would also be provided (U.S. Army, 2008a). The three alternative site locations for the facilities are described further under the Alternative 1 – Cross Keys Road site, Alternative 2 – Erial Road site, and Preferred Alternative - Lakeland site in *Section 3.2 - Alternatives*.

2.2.2 Personnel

Implementing the BRAC Commission's recommendations for Camden, NJ would result in the total assignment of approximately 364 personnel to the new AFRC, 347 of whom are reservists/part-time soldiers and 17 of whom are full-time personnel (see Table 2-2 for a breakdown of the number of personnel by unit relocating to the AFRC complex.) Each unit will be drilling on one of three weekends each month, meaning that not all personnel would be using the facilities on the same weekend. The maximum number of personnel using the facilities on a drill weekend would be 184. Of these personnel none would be coming from outside of the local region. The potential direct and/or cumulative impacts on the environment from the increase in personnel associated with the new AFRC are considered in this EA.

2.2.3 Equipment

The relocation and realignment of reserve units to the proposed AFRC would also bring associated unit vehicles, equipment, and materials. The total number of vehicles that would relocate to the AFRC is

projected to be approximately 101, including 61 wheeled vehicles, 40 trailers, and 0 tracked vehicles. Table 2-3 provides a breakdown of the number of vehicles by unit relocating to the AFRC complex.

Table 2-2. 2005 BRAC Action – Camden, NJ: Personnel Changes

Action	Organization	From	Total Number of Reservists/ Part-time Soldiers	Total Number of Full-time Personnel
Incoming	417 Battalion (Brigade Combat Team)	Brittin USARC Camden, NJ	69	3
Incoming	357 Platoon 1 (Reconnaissance)	Brittin USARC Camden, NJ	27	0
Incoming	357 Platoon 3 (Decontamination)	Brittin USARC Camden, NJ	21	0
Incoming	357 Platoon 4 (Decontamination)	Brittin USARC Camden, NJ	21	1
Incoming	357 Headquarters Detachment	Brittin USARC Camden, NJ	25	6
Incoming	716 Platoon 2 (POL Support)(50K)	Brittin USARC Camden, NJ	53	4
Incoming	Company C 1/114 Infantry	NJARNG Burlington, NJ	131	3
		TOTAL	**347**	**17**

Source: U.S. Army, 2008b; Phillips, 2008

Table 2-3. 2005 BRAC Action – Camden, NJ AFRC: Equipment Relocations

Action	Organization	From	Total Number: Wheeled Vehicles	Total Number: Trailers	Total Number: Tracked Vehicles
Incoming	417 Battalion (Brigade Combat Team)	Brittin USARC Camden, NJ	0	0	0
Incoming	357 Platoon 1 (Reconnaissance)	Brittin USARC Camden, NJ	7	0	0
Incoming	357 Platoon 3 (Decontamination)	Brittin USARC Camden, NJ	10	6	0

Action	Organization	From	Total Number: Wheeled Vehicles	Total Number: Trailers	Total Number: Tracked Vehicles
Incoming	357 Platoon 4 (Decontamination)	Brittin USARC Camden, NJ	10	6	0
Incoming	357 Headquarters Detachment	Brittin USARC Camden, NJ	9	6	0
Incoming	716 Platoon 2 (POL Support)(50K)	Brittin USARC Camden, NJ	20	22	0
Incoming	Company C 1/114 Infantry	NJARNG Burlington, NJ	5	0	0
		TOTAL	**61**	**40**	**0**

Source: U.S. Army, 2008b; Phillips, 2008

2.3 SCHEDULE

As required by the BRAC statute, the Army must have initiated all realignments not later than September 15, 2007, and complete all realignments not later than September 15, 2011.[6] At a minimum, this means that the full-time employees must be relocated to their new site no later than September 15, 2011.

Implementation of the Proposed Action is proposed to occur over a span of approximately 19 months, as shown in the schedule contained in Table 2-4.

Table 2-4. Schedule of Camden, NJ 2005 BRAC Projects

Project Number	Project Title	Estimated Construction Start	Estimated Construction Completion	Estimated Unit Relocation
CAR 10-64507	Armed Forces Reserve Center	July 2010	January 2012	Full-Time Employees – no later than September 15, 2011 Reservists – no later than January 2012

Source: Jasper, 2010

[6] Section 2904(a), Public Law 101-510, as amended, provides that the Army must "… initiate all closures and realignments no later than two years after the date on which the President transmits a report [by the BRAC Commission] to the Congress … containing the recommendations for such closures or realignments; and … complete all such closures and realignments no later than the end of the six year period beginning on the date on which the President transmits the report … " The President took the specified action on September 15, 2005.

With the additional time needed to evaluate the potential impacts of implementing the Proposed Action on the Preferred Alternative – Lakeland site, construction of the new AFRC facilities would not be completed until after the mandated realignment date of September 15, 2011. However, to meet the BRAC statute the Army would relocate the full-time employees to temporary trailer facilities on the site that is selected for implementing the Proposed Action prior to September 15, 2011. Consistent with Section II(b)(7) of Appendix B of 32 CFR 651, during the period after September 15, 2011 until the facilities are completed early in 2012, reservists would temporarily relocate to available spaces on nearby Fort Dix. The reserve units' military equipment would be temporarily relocated to available MEP space on Fort Dix as well. Once construction of the new AFRC facilities is completed in Camden County, the reservists, their military equipment, and the full-time employees would relocate to the new facilities.

3.0 ALTERNATIVES

3.1 INTRODUCTION

A key principle of NEPA is that agencies are to give full consideration to all 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 affordable, capable of implementation, and satisfactory with respect to meeting the purpose of and need for the action. The following discussion identifies alternatives considered by the Army and identifies whether they are feasible and, hence, subject to detailed evaluation in this EA.

Alternatives to the Proposed Action have been examined according to three variables: the means to accommodate realigned units, siting of new construction, and schedule. This section presents the alternatives available for the Proposed Action. This section also describes the No Action Alternative, under which the Proposed Action would not be implemented.

3.2 ALTERNATIVES

The BRAC Commission's recommendations direct that the existing Nelson Brittin Army Reserve Center in Camden, NJ[7] be closed and the units relocated to a new AFRC to be constructed in Camden, NJ if suitable land can be acquired, and that the facilities be able to accommodate units from the NJARNG Armory in Burlington, NJ if the state decides to relocate those units.

Construction of new facilities is driven by the need to ensure adequate space is available for the mission requirements of the realigning units. To facilitate the construction of the proposed facilities twelve locations within Camden County, NJ were identified in the Available Site Identification and Validation (ASIV) Report - Camden, NJ (USACE, 2008) for investigation. The Army determined that locating the new facilities in Camden County meets the intent of the BRAC Commission's recommendation to locate the facilities in Camden, NJ. The Army convened a Site Survey Team, made up of Army, U.S. Army Corps of Engineers (USACE), NJARNG, and contractor members, to determine whether these locations

[7] Although the BRAC language indicates that the Nelson Brittin Army Reserve Center is located in Camden, NJ, it is actually located in Pennsauken, NJ.

could be considered reasonable alternatives for implementing the Proposed Action. The following criteria were used in the determination:

- Net useable area – 9 acres
- Meets AT/FP set back requirements
- Site will support intended constructing and is environmentally clean
- Ready access to public utilities
- Reasonable cut or fill requirements
- Proximity to major roadway corridor
- Expectation that the fair market appraisal will support the purchase price – i.e. land is within budget
- Meets appropriate zoning/antiterrorism considerations
- Property is within Camden County, NJ and within a 50-mile radius of the existing Nelson Brittin U.S. Army Reserve Center (USARC)

Three of the twelve properties were sold prior to the Site Survey Team convening. Of the remaining nine sites, two were considered to be reasonable alternatives (Alternative 1 and Alternative 2) and are analyzed in depth in this EA. The other seven sites were determined not to be viable alternatives because they did not meet all of the evaluation criteria, and are therefore not carried forward for analysis in this EA.

As described in *Section 1.1 – Introduction*, the Army received a number of comments during the public review period for the initial EA expressing concern regarding the two alternatives being evaluated. In response to the public concerns, the Army granted Camden County the opportunity to identify additional sites for the Army to consider for implementing the Proposed Action. Camden County provided three additional County-owned sites for the Army to consider. After an initial review of the sites, one was determined to be a reasonable alternative and is fully analyzed in this EA. The other two sites did not meet all of the evaluation criteria and were dismissed from further analysis.

The location of all twelve sites considered is depicted in Figure 3-1. The location of the three alternative sites analyzed in this EA are further depicted in Figures 3-2, 3-3, and 3-4 respectively. All of the sites are briefly discussed below.

Alternative 1 – Cross Keys Road

One location for the AFRC and its supporting facilities is located at 389 Cross Keys Road, Gloucester Township Camden County, NJ (Figures 3-1 and 3-2). The site consists of approximately 11 acres of vacant agricultural land which has been used in the past for crops and livestock. The property is currently zoned as commercial. The site meets the acreage requirements for the proposed project and can

Figure 3-1. Potential Alternative Sites for the Proposed AFRC at Camden, NJ

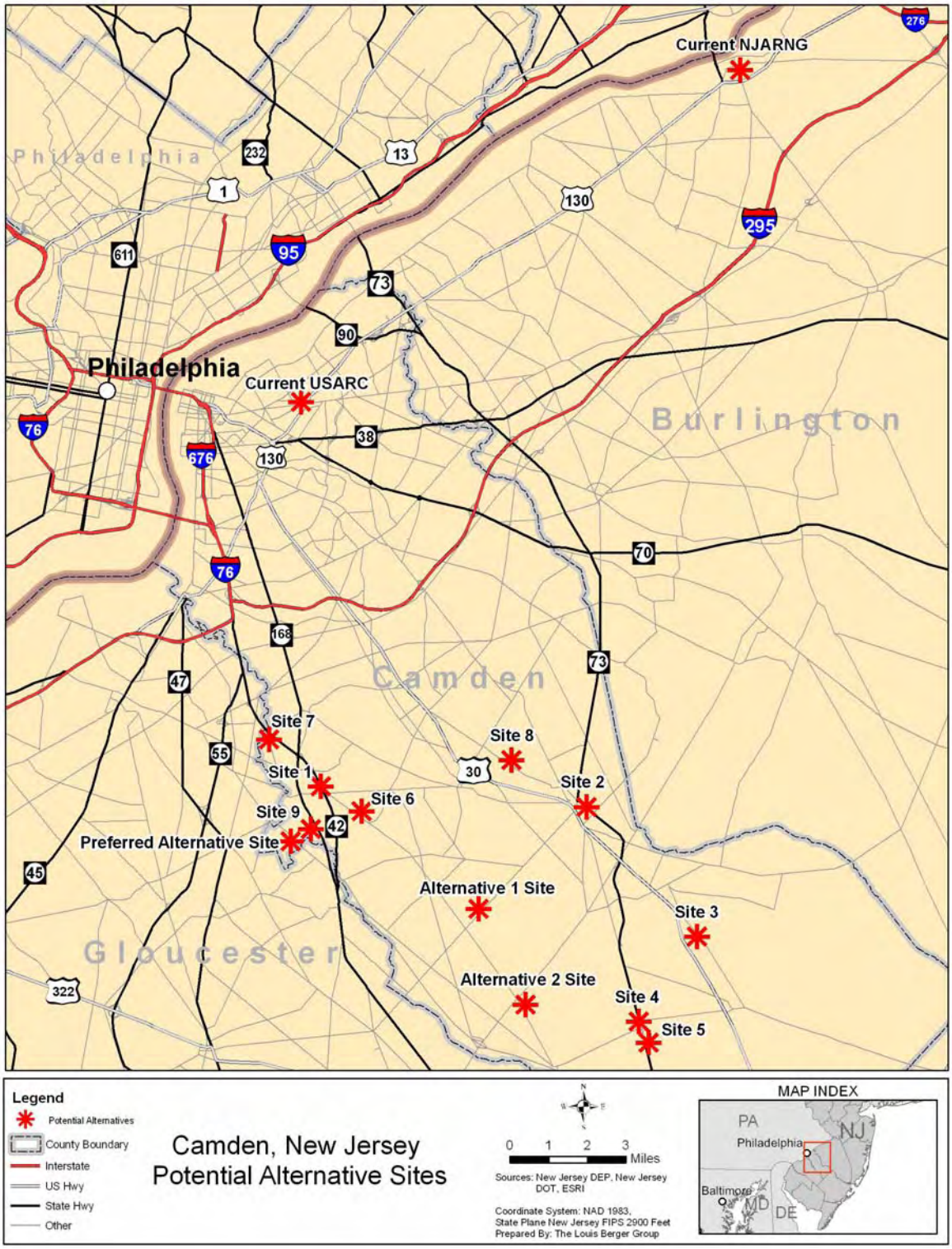


Figure 3-2. Alternative 1 Site for Camden, NJ – 389 Cross Keys Road

Note: This site was cleared of trees by the current property owner in 2007. There is no recent aerial image depicting the current condition of the property.

accommodate the necessary AT/FP set back requirements. The site also provides good exposure to the public, which is beneficial for recruiting purposes. The site was cleared and graded in 2007 with only a few remaining mature trees that may need to be cleared; therefore, relatively little site preparation is required other than the demolition of one standing structure on the property. The structure is a small residence on the southeastern portion of the property that is occupied by the former owner of the property. He has an understanding with the current owner that he will relocate once the property is sold. This house will need to be demolished and is likely to contain lead based paint and asbestos.

The site has easy access off of Cross Keys Road which is slated to be widened from a 2-lane to a 4-lane thorough fare at some point in the future. Immediate access to utilities is available along Cross Keys

Road except for sewer which is located approximately 300 feet from the property line. There is also a 20-foot wide by 500-foot long easement to AT&T Co. of New Jersey that transverses the property in an east-west direction for an underground telephone line that formerly served a nearby Army Nike Installation. The line was abandoned when the Nike site was closed in the late 1960's, but AT&T has never extinguished the easement. The section of the old easement that runs through an adjacent residential area has been extinguished (U.S. Army, 2008c and USACE, 2008). This site is identified as a reasonable alternative site for the project, and is fully evaluated in this EA.

Alternative 2 – Erial Road

This site is located at 320 Erial Road, Sicklerville (Winslow Township, Camden County), approximately 2.5 miles from the Atlantic City expressway south of Camden, but still within Camden County. The property consists of a total of approximately 34 acres of farm land (Figures 3-1 and 3-3). The site is flat and would not require extensive site preparation and has easy access to Erial Road. The site also provides good exposure to the public, which is beneficial for recruiting purposes. There are no buildings on the site so no demolition is required and it is zoned as commercial, mixed use. There are wetlands associated with the unnamed tributary to the Great Egg Harbor River along the northeast portion of the parcel. There is also an easement for an overhead electrical transmission line along the far eastern portion of the property.

The owner of the property is willing to subdivide it, and if this alternative is selected, the Army would purchase approximately 10 acres of the 34 acre parcel in order to meet the necessary AT/FP set back

Figure 3-3. Alternative 2 Site for Camden, NJ – 320 Erial Road

distances. The wetland areas associated with the unnamed tributary and the easement for the electrical transmission line would not be included in the 10 acres that the Army would purchase. The Army would also include only as much street frontage as necessary in the purchase to facilitate proper ingress and egress of POVs and military equipment (Nuremburg, 2008).

Access to all utilities, except for sanitary sewer, is available at the site. A constraint on the site is that there is not sufficient sanitary sewer capacity at the site and there is a sewer moratorium in this area of Winslow Township. However, the Township has submitted an application to lift the moratorium (Gallagher, 2010).

This site was identified as a reasonable alternative site for the project, and is fully evaluated in this EA (U.S. Army, 2008c).

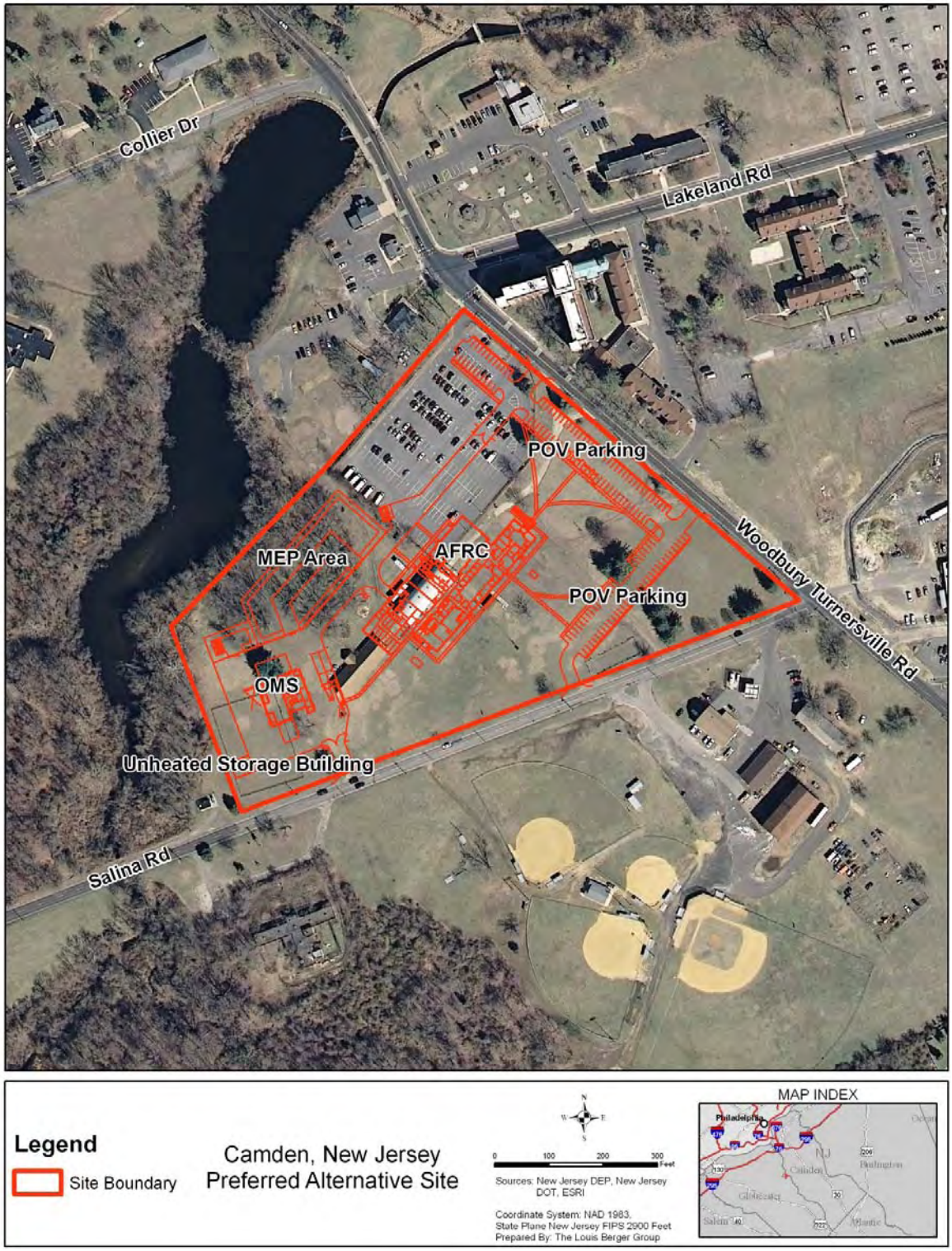
Preferred Alternative – Lakeland

This site, also known as the 4-H County Fairgrounds, is located at 295 Woodbury-Turnersville Road in the Lakeland area of Gloucester Township, NJ (Figures 3-1 and 3-4). Figure 3-4 also shows a schematic layout of the proposed facility. The property consists of approximately 12 acres and can adequately accommodate the necessary AT/FP set back distances. The site is relatively flat and would not require extensive site preparation and has easy access to Woodbury-Turnersville Road, as well as to utilities. The property is zoned as Institutional, which includes governmental, educational, charitable, health care, and religious uses and would allow for construction and operation of an AFRC (Lex, 2010).

There are wetlands associated with the adjacent unnamed tributary to the South Branch of Big Timber Creek along the western and northwestern portion of the parcel. However, the parcel is large enough so that the Army would be able to avoid purchasing any land with wetlands on it. Approximately 1/4 acre of the 50-foot transition area buffer associated with the wetlands would be included in the land purchased. If construction activities were to encroach upon the buffer a Freshwater Wetlands Permit would be required from the New Jersey Department of Environmental Protection (NJDEP).

In addition, because the NJDEP presumes there are acid producing soils on the site due to the underlying geologic formation (lower member of Kirkwood Formation) there is also a 150-foot riparian buffer associated with the unnamed tributary to the South Branch of Big Timber Creek. If soil testing confirms the presumed presence of acid producing soils, the Army would need to either avoid the buffer area or obtain a permit under the Flood Hazard Area Control Act N.J.A.C. 7:13 to conduct allowable, regulated

Figure 3-4. Preferred Alternative Site for Camden, NJ – 295 Woodbury Turnersville Road



soil/vegetation disturbing activities within the buffer. The Army would also need to commit to implementing mitigation measures to protect against impacts caused by disturbing acid producing soils.

Currently, three structures for the 4-H (two barns and a snack bar) and a parking lot for Camden County Health Department employees exist on the property and would need to be demolished. Should this site be chosen, the County would be responsible for relocating and/or constructing new facilities for the 4-H and the Camden County Health Department. There will be an effect from this action, but that the Army is not analyzing it in this EA because the site selection, design, and construction of the replacement 4-H structures and the parking lot for County Health Department employees would not be a federal action. However, in relocating/constructing the new facilities, the County would obtain all necessary permits and follow all state and local environmental regulations to ensure there were no significant impacts to the natural or human environment.

This site is identified as a reasonable alternative site for the project, and is fully evaluated in this EA as the Preferred Alternative (USACE, 2009b).

Locations Dismissed from Further Analysis

During site investigations the following nine sites were dismissed by the Site Survey Team as possible alternative sites because they did not meet all of the evaluation criteria.

Site 1 – 790 Little Gloucester Road, Gloucester Township, NJ

This site was deemed not a viable alternative because of site access issues, site configuration issues, and its proximity to the 100-year flood zone (U.S. Army, 2008c).

Site 2 – 130 South Route 73, Berlin, NJ

This site was a former wholesale fuel oil distribution center. It was deemed not a viable alternative because of the presence of underground fuel oil storage tanks, as well as for cost reasons relating to the price of the property and the cost of demolishing the existing buildings on site (U.S. Army, 2008c and USACE, 2008).

Site 3 – 2096 Hendricks Avenue, Waterford Works, NJ

This site was deemed not be a viable alternative because it lacked the minimum 500 foot boundary on two of the four sides to comply with antiterrorism standards. The site is also a fully wooded-lot in an

exclusively residential area, which would likely create local opposition to the proposed project (U.S. Army, 2008c).

Site 4 – 14 Beebetown Road, Hammonton, NJ

This site is bisected by a creek and was deemed not a viable alternative for environmental and flood plain concerns relating to the creek (U.S. Army, 2008c).

Site 5 – 11 Trestle Avenue, Hammonton, NJ

This site was deemed not a viable alternative for environmental and zoning issues. The site is only accessible through a small, private drive, within a community of small dwellings and larger farms. It is also located within the limits of the New Jersey Pine Barrens District which imposes restrictions on development (U.S. Army, 2008c).

Site 6 – 1324 Little Gloucester Road, Blackwood, NJ

This site met most of the evaluation criteria as it is flat, level, of adequate size, and with ready access to a main thoroughfare as well as utilities. It was deemed not a viable alternative because it did not meet the minimum 500 foot boundary length along two of its four sides to comply with antiterrorism standards (U.S. Army, 2008c).

Site 7 – 851 Lower Landing Road, Blackwood, NJ

This 20 acre site was deemed not a viable alternative for multiple reasons. The site is heavily forested and would require extensive site preparation. Current access to the site is through a burial vault manufacturing company. The creation of a new access point off of Lower Landing Road would require construction of a 400 foot, 5 percent grade, ramp to offset the drop in elevation from the roadway. The rear of the site is adjacent to a floodplain and would require extensive water management planning. Also, there is miscellaneous debris and garbage scattered throughout the entire site indicating that it is likely an illegal dump site. In addition, the site is 20 acres, more than double that needed for the proposed project and the owner is reluctant to subdivide the property, which would leave the Army owning approximately 10 additional acres it does not need. Although the asking price is half of that for the two viable sites, the costs associated with site preparation, tree clearing, constructing the new access road, and the possible need to construct a sewer lift station would more than offset any potential land acquisition savings (U.S. Army, 2008c).

Site 8 – 2311 Egg Harbor Road, Lindenwold, NJ

This site was deemed not a viable alternative for configuration and AT/FP issues. The site configuration does not adequately allow for proper AT/FP setbacks. Additionally, the site contains highly uneven elevations and sandy soils that would be difficult to construct on (USACE, 2009b).

Site 9 – Lakeland 1

This 11.3 acre site was deemed not a viable alternative because it contains two non-contiguous parcels, separated by Lakeland Road. The site is also on an uneven slope and does not meet the specification for reasonable cut and fill requirements (USACE, 2009b).

Scheduling Alternatives

The schedule for implementing the Proposed Action must balance the timeframes for constructing the new facilities and the planned arrival dates of incoming units, all within the 6-year limitation of the BRAC law (see Section 2.3). Per the BRAC Law, the proposed realignment actions for Camden, NJ were initiated prior to September 15, 2007. Completion of realignment prior to the September 15, 2011 is not feasible due to the time required to complete the evaluation of the third alternative site and design and construct the new facilities. Congress requires all BRAC actions to be completed by September 15, 2011. To meet this requirement, as discussed in Section 2.3, the Army would relocate full-time employees to temporary trailer facilities on the selected site. Since earlier implementation is not possible, and since delay is avoidable, alternative schedules are not further evaluated in this EA.

No Action Alternative

CEQ regulations require the No Action Alternative to be included in an EA, for it serves as the baseline against which the impacts of the proposed action and alternatives will be evaluated. Accordingly, the No Action Alternative is evaluated in this EA.

Under the No Action Alternative the Proposed Action for Camden, NJ would not be implemented and the Army Reserve units as well as the NJARNG unit would continue to train at and operate from their current locations with current facilities which are outdated, inadequate, and inefficient. Routine replacement or renovation actions could occur through normal military maintenance and construction procedures as circumstances independently warrant.

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4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

4.1 INTRODUCTION

This section describes the current environmental conditions of the areas that would be affected should the Proposed Action be implemented. It also analyzes the potential effects arising from implementing the Proposed Action. The description of environmental conditions represents the baseline conditions, or the "as is" or "before the action" conditions at the installation and is defined as the level of operations and environmental conditions as of 2008. The baseline facilitates subsequent identification of changes in conditions that would result from the realignment. The environmental consequences portion represents the culmination of scientific and analytic analysis of potential effects arising from implementing the Proposed Action. Direct, indirect, and cumulative effects of the Proposed Action are also addressed.

For each environmental resource area the baseline conditions are presented first followed immediately thereafter by evaluation of the potential impacts of the No Action and the three action alternatives. Where appropriate and definable, a specific Region of Influence (ROI) is indicated for a given resource area.

4.2 LAND USE

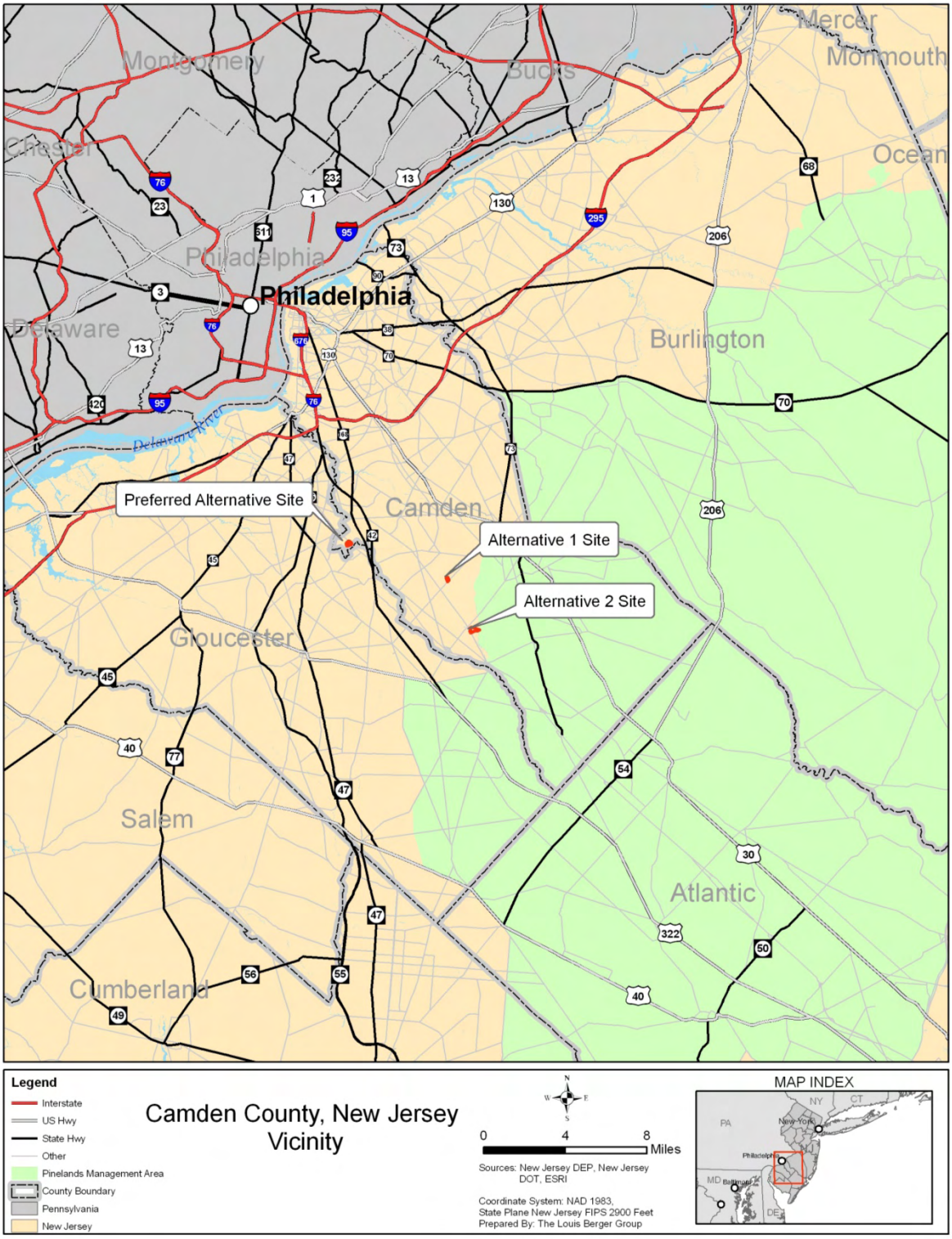
4.2.1 Affected Environment

The ROI for land use is defined as Camden County, New Jersey.

4.2.1.1 Regional Geographic Setting and Location

Camden County is located in southwestern New Jersey (Figure 4-1). Adjacent counties include Gloucester to the southwest, Atlantic to the southeast, and Burlington to the northeast. The city of Philadelphia, Philadelphia County, Pennsylvania is located northwest of Camden County, immediately across the Delaware River. Camden County is comprised of 222.3 square miles and 37 municipalities (Camden, 2001), including Gloucester Township (location of the Alternative 1 site and the Preferred Alternative site) and Winslow Township (location of Alternative 2). The County has a population of 508,932 residents (Census, 2000) and consists of developed areas with residential, commercial, and industrial facilities, as well as agricultural areas. The County Seat is Camden.

Figure 4-1. Camden County Vicinity Map



Gloucester Township is a 24-square mile suburban community situated in Camden County, within the Philadelphia Metropolitan area. It is located approximately 8 miles southeast of Philadelphia and 50 miles west of Atlantic City, and served by the North/South Freeway (Route 42), the Black Horse Pike (Route 168) and numerous well-maintained county and municipal roads (Gloucester Township, 2008). Winslow Township contains 57.4 square miles (Winslow Township, 2008) and is located in the southwestern corner of Camden County.

The New Jersey Pinelands - The Pinelands is an important ecological area designated as a National Reserve by Congress and the State of New Jersey and as a Biosphere Reserve by the United Nations. The Pinelands covers an area of 1.1 million acres, which is 22 percent of the state's total area and is comprised of a patchwork of pine oak forests, streams, rivers, and wetlands, and stretches across southern New Jersey (NJPC, 2008). Gloucester Township, where the Alternative 1 and Preferred Alternative sites are located, is not within the New Jersey Pinelands Management Areas (NJPC, 2008) (see Figure 4-1). Much of Winslow Township is located within the New Jersey Pinelands Management Areas; however, the Alternative 2 site is located just outside of the management area (NJPC, 2008; McGlinchey, 2008) (see Figure 4-1). Therefore, the regulations and standards outlined in the Pinelands Comprehensive Management Plan would not apply to the implementation of the Proposed Action at any of the three alternative sites.

4.2.1.2 Site Land Use

In 2002, the New Jersey Department of Environmental Protection (NJDEP) updated their Land Use Land Cover dataset (3rd iteration) to capture the status of the land use and natural land cover statewide (NJDEP, 2002). According to the 2002 Land Use Land Cover dataset existing land use within Camden County consists of 50 percent Urban, 25 percent Forest, 14 percent Wetlands, 6 percent Agriculture, 3 percent Water, 1 percent Barren Land, and less than 1 percent Other (NJDEP, 2002).

The Alternative 1 site is located at 389 Cross Keys Road, Sicklerville, Gloucester Township, Camden County, NJ. The site boundary encompasses approximately 11 acres. The once forested site is currently vacant land containing a single occupied residence on the southeastern portion of the parcel. There is a 20 foot x 500 foot easement to AT&T Co. of New Jersey for an abandoned underground telephone line that traverses the property in the east-west direction. Current land use is designated as Urban, Agriculture, and Forest (see Figure 4-2). The portion of the site that was categorized as Forest was cleared and graded in 2007 and now only contains a few remaining mature trees around the western and northern perimeter

Figure 4-2. Land Use – Alternative 1 Site

Note: Land use designations are from 2002 NJDEP Land Use Land Cover dataset (3rd iteration). Changes in land use have occurred since 2002 and land use designations may not be indicative of the current situation. This site was cleared and graded by the current land owner in 2007.

of the parcel and around the southeast corner of the parcel. The cleared areas are now covered with grass. The site is zoned for commercial development.

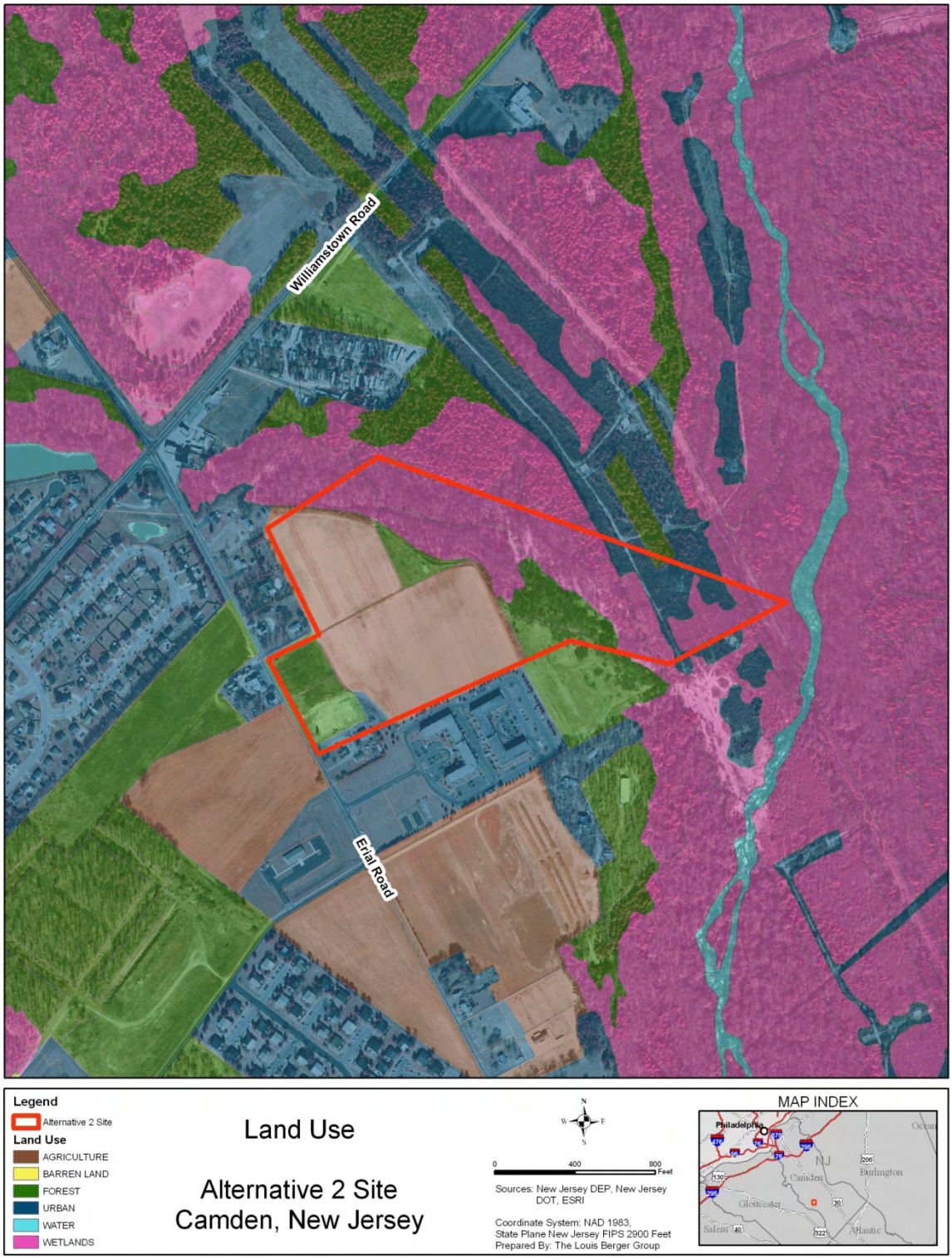
The Alternative 2 site is located at 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ. The site boundary encompasses approximately 34 acres; however, the Army would only purchase approximately 10 acres. The site is currently working farmland with no buildings on-site; though there are several residences adjacent to the northwestern boundary (see Figure 4-3). There is a Public Service Electric & Gas (PSE&G) overhead electrical transmission line easement over the rear of the property, opposite the Erial Road Frontage. Current land use is designated as Agriculture, Urban, Forest, and Wetland (see Figure 4-3). The site is zoned as minor commercial development.

The Preferred Alternative site is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ. The site boundary encompasses approximately 12 acres and currently contains three structures for the 4-H (two barns and a snack bar) and a parking lot for Camden County Health Department employees. Current land use is designated as Urban and Forest (see Figure 4-4). The property is zoned as Institutional, which includes governmental, educational, charitable, health care, and religious uses (Camden County, 2010).

4.2.1.3 Current and Future Development in the Region of Influence

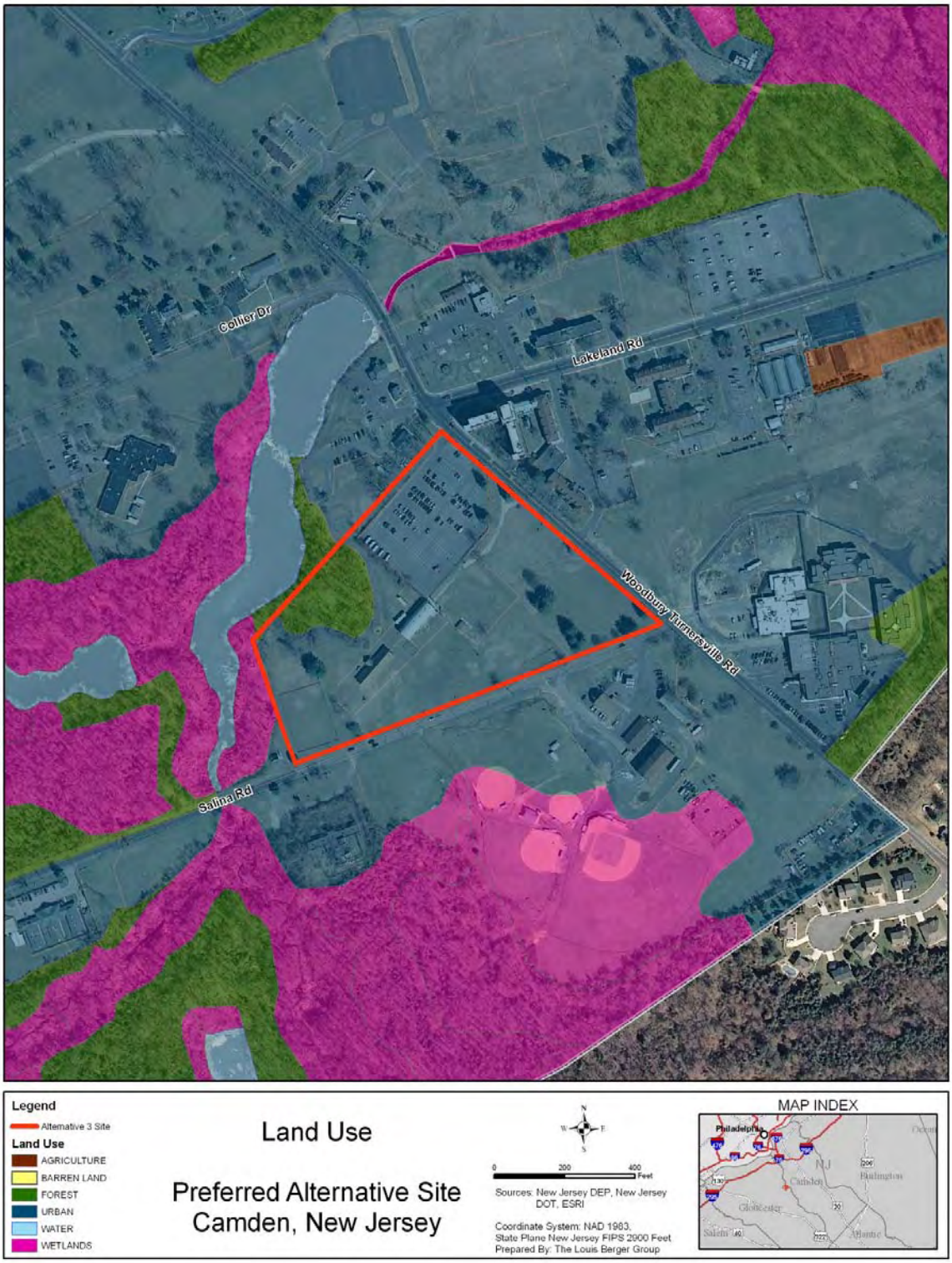
Camden County is part of the Philadelphia-Camden-Wilmington Metropolitan Statistical Area (MSA), which consists of the metropolitan area surrounding Philadelphia, PA. This region contains built-up urban areas and is densely populated with a population of approximately 5.8 million (BEA, 2006). The Philadelphia-Camden-Wilmington MSA is ranked the fifth largest MSA in the country (BEA, 2006). The 1996-2006 average annual growth rate of per capita personal income (PCPI) was 4.7 percent. The average annual growth rate for the nation was 4.3 percent (BEA, 2006). There is room and opportunity for new development within the ROI, including Camden County, to keep up with the growth of the region.

Figure 4-3. Land Use - Alternative 2 Site



Note: Land use designations are from 2002 NJDEP Land Use Land Cover dataset (3rd iteration). Changes in land use may have occurred since 2002 and land use designations may not be indicative of the current situation.

Figure 4-4. Land Use - Preferred Alternative Site



Note: Land use designations are from 2002 NJDEP Land Use Land Cover dataset (3rd iteration). Changes in land use have occurred since 2002 and land use designations may not be indicative of the current situation.

4.2.2 Environmental Consequences

Impacts to land use were determined by the following criteria:

No Effect – No impacts to surrounding land use from the proposed project.

No Significant Effect – The impact to land use would be measurable or perceptible, but would be limited to a relatively small change in land use that is still consistent with the surrounding land uses.

Significant Effect – The impact to land use would be substantial. Land uses are expected to substantially change in the short- and long-term. The action would not be consistent with the surrounding land use.

4.2.2.1 No Action Alternative

Under the No Action Alternative, the Army would not purchase any new land to construct the new facilities. Therefore there would be no effect on land use.

4.2.2.2 Alternative 1 – Cross Keys Road

Regional Geographic Setting and Location - No effects are expected on local and regional setting as a result of implementing the Proposed Action at the Alternative 1 site. Impacts on land use on the site are expected to be limited in scope to the site itself.

Site Land Use - Implementation of the Proposed Action at the Alternative 1 site would change the existing land use of the site; however, the effects would not be significant. Land use at the site is currently classified as Urban, Agriculture, and Forest (with most of the forest cleared in 2007). The Alternative 1 site would be consistent with Gloucester Township zoning for commercial development, which would allow for construction and operation of an AFRC (Lechner, 2008).

The construction of the AFRC and related facilities would remove the site area from availability for potential future use or development, and would result in a minor overall reduction in open, undeveloped space within the county.

Current and Future Development in the Region of Influence – Effects from construction and operation of the new AFRC would not be significant since the project would be compatible with township zoning. Development impacts associated with project construction within the ROI are discussed in Section 4.10 *Socioeconomics*. In general, short-term construction requirements and no net increase in

personnel living within the ROI would add minimal financial capital to the local and regional economy and would not create an additional demand for housing or businesses that provide goods and services.

4.2.2.3 Alternative 2 – Erial Road

Regional Geographic Setting and Location - No effects are expected on local and regional setting as a result of implementing the Proposed Action at the Alternative 2 site. Impacts to land use on the site are expected to be limited in scope to the site itself.

Site Land Use - Implementation of the Proposed Action at the Alternative 2 site would change the existing land use of the site; however, the effects would not be significant. Land use at the site is currently classified as Agriculture, Urban, Forest, and Wetland. Development of a new AFRC at the Alternative 2 Site would be consistent with Winslow Township zoning, which designates the parcel for minor, commercial development. Minor, commercial districts occur in those areas of the township designated in the Master Plan for the Non-Pinelands Area as areas suitable for retail or convenience shopping facilities (Winslow Township Code Book, 1979, Article VII C § 294-33). Permitted uses within a minor, commercial district include public facilities by a public agency, including an AFRC (McGlinchey, 2008; Winslow Township, 1979).

The construction of the AFRC and related facilities would remove ten acres of active farmland from agricultural use; however, the remaining acreage that would not be purchased by the Army (approximately 24 acres), would continue to be farmed. The ten acres of the site used for the new AFRC would then be removed from availability for other potential future use or development, and would result in a minor overall reduction in open, undeveloped space within the county.

Current and Future Development in the Region of Influence – Effects from construction and operation of the new AFRC would not be significant since the project would be compatible with township zoning. Development impacts associated with project construction within the ROI are discussed in Section 4.10 *Socioeconomics*. In general, short-term construction requirements and no net increase in personnel living within the ROI would add minimal financial capital to the local and regional economy and would not create an additional demand for housing or businesses that provide goods and services.

4.2.2.4 Preferred Alternative – Lakeland

Regional Geographic Setting and Location - No effects are expected on local and regional setting as a result of implementing the Proposed Action at the Preferred Alternative site. Impacts on land use on the site are expected to be limited in scope to the site itself.

Site Land Use - Implementation of the Proposed Action at the Preferred Alternative site would change the land use for a small portion of the site currently classified as Forest; however, the effects would not be significant. Siting of the new AFRC is expected to occur predominantly in the areas that are currently developed and classified as Urban, though some trees on the northwestern portion of the site would be removed. The new facilities would not be sited within any wetlands areas or within their associated 50 ft-buffers. The property is zoned as Institutional, which would allow for construction and operation of an AFRC (Lex, 2010).

Current and Future Development in the Region of Influence – Effects from construction and operation of the new AFRC would not be significant since the project would be compatible with township zoning. Development impacts associated with project construction within the ROI are discussed in Section 4.10 *Socioeconomics*. In general, short-term construction requirements and no net increase in personnel living within the ROI would add minimal financial capital to the local and regional economy and would not create an additional demand for housing or businesses that provide goods and services.

4.3 AESTHETICS AND VISUAL RESOURCES

4.3.1 Affected Environment

Geographically, the sites under consideration for the proposed Army AFRC are located in the Gloucester and Winslow Townships of Camden County, New Jersey. The general visual character of this region can be described as semi-urban, with surrounding areas maintaining a low-density residential quality representative of current and historic land uses. Residential communities in this region are interspersed with commercial developments located along major roadways, with some larger areas remaining in agricultural use or as undeveloped open space. The topography is flat to gently sloping, with land elevations ranging from 130 to 170 feet above sea level. The landscape in the vicinity of the three alternative sites is characterized by patches of mature forest which have the effect of providing visual barriers around existing development. There are no designated protected viewsheds or historic resources in the vicinity of either project site.

4.3.1.1 Alternative 1 - Cross Keys Road

The Alternative 1 site at 389 Cross Keys Road in Gloucester Township is approximately 2.2 miles from the Atlantic City expressway south of Camden. The property comprises approximately 11 acres of vacant agricultural land located in a mixed-use setting characterized by residential and commercial development. The property also contains a two-story farmhouse, garage, and storage shed in the southeast portion of the

property; the remaining portion of the property is vacant (see Figure 4-5). The structures on site are clad in wood with shingled roofs. Access to these structures is provided via a gravel driveway. An earthen driveway is also present west of the residence. Only a few mature trees exist on the site. These stands of mixed hardwood trees are located along the northern boundary and near the residential buildings in the southeast portion of the property. Vegetation in the remaining portion of the property consists of grasses approximately 0 to 3 feet in height (CH2MHill, 2009). The site is located on relatively level terrain. Elevations at the site range from 140 to 160 feet above sea level. The property is bounded by high-voltage power lines to the east, vacant forested land to the north, residential property to the west and approximately 560 feet of frontage along Cross Keys Road to the south. Also known as County Road 689, Cross Keys Road is slated to be widened into a four-lane thoroughfare by Camden County. Views of the site are available from Cross Keys Road to the south and from a trail which runs along the existing power line right-of-way to the east.

Figure 4-5. Visual Features of the Alternative 1 Site from Two Perspectives

389 Cross Keys Road

Facing East

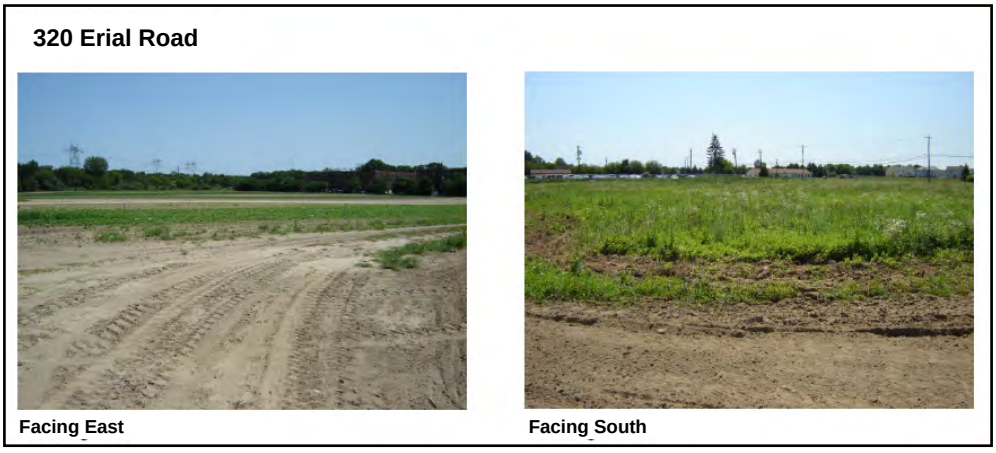
Facing Northwest

4.3.1.2 Alternative 2 - Erial Road

The Alternative 2 site located at 320 Erial Road in Winslow Township is approximately 2.7 miles southeast of the Cross Keys Road site and 2.5 miles from the Atlantic City expressway south of Camden. The entire property consists of approximately 34 acres, a large portion of which is working farm land. The terrain is flat and is zoned for commercial mixed use. Approximately two-fifths of the site is wooded along the eastern extent where an unnamed tributary to Great Egg Harbor River runs along the back portion of the property. There are two houses located adjacent to the property to the southwest, but no buildings are located on the property. Views of the site are available from Erial Road to the west (see

Figure 4-6) and from a trail which passes through the extensive wooded wetlands to the east along Great Egg Harbor River.

Figure 4-6. Visual Features of the Alternative 2 Site from Two Perspectives



4.3.1.3 Preferred Alternative – Lakeland

The Preferred Alternative site, also known as the 4-H County Fairgrounds, at the intersection of Woodbury Turnersville Road and Salina Road in Lakeland area of Gloucester Township, NJ is approximately 1.2 miles from the Atlantic City expressway south of Camden. The 12 acre site is relatively flat and includes mostly open land with a small wooded area in the northwest portion of the parcel. The site is zoned as Institutional. The property contains two 4-H barns and a snack bar in the center of the site that would need to be demolished (see Figure 4-7). Access to these structures is provided via a dirt driveway from the south and a paved driveway from the east. The site is comprised of a small stand of hardwood trees in the northwest corner of the site, several individual conifers and hardwoods along the property border to the southeast, and turfgrass throughout. The property is bounded to the north by township facilities (adjacent to the property) and Camden County health department buildings (across Woodbury-Turnersville Road), to the west and northwest by an unnamed tributary of the South Branch of Big Timber Creek and its associated wetlands and wooded area, County recreational ball fields to the south across Salina Road, and a County youth correctional facility to the east across Woodbury-Turnersville Road. Views of the site are available from Salina Road to the south and Woodbury-Turnersville Road to the northeast, and from County buildings to the north along Woodbury-Turnersville Road.

Figure 4-7. Visual Features of the Preferred Alternative Site from Six Perspectives

Intersection of Salina Road and Woodbury-Turnersville Road

Facing Southwest

Facing North

Existing parking lot

Facing Northeast

Facing North

Salina Road

Facing Northeast

Facing Northwest

4.3.2 Environmental Consequences

Aesthetics and visual resource quality is affected by visible elements including the size and height of key objects, similarity to surroundings, and visual "fit." In addition, the value of a viewshed is affected by the number and type of viewers and viewer expectations. These visual elements help to determine the potential effects of the Proposed Action on aesthetics and existing visual resources. For example, the

introduction of a large multi-story structure into an entirely natural environment could significantly impact visual resources, while the same structure introduced into a developed area might go largely unnoticed by viewers. From an aesthetics perspective, the introduction of a modern cinderblock walled facility with no windows into the center of a campus-like area with all red-brick Georgian style buildings could also have a significant effect.

To evaluate the alternatives, the following criteria have been established to define the level of impacts to visual resources:

> ***No Effect –*** No impacts to the viewshed of any historic resources and/or the aesthetic character of the installation from the proposed project.
>
> ***No Significant Effect –*** No permanent direct or indirect impacts to the existing aesthetic quality of the site and its surroundings would be expected from the proposed project. The project would not substantially degrade the visual character or quality of the site as viewed from off-site vantage points. Any temporary visual disturbances that substantially alter the character of the site would be returned to its original state following the action.
>
> ***Significant Effect –*** The proposed action would result in a substantial effect on the existing aesthetic quality of the site and its surroundings; substantially alter scenic resources, including but not limited to, trees and historic buildings; or substantially degrade the visual character or quality of the site as viewed from off-site vantage points. The effect would significantly diminish overall integrity, or would significantly alter character defining features of the site.

4.3.2.1 No Action Alternative

As no new facilities would be built under the No Action Alternative, there would be no effect to Aesthetics or Visual Resources.

4.3.2.2 Alternative 1 – Cross Keys Road

Implementing the Proposed Action at the Alternative 1 site would not have a significant effect on aesthetics and visual resources. The addition of the proposed AFRC to an area already characterized by mixed development occurring within a mosaic of forest and agricultural land uses would have negligible effects on aesthetics and visual resources in the area. The AFRC and its supporting facilities would be located on approximately 11 acres of currently vacant land. The site has been cleared and graded by the current owner with only a few remaining mature trees that may be cleared during construction along with

the demolition of the one residence and associated out-structures on the property. However, the AFRC would not conflict visually with existing and anticipated future surrounding land uses. These are expected to include a mix of service, retail and residential along Cross Keys Road, a heavily utilized transportation corridor which is programmed for expansion from a 2-lane to a 4-lane road at some point in the future.

Despite the relatively large footprint required for the AFRC structure, parking, and ancillary facilities, the proposed facility will be similar in scale to existing and proposed land uses along Cross Keys Road. As a result the proposed facility would "fit" visually with surrounding land uses. The AFRC would have an impact on aesthetics if the chosen exterior design were substantially at variance with the design and materials of nearby structures. However, the design of the AFRC building is not expected to conflict with that of existing or anticipated future development in the vicinity.

Moreover, given required AT/FP stand-off distances, the AFRC would have no significant aesthetic or visual impacts on public viewpoints from off-site areas. Existing stands of trees which bound the project site to the west would help mask the site from public vantage points from the adjacent residential development. Additional landscaping, if incorporated into the final design of the facility, would also help to lessen any visual impact that may occur.

4.3.2.3 Alternative 2 – Erial Road

Impacts to Aesthetic and Visual resources related to the AFRC and associated facilities at the Alternative 2 site would be similar to those under the Alternative 1 and would have no significant impact on aesthetic and visual resources, for the surrounding land uses are similar.

There are trees and wetlands along the northeast portion of the overall 34 acre parcel; however, the Army would not include any wetlands within their 10 acre purchase, leaving that natural environment intact. Land uses in the area include residential, agricultural and commercial/mixed-use areas. These areas would experience a minor visual impact related to the AFRC development, as a small portion of the viewshed looking from off-site would change from agricultural space to a developed site containing the AFRC and related facilities.

4.3.2.4 Preferred Alternative – Lakeland

Impacts to the aesthetic and visual resources at the Preferred Alternative site resulting from the proposed AFRC facility would not be significant. Similar to the Alternative 1 and Alternative 2 sites, the addition of the AFRC facility to an area already zoned as Institutional and characterized by County and Township government buildings would have negligible effects on the aesthetics and visual resources of the Preferred

Alternative site. The site is relatively flat and would not require significant fill or re-grading. While the proposed AFRC would have a larger footprint on the site than the three existing 4-H buildings which would be demolished, the proposed AFRC would be similar in scale and aesthetics to the surrounding County and Township buildings. Additionally, the AFRC building is not expected to conflict with the existing or future development in the surrounding area.

The amount of trees removed from the site would be minimized to the greatest extent possible, and the wetlands bordering the unnamed tributary of the South Branch of Big Timber Creek would not be impacted, maintaining their visual aesthetics. Additional landscaping, if incorporated into the final design of the facility, would also help to lessen any visual impact that may occur.

4.4 AIR QUALITY

The U.S. Environmental Protection Agency (U.S. EPA) defines ambient air in 40 CFR Part 50 as "that portion of the atmosphere, external to buildings, to which the general public has access." In compliance with the 1970 Clean Air Act (CAA) and the 1977 and 1990 Clean Air Act Amendments (CAAA), the U.S. EPA has promulgated National Ambient Air Quality Standards (NAAQS). The NAAQS were enacted for the protection of the public health and welfare, allowing for an adequate margin of safety. To date, the U.S. EPA has issued NAAQS for seven criteria pollutants: carbon monoxide (CO), sulfur dioxide (SO_2), particles with a diameter less than or equal to a nominal 10 micrometers (PM_{10}), particles with a diameter less than or equal to a nominal 2.5 micrometers ($PM_{2.5}$), ozone (O_3), nitrogen dioxide (NO_2), and lead (Pb). Areas that do not meet NAAQS are called non-attainment areas.

4.4.1 Affected Environment

Camden County, NJ is part of the Philadelphia-Wilmington-Trenton airshed and has been classified by the U.S. EPA as being in moderate non-attainment for the criteria pollutant ozone, and in non-attainment for the criteria pollutant $PM_{2.5}$.

The state and federal ambient standards for these pollutants are presented in Table 4-1.

Table 4-1. Ambient Air Quality Standards

Pollutant	Federal Standard	New Jersey Standard
Ozone (O_3): 8-Hour Average	0.075 ppm	0.08 ppm
Particulate Matter ($PM_{2.5}$):		
24-Hour	35 ug/m^3	
Annual Arithmetic Mean	15 ug/ m^3	
Suspended Particulates		
24-Hour		75 ug/m^3
Annual Average		260 ug/m^3

Sources: U.S. EPA, 2008c; NJDEP, 1991
ppm – parts per million
ug/m3 – micrograms per cubic meter

To regulate the emission levels resulting from a project, federal actions located in non-attainment areas are required to demonstrate compliance with the general conformity guidelines established in 40 CFR Part 93 Determining Conformity of Federal Actions to State or Federal Implementation Plans (the Rule). Section 93.153 of the Rule sets the applicability requirements for projects subject to the Rule through the establishment of *de minimis* levels for annual criteria pollutant emissions. These *de minimis* levels are set according to criteria pollutant non-attainment area designations. Projects below the *de minimis* levels are not subject to the Rule. Those at or above the levels are required to perform a conformity analysis as established in the Rule. The *de minimis* levels apply to direct and indirect sources of emissions that can occur during the construction and operational phases of the action.

The 99th Regional Support Command (RSC) has completed a General Conformity Rule applicability analysis to analyze any impact to air quality. Emissions have been estimated for the ozone precursor pollutants NO_x and volatile organic compounds (VOC). Annual emissions for these compounds were estimated for each of the project actions (construction and operation) to determine if they would be below or above the *de minimis* levels established in the Rule. The *de minimis* levels for moderate ozone non-attainment areas in the Ozone Transport Region (OTR) are 100 tons per year (TPY) for NO_x and 50 TPY for VOC.

On July 11, 2006 the U.S. EPA established *de minimis* levels for $PM_{2.5}$. The Final Rule established 100 TPY as the *de minimis* emission level under non-attainment for directly emitted $PM_{2.5}$ and each of the precursors that form it (SO_2, NOx, VOC, and ammonia). This 100 TPY threshold applies separately to each precursor. This means that if an action's direct or indirect emissions of $PM_{2.5}$, SO_2, NO_x, VOC, or

ammonia exceed 100 TPY, a General Conformity determination would be required. However, neither the U.S. EPA nor the state of New Jersey have found $PM_{2.5}$ problems to be caused by VOC or ammonia; therefore, ammonia is not further addressed in this EA (VOC is addressed as an ozone precursor).

Sources of NOx, VOC, $PM_{2.5}$, CO, and SO_2 associated with the proposed project would include emissions from construction and demolition equipment, fugitive dust ($PM_{2.5}$), painting of interior building surfaces, parking spaces (VOC only), and emissions from stationary units (boilers and generators).

The CEQ recently provided draft NEPA guidance on consideration of the effects of climate change and greenhouse gas emissions to explain how agencies of the Federal government should analyze the environmental effects of greenhouse gas (GHG) emissions when they describe the environmental effects of a proposed agency action. The draft guidance proposes that a quantitative air quality analysis be performed for proposed actions that have the potential to generate in excess of 25,000 metric tons of carbon dioxide (CO_2) annually. Examples of projects that could have the potential for greater GHG emission rates are the construction of a solid waste landfill, coal-fired power plant, or the authorization of a methane venting coal mine (CEQ, 2010). While the draft guidance is not yet required under NEPA, the proposed BRAC action in Camden County, NJ would not be expected to exceed the 25,000 metric ton threshold for additional air quality analyses.

In addition to evaluation of air emissions against *de minimis* levels, emissions are also evaluated for regional significance. A federal action that does not exceed the threshold emission rates of criteria pollutants may still be subject to a general conformity determination if the direct and indirect emissions from the action exceed 10-percent of the total emissions inventory for a particular criteria pollutant in a non-attainment or maintenance area. If the emissions exceed this 10-percent threshold, the federal action is considered to be a "regionally significant" activity, and thus, the general conformity rules apply.

4.4.1.1 Ambient Air Quality Conditions

Ambient air quality is monitored in Camden County by stations meeting the U.S. EPA's design criteria for State and Local Air Monitoring Stations (SLAMS) and National Air Monitoring Stations (NAMS). There are three $PM_{2.5}$ and two O_3 monitoring stations within the county. The highest and second highest values recorded at these stations from 2004 through 2008 are presented in Table 4-2.

4.4.1.2 Meteorology/Climate

Temperature is a parameter used in calculations of emissions for air quality applicability. The climate in Camden County, NJ varies seasonally. The average high temperature in Camden County, which includes the project sites, is 65 degrees Fahrenheit (°F) (TWC, n.d.).

4.4.1.3 Regional Air Pollutant Emissions Summary

The U.S. EPA calculates the Air Quality Index (AQI) for five major air pollutants regulated by the CAA: ground-level ozone, PM, CO, SO_2, and NO_2. The U.S. EPA collects data daily to determine air quality for the region, and releases it in the form of the AQI, which runs from zero to 300, with zero being no air pollution and 300 representing severely unhealthy air pollution levels.

Table 4-2. Existing Monitoring Data within Camden County, NJ

Monitoring Station	Year*				
	2004	2005	2006	2007	2008
#340070003 – Copewood & E. Davis Sts O_3	0.093/0.089	0.099/0.097	0.092/0.089	0.107/0.100	0.093/0.083
1 - $PM_{2.5}$	38.2/36.8	39.9/38.1	40.5/34.8	41.0/40.4	36.8/30.9
2 - $PM_{2.5}$	34.2/34.2	43.5/39.7	34.7/33.9	25.7/25.1	23.5/17.3
#340071001 – Ancora State Hospital O_3	0.103/0.092	0.096/0.096	0.115/0.112	0.103/0.094	0.086/0.083
#340071007 – Pennsauken Township $PM_{2.5}$	39.7/38.5	41.5/38.3	38.2/38.1	56.9/40.4	30.5/27.4

$1^{st}/2^{nd}$ highest data,
*Ozone and CO values are in ppm; PM values are in ug/m3
NAAQS: O3: 8-hour average = 0.075 ppm, $PM_{2.5}$: 24-hour average: 35 ug/m3
Source: U.S. EPA, 2008a

An AQI value between 101 and 150 indicates that air quality is unhealthy for sensitive groups who may be subject to negative health effects. Sensitive groups may include those with lung or heart disease who will be negatively affected by lower levels of ground level ozone and PM than the rest of the general public. An AQI value between 151 and 200 is considered to be unhealthy and may result in negative health effects for the general public, with more severe effects possible for those in sensitive groups. AQI values above 200 are considered to be very unhealthy (Clean Air Partners, n.d.).

According to the U.S. EPA's AQI Report for Camden County, NJ, in 2004 the County experienced 9 days where air quality was considered unhealthy for sensitive groups and 1 day considered unhealthy for the

general public. In 2005, there were 31 unhealthy days for sensitive groups and 3 unhealthy days for the general public. In 2006, the area experienced 18 days that were unhealthy for sensitive groups with 2 unhealthy days for the general public. In 2007 there were 25 days considered unhealthy for sensitive groups and 3 unhealthy days for the general public. In 2008, there were 9 days recorded as unhealthy for sensitive groups as of November 1, 2008 (U.S. EPA, 2008b).

4.4.2 Environmental Consequences

4.4.2.1 No Action Alternative

Implementation of the No Action Alternative would not change current conditions and therefore there would be no effect on the current air quality conditions in the region.

4.4.2.2 Alternative 1 – Cross Keys Road

A General Conformity Applicability Analysis was performed for the Proposed Action. The General Conformity Applicability Analysis estimated the level of potential air emissions (NO_x, VOC, SO_2, and $PM_{2.5}$) for the Proposed Action. Demolition associated with the Proposed Action at the Alternative 1 site includes the removal of a small residence on the property and would contribute negligibly to the overall air emissions of the Proposed Action. Appendix D contains a detailed description of the assumptions and methodology used to estimate the potential emissions for all demolition, construction, and future operational phases of the Proposed Action.

Table 4-3 summarizes the total emissions associated with the construction and operation phases of the Proposed Action. Construction related emissions would be temporary and only occur during the 19-month construction period for all buildings. A conservative approach was initially employed in the applicability analysis to ensure that construction scheduling would not result in higher levels of emissions than predicted. The analysis first assumed that the construction emissions for all of the buildings would occur concurrently over the same 1-year period.

Table 4-3. Summary of Annual Emissions

	Total Annual Emissions – TPY			
	NOx	**VOC**	**$PM_{2.5}$**	**SO_2**
Federal *de minimis* standards	**100**	**50**	**100**	**100**
Construction	4.763	0.627	2.624	0.782
Full Operation	0.092	0.005	0.007	0.001

In addition to *de minimis* values, actions are also evaluated for regional significance. An action is considered to be regionally significant if the annual increase in emissions would make up 10 percent or more of the available regional emission inventory. The *NJDEP State Implementation Plan (SIP) Revision for the Attainment and maintenance of the Ozone National Ambient Air Quality Standard* sets forth 2009 daily emission targets of 25.98 tons per day of VOC and 63.66 tons per day of NO_x for the Delaware Valley 8-hour ozone non-attainment area where Camden County is located (NJDEP, 2007a). The increase in annual emissions from the construction and operational activities would not make up 10 percent or more of the available regional emission target for VOC or NO_x and would not be regionally significant.

NJDEP State Implementation Plan (SIP) Revision for the Attainment and Maintenance of the Fine Particulate Matter National Ambient Air Quality Standard sets forth 2009 annual emission targets of 14,752 ton for $PM_{2.5}$, 113,690 tons for NO_x, and 26,811 tons for SO_2 for the state of New Jersey (NJDEP, 2009c). Emissions from the construction and operation of the Proposed Action would not exceed 10 percent of the emissions budget and would not be regionally significant for $PM_{2.5}$. Therefore, a full conformity determination is not required. A Record of Non-Applicability (RONA) can be found in Attachment One of Appendix D. The Alternative 1 site would not be regionally significant and air quality impacts are therefore not considered to be significant.

4.4.2.3 Alternative 2 – Erial Road

Emissions from the construction and operation of the proposed facilities at the Alternative 2 site would be expected to be the same as at the Alternative 1 site. There would be no emissions from demolition activities since no demolition is required at the Alternative 2 site. As a result, a full conformity determination is not required. A RONA can be found in Attachment One of Appendix D. Implementing the Proposed Action at the Alternative 2 site would not be regionally significant and air quality impacts would therefore not be significant.

4.4.2.4 Preferred Alternative – Lakeland

Emissions from the construction and operation of the proposed facilities at the Preferred Alternative site would be expected to be the same as at the Alternative 1 site. The demolition of the structures within the site would produce negligible emissions. As a result, a full conformity determination is not required. A RONA can be found in Attachment One of Appendix D. Implementing the Proposed Action at the Preferred Alternative site would not be regionally significant and air quality impacts would therefore not be significant.

4.5 NOISE

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

The Noise Control Act of 1972 was enacted to establish noise control standards and to regulate noise emissions from commercial products such as transportation and construction equipment. The Noise Control Act exempts noise from military weapons or equipment designated for combat use.

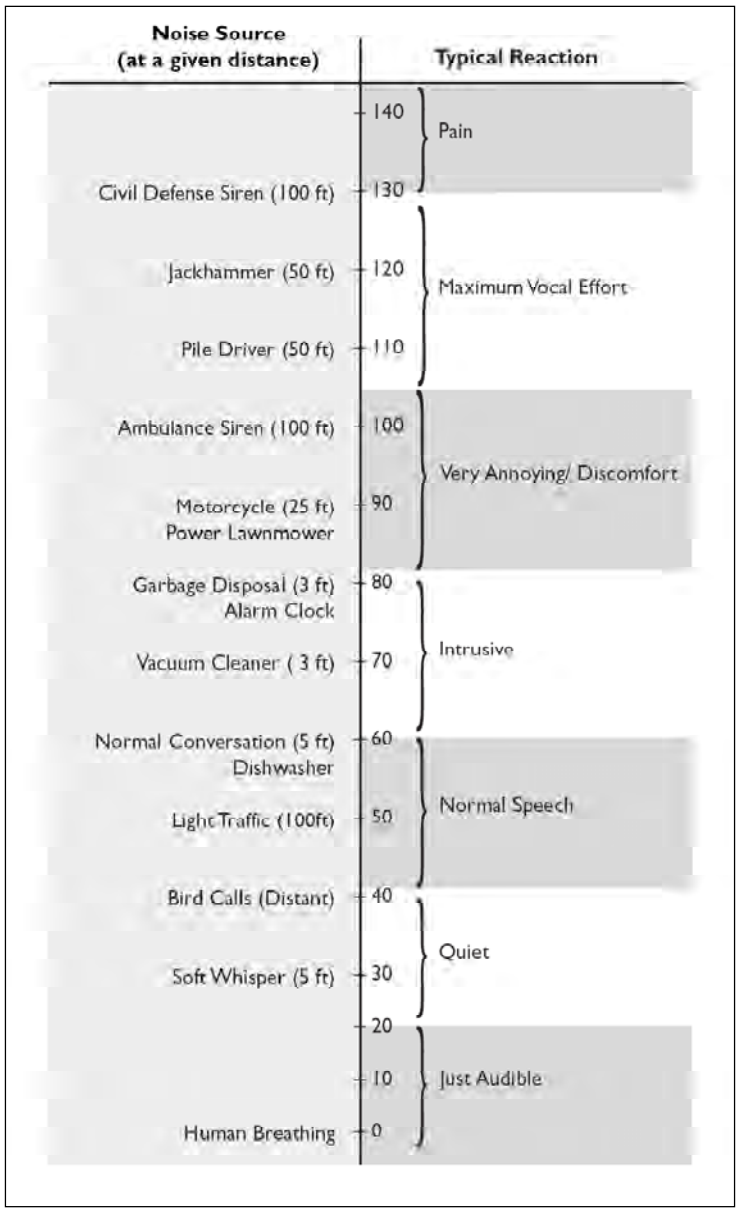
The standard measurement unit of noise is the decibel (dB), which represents the acoustical energy present. Noise levels are measured in A-weighted decibels (dBA), a logarithmic scale which approaches the sensitivity of the human ear across the frequency spectrum. A 3-dB increase is equivalent to doubling the sound pressure level, but is barely perceptible to the human ear. Figure 4-8 provides some examples of sound levels of typical noise sources and noise environments.

4.5.1 Affected Environment

Under the New Jersey Administrative Code, N.J.A.C. 7:29, Noise Control, the noise levels at residential property boundaries are limited to a continuous sound level of 65 dBA during the hours of 7:00 A.M. to 10:00 P.M and at 50 dBA from 10:00 P.M. to 7:00 A.M. Impulsive sound is limited to a maximum of 80 dBA during the hours of 7:00 A.M. to 10:00 P.M if the impulse is not repeated more than four times in any hour. During the same period, impulsive sound which repeats more than four times in any hour is limited to 50 dBA. The statutory authority of N.J.A.C. 7:29 is the Noise Control Act of 1971, N.J.S.A. 13:1G-1 et seq.

Winslow and Gloucester Townships follow N.J.A.C. 7:29, which is authorized through the Noise Control Act. The Noise Control Act also allows municipalities to adopt noise control ordinances that are more stringent than the State code. Additionally, within Winslow County, it is unlawful to perform construction or any type of construction activity or maintenance activity on property in residential areas between the hours of 8:00 p.m. and 7:00 a.m (Code of the Township of Winslow § 196-11). Gloucester Township's

Figure 4-8. Typical Noise Levels



Source: DoD, n/d.

Noise Ordinance limits continuous sound levels to 65dBA during the hours of 7:00 a.m. to 10:00 p.m. (Gloucester Township, 2009).

4.5.1.1 Alternative 1 – Cross Keys Road

The Alternative 1 site is currently vacant land containing a single private residence in the southeastern portion of the parcel. There are some single family houses adjacent to the western boundary of the site. The nearest house, off Kenwyck Court, is approximately 90 feet from the site boundary. As discussed

earlier, although the site has been cleared to a great extent, there are mature trees around the western and northern perimeter of the parcel and around the southeast corner of the parcel. The area to the north of site is forested. The site is bounded on south-east by Cross Keys Road. Existing noise levels at the site are typical of an area surrounded by a residential area, undeveloped land and a busy two-lane road.

4.5.1.2 Alternative 2 – Erial Road

The Alternative 2 site is located at 320 Erial Road, Sicklerville and is currently a working farmland with no buildings on-site. There is a PSE&G overhead electrical transmission line easement over the rear of the property, opposite the Erial Road Frontage. There is a small area of residential housing to the northwest of the site and a large apartment complex to the southeast. To the east of the site there is a wooded and cleared area. There is a children's learning center to the southwest of the site; however, it is more than 750 feet from the boundary of the site. The existing noise levels at the site are typical of an area surrounded by residential area.

4.5.1.3 Preferred Alternative – Lakeland

The Preferred Alternative site is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ and is currently the location of the 4-H County Fairgrounds. The 12 acre site includes three 4-H related structures (two barns and a snack bar) that would be demolished to accommodate the proposed actions. Camden County health and government services offices are located directly northeast of the site. There is a retirement community located approximately 400 feet northeast of the site and a Camden County youth correctional center directly east of the site across Woodbury-Turnersville Road. County recreational fields and town barn buildings are located south of the site across Salina Road. The unnamed tributary of the South Branch of Big Timber Creek to the west of the site is surrounded by a wooded area. Existing noise levels at the site are typical of an area including county buildings, institutional facilities, and recreational areas.

4.5.1.4 Noise from Construction and Demolition

Instances of increased noise are expected during the construction and demolition phases associated with the proposed project. Measures that serve to limit noise during construction and demolition include limiting activity at project sites to daytime hours; limiting truck traffic ingress/egress at access gates to daytime hours; promoting awareness that producing prominent discrete tones and periodic noises (e.g., excessive dump truck gate banging) should be avoided as much as possible; requiring that work crews seek pre-approval for any weekend activities, or activities outside of daytime hours; and employing noise-controlled construction equipment to the maximum extent possible. Noise levels of typical construction

equipment range from approximately 65 dBA to 95 dBA at 50 feet from the source with an average of 89 dBA (FTA, 2006). Typical construction equipment and operation noise levels are presented in Table 4-4.

High levels of noise can also affect the health of construction/demolition workers. Application of federal Occupational Safety and Health Administration (OSHA) standards for occupational noise exposure associated with construction (29 CFR 1926.52) is required.

4.5.1.5 Noise from Facility and Vehicle Operations

Once facilities are constructed, noise can be generated from facility operations and the vehicles associated with these facilities. Aside from negligible heating, ventilation, and air conditioning (HVAC) related noise, the majority of military related facilities do not generate high levels of noise themselves. Some industrial-related facilities may produce noise, and during power outages, operation of emergency generators could cause minor, short-term noise impacts. Most noise is usually created by vehicles associated with these facilities, including organizational vehicles used for training and operations, government and private delivery vehicles, commuter shuttles or buses, and personal vehicles used for commuting purposes. The noise impact created by facility and vehicle operations; however, is rarely considered significant.

Table 4-4. Typical Noise Levels (dBA) of Typical Construction Equipment

Equipment	Typical Noise Level (dBA) 50 ft from Source
Air Compressor	81
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	81
Grader	85
Jack Hammer	88
Loader	85
Paver	89
Pneumatic Tool	85
Pump	76

Equipment	Typical Noise Level (dBA) 50 ft from Source
Roller	74
Saw	76
Scraper	89
Shovel	82
Truck	88

Source: FTA, 2006

4.5.2 Environmental Consequences

The following criteria have been developed to assess noise impacts:

No Effect – Natural sounds would prevail; noise generated by construction and operation of the facility would be infrequent or absent, mostly immeasurable.

Not Significant Effect – Noise levels would exceed natural sounds, as described under no effect, but would not exceed applicable noise standards.

Significant Effect – Noise levels would exceed applicable noise standards on a temporary, short-term, or permanent basis or for a prolonged period of time.

4.5.2.1 No Action Alternative

No effects would be expected. Implementation of the No Action Alternative would not alter the existing noise at either of the two alternative sites.

4.5.2.2 Alternative 1 – Cross Keys Road

The proposed AFRC facilities would be constructed on a vacant land surrounded by undeveloped land and residential areas. Cross Keys Road, which bounds the site to the south, is a busy two-lane road which is programmed for expansion to a 4-lane road at some point in the future.

Noise From Construction and Demolition – Construction and demolition activities would involve the use of heavy equipment such as backhoes and trucks. These activities typically generate a noise level of 85 dBA at 50 feet from the source. As a general rule for estimating noise emission, sound from a stationary source will diminish approximately 6 dBA with each doubling of distance. For example, if noise from a source reaches 75 dBA at 25 feet, it will be 69 dBA at 50 feet and 63 dBA at 100 feet, and so on. AT/FP set back requirements for the project site would mean that heavy construction equipment would not need to operate in areas along the property boundary immediately adjacent to residential areas,

providing distance across which noise levels would attenuate to levels that would comply with state Noise Control regulations. Complying with noise regulations for hours of construction activity and employing best management practices such as using noise-controlled construction equipment to the greatest extent possible would also minimize impacts of construction noise. Upon completion of construction and demolition activities, noise levels would be expected to return to normal, ambient levels for the area. Therefore, it is anticipated that impacts would not be significant.

Compliance with the OSHA standards for occupational noise exposure associated with construction (29 CFR 1926.52) would address the construction workers hearing protection.

Noise from Facility Operations - Day-to-day operations after construction of the new AFRC and associated facilities are not expected to increase by more than negligible levels as there would be no outdoor training exercises. On drill weekends there would be some routine vehicle maintenance (e.g. oil changes etc.) performed as part of the OMS that would require military vehicles to be started up and moved from the MEP to the OMS; however, the Army would comply with the noise ordinances to ensure that neighboring areas are not disturbed.

4.5.2.3 Alternative 2 – Erial Road

Noise From Construction and Demolition – Noise levels generated during construction activities at the Alternative 2 site would be similar to those at the Alternative 1 site. Similar to Alternative 1, construction noise impacts to the residential properties to the northwest and southeast would be attenuated due to AT/FP setback distances that would not require heavy construction in areas immediately adjacent to the property boundary in those areas, providing distance over which construction noise would attenuate to levels within compliance of noise regulations. Complying with noise regulations for hours of construction activity and employing best management practices such as using noise-controlled construction equipment to the greatest extent possible would also minimize impacts of construction noise. The children's learning center to the southwest is more than 750 feet from the boundary of the site; therefore, the distance would attenuate the noise to the receptor to levels that would adhere to the Winslow Township's Noise ordinance. Therefore, it is anticipated that the impacts would not be significant.

Noise from Facility Operations – Noise levels generated during day-to-day operations at the Alternative 2 site would be similar to those at the Alternative 1 site and the Army would comply with local noise ordinances to ensure that impacts are not significant.

4.5.2.4 Preferred Alternative – Lakeland

Noise From Construction and Demolition – Noise resulting from the proposed construction of the AFRC at the Preferred Alternative site would be similar to those at the Alternative 1 and 2 sites. The retirement community located approximately 400 feet north of the site along Woodbury-Turnersville Road is the only sensitive receptor in the vicinity of the Preferred Alternative site. Construction noise would be attenuated by the distance between the retirement community and the proposed AFRC to levels that would adhere to the Gloucester Township's Noise ordinance; therefore, impacts from noise would not be significant. Complying with noise regulations for hours during which construction activities can take place and by employing best management practices such as utilizing noise-controlled construction equipment to the maximum extent possible would also minimize the impact of construction noise. Therefore, it is anticipated that the impacts would not be significant.

Noise from Facility Operations – Noise level generated during day-to-day operations at the Preferred Alternative site would be similar to those at the Alternative 1 and 2 sites. The Army would comply with noise ordinances to ensure that impacts are not significant.

4.6 GEOLOGY AND SOILS

4.6.1 Affected Environment

Geological resources consist of all bedrock and soil materials within an area. Geologic factors such as soil stability and seismic properties influence the stability of structures. Soil, in general, refers to unconsolidated earthen materials overlying bedrock and other parent material. Soil structure, elasticity, strength, shrink-swell potential, and erodibility all determine the ability for the ground to support structures and facilities. Soils typically are described in terms of their type, slope, physical characteristics, and relative compatibility or limitations with regard to particular construction activities and types of land use. Topography consists of the physiographic, or surface, features of an area and is usually described with respect to elevation, slope, aspect, and landforms. Long-term geological, erosional, and depositional processes typically influence topographic relief of an area.

This section describes the geology, topography, and soils occurring in the proposed project areas. The assessment of the existing geology, topography, and soils is based on U.S. Geological Survey (USGS) topographic maps and the Natural Resources Conservation Service Soil Survey for Frederick County.

4.6.1.1 Geologic and Topographic Conditions

Camden County, NJ is located within the Coastal Plain. The Coastal Plain is made up of sedimentary rocks, deposited mostly in a marine environment, that were later uplifted and now tilt seaward (Stanford 1998). Surficial materials found within the Coastal Plain formations in the proposed project areas in Camden County, New Jersey consist mostly of fine to coarse sand, with minor inclusions of silt and pebble gravel. Gravel occurs as thin beds within the sand, and at the base of the deposit. Sand is chiefly quartz, with some glauconitic, and a trace of weathered feldspar and chert. The bedrock underlying the Coastal Plain surficial layers of Alternative 1(Cross Keys Road) and Alternative 2 (Erial Road) is of Middle Miocene origin and consists of the Cohansey Formation. The Cohansey Formation is comprised of medium grained sand and unweathered clay deposited between 13.7 and 11.6 million years ago (Dalton et al., 1999). The bedrock underlying the Preferred Alternative (Lakeland) is of the lower member of the Kirkwood Formation. The lower member of the Kirkwood Formation is comprised primarily of silty clay and medium grained sand deposited between 23.0 and 20.0 million years ago (Dalton et al., 1999). Iron sulfide materials in the Kirkwood Formation can lead to acid forming (acid sulfate) soils when exposed to oxygen.

Due to the recent tree clearing and grading that occurred in 2007 on the Alternative 1 site, the overall topography of this site is relatively flat. Due to the ongoing farming activities, the majority of the Alternative 2 site is relatively flat. Areas of this site that are not relatively flat (i.e. those associated with the unnamed tributary to the Great Egg Harbor River) are not under consideration for purchase by the Army. The Preferred Alternative site is also relatively flat. The only areas in the vicinity that are not flat are the sloped banks of the unnamed tributary to the South Branch of Big Timber Creek; however, these areas are not included in the project boundary that the Army would purchase if this site is selected for implementing the Proposed Action.

4.6.1.2 Soils

Soils found within the three alternative project sites are listed and described in Table 4-5 (USDA, 2008). Soil boring data (Underwood Engineering Company, 2010) for the Preferred Alternative Site suggest that between three and nine inches of topsoil are present throughout the pervious area on the site, and that approximately six inches of asphalt are present throughout the impervious parking area on the site. Both topsoil and asphalt are directly underlain by silty sand (Unified Soil Classification System (USCS)) or sand (USCS) for approximately five feet. The USCS textures correspond to NRCS texture classes sandy loam and sand, respectively.

Table 4-5. Soil Mapping Units Found at the Alternative Sites

Soil Mapping Unit	Site	Soil Characteristics	Hydric Soil [1]	Important Farmlands[2]
Atsion sand	Alternative 1 and Alternative 2	The Atsion component is found on slopes from 0 to 2 percent on flats on coastal plains. The parent material consists of sandy fluviomarine deposits. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is poorly drained. Water movement in the most restrictive layer is high. Available water to a depth of 60 inches is low. Shrink-swell potential is low. This soil is not flooded or ponded. Organic matter content in the surface horizon is about 85 percent.	This soil meets hydric criteria	Areas with this type of soil mapping unit are considered Farmlands of unique importance
Buddtown-Deptford fine sandy loams, 0-2 percent slopes	Preferred Alternative	This mapping unit is found on 0-2 percent slopes on linear flats within the Coastal Plain. The parent material consists of loamy eolian deposits and loamy fluviomarine deposits. Depth to a root restrictive layer is greater than 80 inches. The natural drainage class is somewhat poorly drained to moderately well drained. Water movement in the most restrictive layer moderately high to high. Available water capacity is moderate to high. Shrink-swell potential is low. The soil is not flooded or ponded. Saturation may be present between 12 and 42 inches. Organic matter in the surface horizon is about 2 percent.	This soil meets hydric criteria.	Areas with this type of soil mapping unit are considered prime farmland.
Downer loamy sand 0- 5 percent slopes	Alternative 1 and Alternative 2	The Downer component is found on 0 to 5 percent slopes, on low hills, knolls, coastal plains. The parent material consists of loamy fluviomarine deposits and/or gravelly fluviomarine deposits. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is moderate. Shrink-swell potential is low. This soil is not flooded or ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 1 percent.	This soil does not meet hydric criteria	Areas with this type of soil mapping unit are considered Farmland of statewide importance
Downer loamy sand, 5 to 10 percent slopes	Alternative 2	The Downer component is found on 5 to 10 percent slopes, on coastal plains, low hills, knolls. The parent material consists of loamy fluviomarine deposits and/or gravelly fluviomarine deposits. Depth to a root restrictive layer is greater than 60	This soil does not meet hydric	Areas with this type of soil mapping unit are considered Farmlands of statewide importance

Soil Mapping Unit	Site	Soil Characteristics	Hydric Soil [1]	Important Farmlands[2]
		inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is moderate. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 1 percent.	criteria.	
Downer sandy loam, 0 to 2 percent slopes	Alternative 2	The Downer component is found on slopes 0 to 2 percent on knolls, low hills in the coastal plain. The parent material consists of loamy fluviomarine deposits and/or gravelly fluviomarine deposits. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is moderate. Shrink-swell potential is low. This soil is not flooded. It is no t ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 2 percent.	This soil does not meet hydric criteria.	All areas with this soil mapping unit are considered Prime Farmlands.
Fallsington sandy loam, 0 to 2 percent slopes	Alternative 2	The Fallsington component is found on slopes are 0 to 2 percent on flats on coastal plains. The parent material consists of loamy fluviomarine deposits. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is poorly drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is moderate. Shrink-swell potential is low. This soil is not flooded. It is not ponded. Organic matter content in the surface horizon is about 85 percent.	This soil meets hydric criteria.	Areas with this type of soil mapping unit are considered Farmlands of statewide importance
Fluvaquents, loamy, 0-3 percent slopes	Preferred Alternative	The Fluvaquent component is found on 0-3 percent slopes on toeslopes with thin flood plains. The parent material consists of recent alluvium. Depth to a root restrictive layer is greater than 80 inches. The natural drainage class is somewhat poorly drained. Water movement through the most restrictive layer is moderately high to high. Shrink-swell potential is low. The soil is frequently ponded and flooded. Organic matter content in the surface horizon is	This soil meets hydric criteria.	Areas with this type of soil mapping unit are not considered important farmland soils.

Soil Mapping Unit	Site	Soil Characteristics	Hydric Soil [1]	Important Farmlands[2]
		about 3 percent.		
Lakewood fine sand	Alternative 1 and Alternative 2	The Lakewood component is found on slopes from 0 to 5 percent on dunes and flats on coastal plains. The parent material consists of sandy fluviomarine deposits. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is excessively drained. Water movement in the most restrictive layer is high. Available water to a depth of 60 inches is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. Organic matter content in the surface horizon is about 2 percent.	This soil does not meet hydric criteria.	Areas with this type of soil mapping unit are not considered important farmland soils.
Manahawkin muck, 0 to 2 percent slopes,	Alternative 2	The Manahawkin is frequently flooded and found on slopes ranging from 0 to 2 percent. This component is on flood plains, swamps on coastal plains. The parent material consists of organic, woody material over sandy alluvium. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is very poorly drained. Water movement in the most restrictive layer is high. Available water to a depth of 60 inches is very high. Shrink-swell potential is low. This soil is frequently flooded. It is frequently ponded. A seasonal zone of water saturation is at 0 inches during January, February, March, April. Organic matter content in the surface horizon is about 55 percent.	This soil meets hydric criteria.	Areas with this type of soil mapping unit are considered Farmlands of unique importance
Westphalia-Buddtown-Urban complex, 0-5 percent slopes	Preferred Alternative	This mapping unit is found on low hills and depressions on slopes between 0 and 5 percent. The parent material consists of loamy eolian deposits and loamy fluviomarine deposits. Portions of this mapping unit are covered by urban materials or are underlain by disturbed soil material. Depth to a root restrictive layer is greater than 80 inches. The natural drainage class is moderately well drained to well drained. The movement of water through the most limiting horizon is moderately high to high. The soil is not ponded or flooded. Shrink-swell potential is low. Organic matter content in the surface horizon is about 2 percent.	This soil does not meet hydric criteria.	Areas with this type of soil mapping unit are not considered important farmland soils.
Woodstown and Galloway loamy sands, 0	Alternative 2	This mapping unit is found on slopes from 0 to 5 percent on low hills on coastal plains. The parent material consists of old	This soil does	Areas with this type of soil mapping unit are considered Farmlands

Soil Mapping Unit	Site	Soil Characteristics	Hydric Soil [1]	Important Farmlands[2]
to 5 percent slope		alluvium and/or sandy marine deposits. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is moderately well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is moderate. Shrink-swell potential is low. This soil is not flooded. It is not ponded. Organic matter content in the surface horizon is about 2 percent.	not meet hydric criteria.	of statewide importance

[1] Hydric Soils - Those soils that are sufficiently wet in the upper part to develop anaerobic conditions during the growing season. Considered one of the three indicators of the presence of wetlands (i.e., hydric soils, hydrophytic vegetation, and hydrology).

[2] Important farmlands consist of prime farmland, unique farmland, and farmland of statewide or local importance. This list does not constitute a recommendation for a particular land use. In an effort to identify the extent and location of important farmlands, the Natural Resources Conservation Service, in cooperation with other interested Federal, State, and local government organizations, has inventoried land that can be used for the production of the Nation's food supply (USDA, 2008).

"Prime farmland" is of major importance in meeting the Nation's short- and long-range needs for food and fiber. Because the supply of high-quality farmland is limited, the U.S. Department of Agriculture recognizes that responsible levels of government, as well as individuals, should encourage and facilitate the wise use of our Nation's prime farmland. Prime farmland, as defined by the U.S. Department of Agriculture, is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses (USDA, 2008).

"Unique farmland" is land other than prime farmland that is used for the production of specific high-value food and fiber crops, such as citrus, tree nuts, olives, cranberries, and other fruits and vegetables. It has the special combination of soil quality, growing season, moisture supply, temperature, humidity, air drainage, elevation, and aspect needed for the soil to economically produce sustainable high yields of these crops when properly managed (USDA, 2008).

In some areas, land that does not meet the criteria for prime or unique farmland is considered to be "farmland of statewide importance" for the production of food, feed, fiber, forage, and oilseed crops. The criteria for defining and delineating farmland of statewide importance are determined by the appropriate State agencies. Generally, this land includes areas of soils that nearly meet the requirements for prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Some areas may produce as high a yield as prime farmland if conditions are favorable (USDA, 2008).

Acid-Producing Soil – Geologic deposits that contain iron sulfide minerals such as pyrite or marcasite are called "acid producing soil deposits" (NJDEP, 2008e). Upon exposure to oxygen from either air or surface water, the sulfides present become oxidized and transform into iron oxides. This process, called sulfuricization (Fanning and Fanning, 1989) produces sulfuric acid as a byproduct. The sulfuric acid

increases the solubility of metals to the extent that the metals can become toxic to aquatic life or land vegetation, or can reach concentrations undesirable in sources of potable water supply (NJDEP, 2008e). Within the NJ Coastal Plain the NJDEP indicates that the following geologic formations sometimes contain substantial acid producing soil deposits: Englishtown Formation, Kirkwood Formation, Magothy Formation, Marshalltown Formation, Merchantville Formation, Navesink Formation, Raritan Formation, Sandy Hook Member of Red Bank Formation, and the Woodbury Formation. For regulatory purposes, the NJDEP assumes that all areas underlain by these geologic formations also contain acid producing soil deposits, and in areas adjacent to water bodies impose a 150-foot riparian zone buffer which restricts the type and amount of disturbance that can occur within the buffer area (NJDEP, 2010b and 2008e). To disturb soils or vegetation for an allowable, regulated activity within the 150-foot buffer requires a permit issued under the NJ Flood Hazard Area Control Act Rules N.J.A.C.7:13 (NJDEP, 2007d). The regulations do allow for soil testing to be conducted by a proponent to refute the presumed presence of acid-producing soils. If soil testing conducted in accordance with NJDEP methodologies (NJDEP, 2008e) show that no acid-producing soils are present, the NJDEP will accept the testing data and confirm that a 150-foot riparian buffer associated with acid-producing soils will not apply to the site or project (NJDEP, 2008e). However, a 50-foot riparian buffer would still be established along the waters per the Flood Hazard Area Control Act rules at N.J.A.C. 7:13-4.1(c)3 and would require a permit to disturb soils or vegetation within this buffer (NJDEP, 2007d).

As noted above under *Geologic and Topographic Conditions* the Alternative 1 and Alternative 2 sites are underlain by the Cohansey Formation which is not indicative of acid producing soil deposits being present. However, the Preferred Alternative is underlain by the lower member of the Kirkwood Formation which is indicative of the presence of acid-producing soil, (NJDEP, 2008e). Therefore, acid-producing soils are presumed to be present on the Preferred Alternative site by the NJDEP unless otherwise proven through soil testing (NJDEP, 2010b and 2008e).

4.6.1.3 Prime Farmland

The Farmland Protection Policy Act (FPPA) was passed in order to minimize the amount of land irreversibly converted from farmland due to Federal actions. Prime farmland, as defined by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. It could be cultivated land, pastureland, forestland, or other land, but it is not urban or built-up land or water areas even if it contains the above characteristics (NRCS, 2008). The standards applied by the NRCS are valuable as a tool for assessing the value of the soil

resource and the impact of a project. Land that is zoned for commercial development does not qualify as Prime Farmland and is therefore not subject to the FPPA.

4.6.2 Environmental Consequences

To assess the magnitude of impacts to geology, topography, and soils in the area of the project sites, the following impact thresholds were used.

No Effect - Geology, topography, or soils would not be impacted or the impact to these resources would be below or at the lower levels of detection. Any impacts would be slight.

No Significant Effect - Impacts to geology, topography, or soils would be detectable. Impacts to undisturbed areas would be proportionally small to the site.

Significant - Impacts on geology, topography, or soils would be readily apparent and result in a change to the character of the resource over a relatively wide area. Mitigation measures would be necessary to offset adverse impacts and may or may not be successful.

4.6.2.1 No Action Alternative

No effects would be expected. Implementation of the No Action Alternative would result in no changes to the sites being considered under the proposed action. There would be no new construction or demolition, and as a result, there would be no impacts to geology, topography, or soils.

4.6.2.2 Alternative 1 – Cross Keys Road

Geologic and Topographic Conditions – No significant adverse impacts to geologic or topographic conditions would be expected. This site is primarily flat or gently rolling terrain, and would likely require only minor leveling and grading. Considerable alterations of the general topographic character of the site would not occur.

Soils – While approximately 3.7 acres of new development would occur from the construction of the AFRC, OMS, unheated-unit storage building, and associated parking and access roads, no significant adverse impacts to soils would be expected. Soils found within the footprints of the proposed new construction would likely be affected by activities associated with the overall preparation and minor leveling and grading of the site. Vegetative cover would be removed, soils would be compacted, and soil layer structure would be disturbed and modified. Soil productivity, (i.e. the capacity of the soil to produce vegetative biomass), would decline in disturbed areas and be completely eliminated for those areas within the footprint of building structures or parking facilities. These effects would not be

considered significant, given the fact that the area where development would occur has been altered by a previous pig farm operation and the recent clearing of trees and grading of the site by the current land owner.

Disturbed areas outside of the building and parking facility footprints would be reseeded following construction activities, and soil productivity on these sites would return. Soil erosion and sediment production would be minimized for all construction operations as a result of following an approved sediment and erosion control plan. All sites would be regraded and revegetated (as necessary) following construction activities, and soil erosion and sediment control measures would be included in site plans to minimize long term erosion and sediment production at each site.

The majority of the soils underlying the proposed site have somewhat limited shrink-swell potential, indicating that there would be low potential for uneven or problematic settling of any newly constructed buildings or parking facilities. While hydric soils do occur within the project area, these soils are found in the northern third of the project area, outside of where development would occur.

No impacts to acid-producing soils would be expected as the Alternative 1 site does not contain geological formations that indicate the presence of acid-producing soils.

Prime Farmland – No impacts to prime farmlands would be expected. Although the site contains soils that are considered farmlands of unique importance and farmland of statewide importance, the project site is zoned commercial and therefore is not subject to the FPPA. The Proposed Action also does not remove prime farmland from the prime farmland inventory as the property has already been removed by local land use planning and zoning.

4.6.2.3 Alternative 2 – Erial Road

Geologic and Topographic Conditions – No significant adverse impacts to geologic or topographic conditions would be expected. This alternative site is primarily flat and would likely require only minor leveling and grading. Considerable alterations of the general topographic character of the site would not occur.

Soils – Impacts to soils would be similar to those described under Alternative 1. Like Alternative 1, approximately 3.7 acres of new development would occur from the construction of the AFRC, OMS, unheated-unit storage building, and associated parking and access roads. No significant impacts to soils would be expected. Soils found within the footprints of the proposed new construction would likely be affected by activities associated with the overall preparation and minor leveling and grading of the site.

Vegetative cover would be removed, soils would be compacted, and soil layer structure would be disturbed and modified. Soil productivity, (i.e. the capacity of the soil to produce vegetative biomass), would decline in disturbed areas and be completely eliminated for those areas within the footprint of building structures or parking facilities. These effects would not be considered significant, given the fact that the area to be disturbed would be proportionally small, when compared to the surrounding rural nature of the surrounding area.

Disturbed areas outside of the building and parking facility footprints would be reseeded following construction activities, and soil productivity on these sites would return. Soil erosion and sediment production would be minimized for all construction operations as a result of following an approved sediment and erosion control plan. All sites would be regraded and revegetated (as necessary) following construction activities, and soil erosion and sediment control measures would be included in site plans to minimize long term erosion and sediment production at each site.

The majority of the soils underlying this proposed site have somewhat limited shrink-swell potential, indicating that there would be low potential for uneven or problematic settling of any newly constructed buildings or parking facilities. While hydric soils do occur within the project area, these soils are found in the northern third of the project area, outside of where development would occur.

No impacts to acid-producing soils would be expected as the Alternative 2 site does not contain geological surface formations that indicate the presence of acid-producing soils.

Prime Farmland – No impacts to prime farmlands would be expected. Although the site contains soils that are considered prime farmlands, farmlands of unique importance, and farmland of statewide importance, the project site is zoned commercial and therefore is not subject to the FPPA. The Proposed Action also does not remove prime farmland from the prime farmland inventory as the property has already been removed by local land use planning and zoning.

4.6.2.4 Preferred Alternative – Lakeland

Geologic and Topographic Conditions – No significant adverse impacts to geologic or topographic conditions would be expected. This alternative site is primarily flat and would likely require only minor leveling and grading. Considerable alterations of the general topographic character of the site would not occur.

Soils – Impacts to soils would be similar to those described under Alternatives 1 and 2 and include impacts from demolition activities. Approximately 3.9 acres of new development would occur on this

site from the construction of the AFRC, OMS, unheated-unit storage building, and associated parking and access roads. The area of impervious surface would increase from the existing 2.4 acres to the proposed 3.9 acres. The additional 1.5 acres of proposed impervious surface is proportionally small to the site, thus no significant impacts to soils would be expected.

Demolition activities could include grading, excavation, placement of fill, compaction, mixing, and augmentation, Short-term effects could result from erosion and associated sedimentation where vegetative cover is removed during demolition. Short-term, adverse impacts to soils occurring from the demolition activities would be minimized by proper construction management and planning. Disturbed areas outside of the demolition footprint that would not have new facilities constructed in its place would be regarded and revegated as necessary.

Soils found within the footprints of the proposed new construction would likely be affected by activities associated with the overall preparation and minor leveling and grading of the site. Vegetative cover would be removed, soils would be compacted via proofrolling and densification (Underwood Engineering Company, 2010), and soil layer structure would be disturbed and modified. Soil productivity, (i.e. the capacity of the soil to produce vegetative biomass), would decline in disturbed areas and be completely eliminated for those areas within the footprint of building structures or parking facilities. These effects would not be considered significant, given the fact that the area to be disturbed would be proportionally small.

Disturbed areas outside of the building and parking facility footprints would be reseeded following construction activities, and soil productivity in these areas would return. Soil erosion and sediment production would be minimized for all construction operations as a result of following an approved sediment and erosion control plan. Areas would be regraded and revegetated (as necessary) following construction activities, and soil erosion and sediment control measures would be included in site plans to minimize long term erosion and sediment production at the site.

The majority of the soils underlying the proposed site have somewhat limited shrink-swell potential, indicating that there would be low potential for uneven or problematic settling of any newly constructed buildings or parking facilities. While hydric soils do occur within the project area, these soils are found in the northwestern corner of the project area, outside of where development would occur.

Because the Preferred Alternative site is presumed to contain acid producing soils by the NJDEP, a 150-foot riparian zone buffer is associated with the unnamed tributary of the South Branch of Big Timber Creek. This buffer encroaches upon the project site and could impact the construction of facilities on the

site. Therefore, the Army is conducting soil testing in accordance with the methods stipulated by the NJDEP (NJDEP, 2008e) to verify if acid producing soils are actually present. The results of the testing are currently not available. If testing indicates that acid producing soils are not present, construction activities would have no significant impact on soils. In addition, the 150-foot riparian buffer would revert to a 50-foot riparian buffer (NJDEP, 2007d and 2008e). The Army would avoid the 50-foot riparian buffer to the maximum extent practicable. However, should the proposed project disturb any portion of the 50-foot riparian buffer, the Army would go through the necessary permitting process to obtain a permit from the NJDEP under the Flood Hazard Area Control Act.

If testing confirms the presumption that acid producing soils are present, the 150-foot riparian buffer would remain intact. Disturbing the acid producing soils through construction activities would expose them to air causing them to go through the sulfuricization process, resulting in significant impacts to the soils. However, to mitigate impacts to the soils, the Army would commit to employing the mitigation measures as described in the draft Technical Manual for Flood Hazard Area Control Act Rules (Section 7.5 General Mitigation Standards, Section 7.6 Mitigation Procedures Along Channels, and Section 7.7 Disposal of Acid Producing Soil Deposits) (NJDEP, 2008e). The Army would also go through the necessary permitting process to obtain a permit from the NJDEP under the Flood Hazard Area Control Act to conduct allowable, regulated activities in the 150-foot riparian zone. To obtain a permit the Army may have to reengineer the design of the facilities on the site to adjust what is constructed in the buffer. Meeting NJDEP permit requirements and implementing the required soil mitigation measures stipulated by the NJDEP would result in no significant impacts to soils or surface waters. If acid producing soils are present and the Army is not able to reengineer the design of the facilities in a manner sufficient enough to meet NJDEP permitting requirements, the Army would not be able to construct the facilities on this site, resulting in no impacts to soils on this site.

Prime Farmland – No impacts to prime farmlands would be expected. Although the site contains soils that are considered prime farmland, the project site is zoned institutional and therefore is not subject to the FPPA. The Proposed Action also does not remove prime farmland from the prime farmland inventory as the property has already been removed by local land use planning and zoning.

4.7 WATER RESOURCES

4.7.1 Affected Environment

The ROI is defined as nearby waters and wetlands within Camden County.

4.7.1.1 Surface Water/Wetlands

Alternative 1 – Cross Keys Road

No natural surface water bodies (ponds or streams) exist on the Alternative 1 site. The nearest water feature is an unnamed tributary of Great Egg Harbor River, which is approximately 1000 feet to the south of the site across Cross Keys Road (see Figure 4-9). The site is nearly level and slopes gently to the southeast. No known drainage concerns were noted during site visits for the ASIV report or the Phase I Environmental Site Assessment and no evidence of wetlands was noted (USACE, 2008 and U.S. Army, 2008c). Per the NJDEPs "Wetlands of Camden County" GIS data, there are no mapped wetlands located on the property (NJDEP, 1986). The nearest wetlands are associated with the unnamed tributary to the Great Egg Harbor River approximately 1,000 feet to the south of the site across Cross Keys Road.

Alternative 2 – Erial Road

An unnamed tributary of Great Egg Harbor River crosses the northern and eastern portions of the property (see Figure 4-10). This site is nearly level and slopes gently to the northeast. No known drainage concerns were noted during site visits for the ASIV report (USACE, 2008). New Jersey has developed Surface Water Quality Standards that establish designated uses, classify streams based on uses, designate anti-degradation categories, and develop water quality criteria to protect those uses. In addition, the standards specify general, technical, and interstate policies, and policies pertaining to establishment of water quality-based effluent limitations. The highest quality waters in NJ are designated "Outstanding National Resource Waters" (ONRW). These include some waters in National and State Parks, Wildlife Refuges, and "waters of exceptional recreational or ecological significance". All remaining waters are categorized as FW2. The particular stream on the Erial Road property is further classified as a FW2-NT (Non-trout waters) which is not considered suitable for trout, but may be suitable for many other fish species (NJAC, 2008). This stream is also considered a Category Two (C2) stream with regards to anti-degradation designation. Water quality changes are allowed provided that they are in the range of changes permissible with existing stream uses, and that degradation is necessary to accommodate "important economic or social development" (NJDEP, 2008b).

Per the NJDEPs "Wetlands of Camden County" GIS data, there are forested wetlands located on the northern and eastern portion of the property, adjacent to the unnamed tributary of Great Egg Harbor River. Certain wetlands are federally protected as a subset of "waters of the United States" under Section 404 of the CWA. The USACE defines wetlands as "those areas that are inundated or saturated with

Figure 4-9. Water Resources in the Vicinity of the Alternative 1 Site

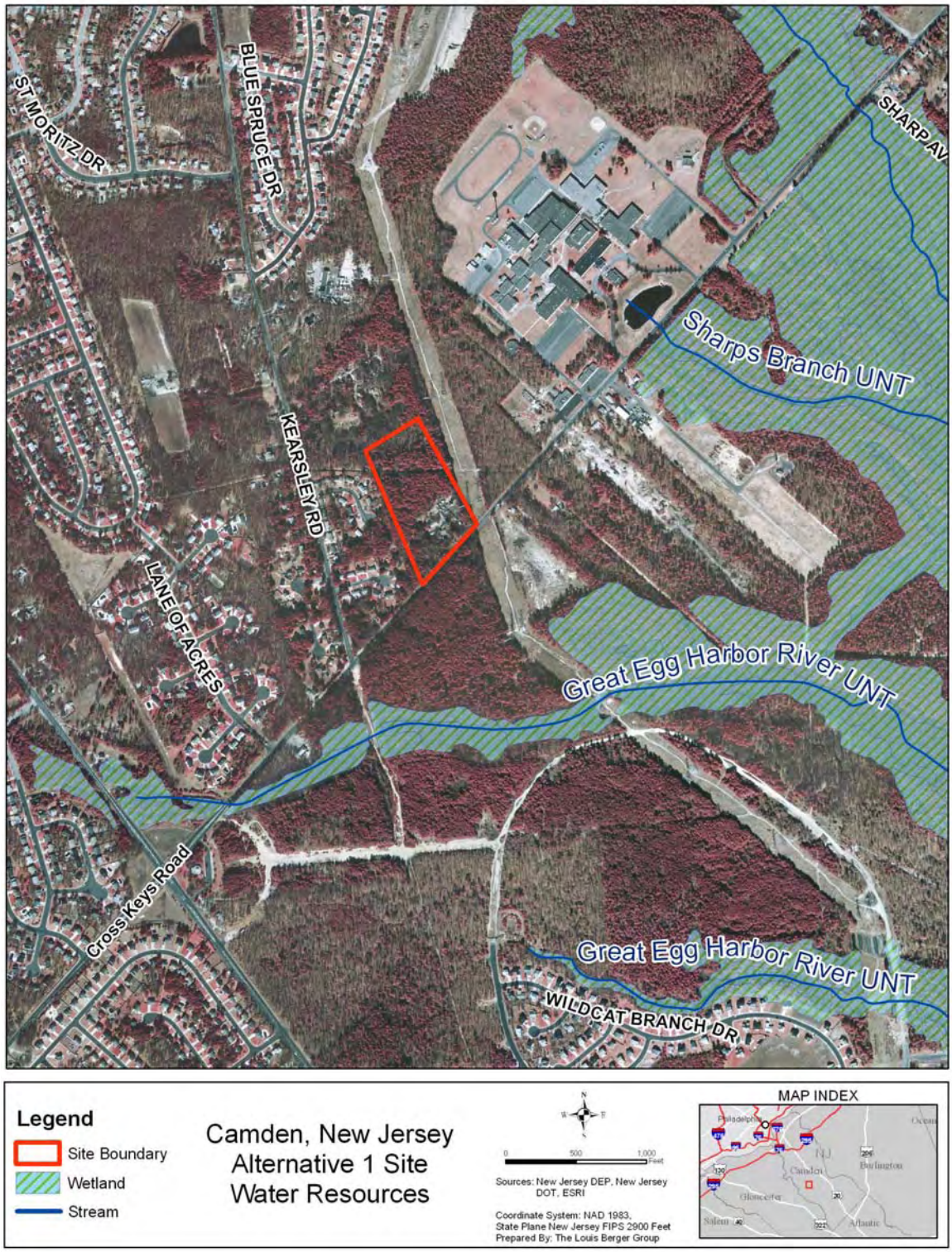
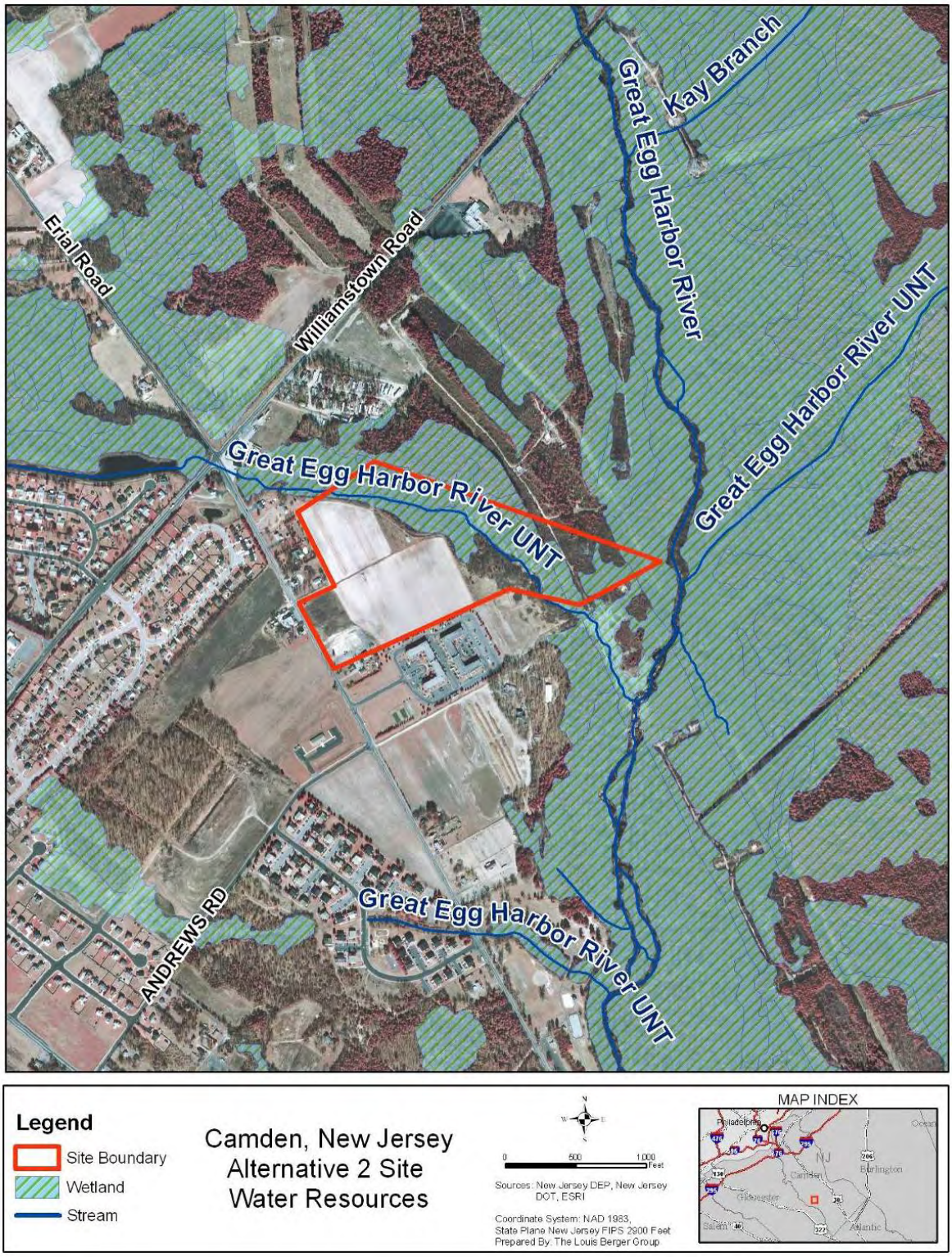


Figure 4-10. Water Resources in the Vicinity of the Alternative 2 Site



ground or surface water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted to life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and “similar areas” as defined in 33 CFR Part 328. New Jersey protects wetlands under the New Jersey Freshwater Wetlands Protection Act, N.J.S.A. 13:9B. This law also protects transition areas or "buffers" around freshwater wetlands. The width of the buffer area varies according to the “resource classification” of the wetlands: “Ordinary Class” wetlands do not require a buffer, “Intermediate Class” wetlands require a 50-foot buffer, and “Exceptional Class” wetlands require a 150-foot buffer. The NJDEP GIS data does not classify the type of wetlands found on the Erial Road property.

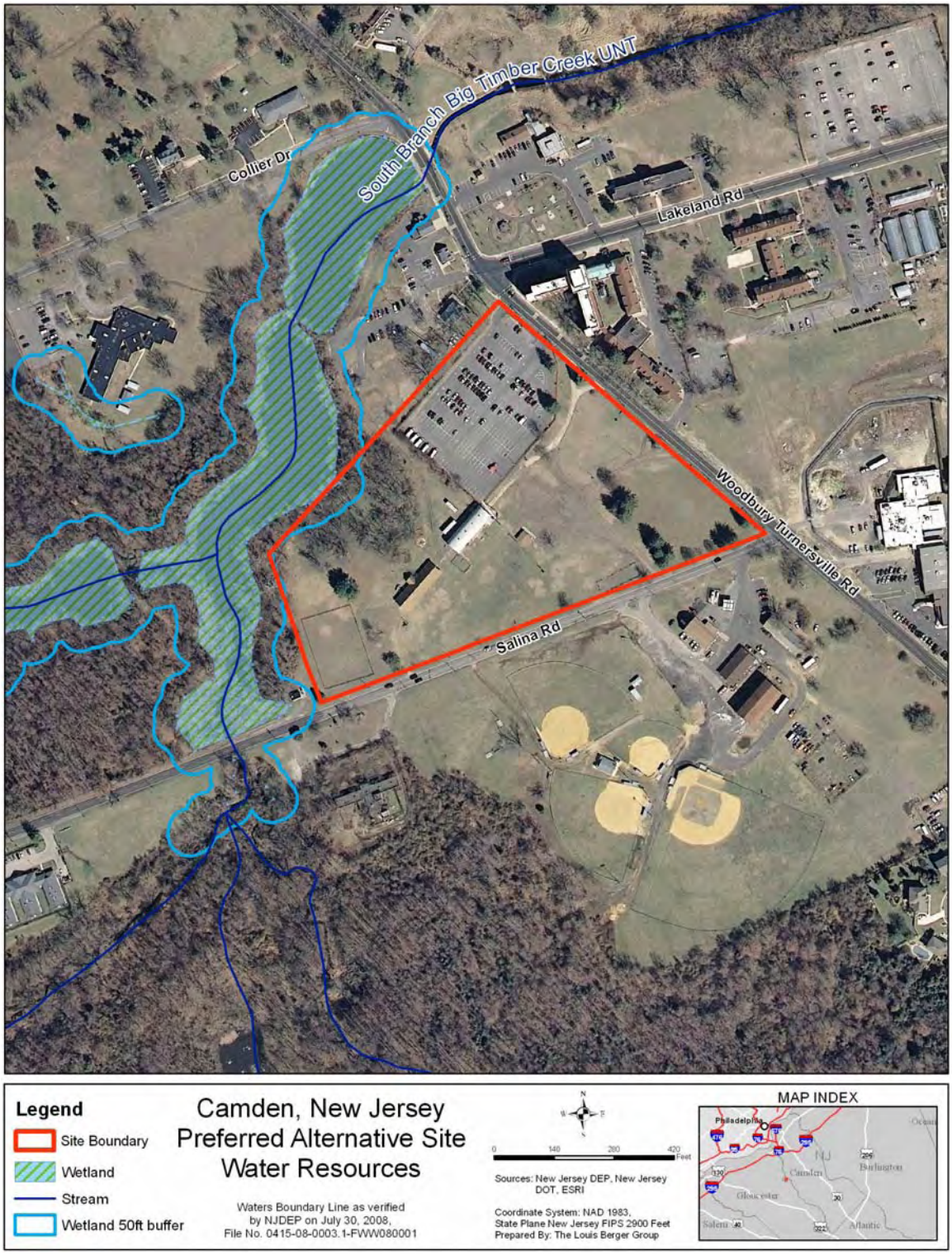
Preferred Alternative – Lakeland

No natural surface water bodies (ponds or streams) exist on the Preferred Alternative site. The proposed site is adjacent to an unnamed tributary of the South Branch of Big Timber Creek located to the west and northwest of the site (see Figure 4-11). The proposed site is nearly level and slopes gently to the northwest. Per the NJDEPs “Wetlands of Camden County” GIS data, there are no mapped wetlands located on the property (NJDEP, 1986). However, a wetland delineation was conducted on the site in 2008 by Camden County. The nearest wetlands to the Preferred Alternative site are associated with the unnamed tributary to the South Branch of Big Timber Creek immediately west and northwest of the site boundary (Bach Associates, 2008). On July 30, 2008, a Letter of Interpretation (LOI) related to wetlands and wetland transition areas was issued under NJDEP file number 0415-08-0003.1-FWWW080001 confirming the delineation and indicating that they are intermediate resource value wetlands, meaning they have a 50-foot protective buffer associated with them (NJDEP, 2008d). The Preferred Alternative site encompasses approximately 1/4 acre of the 50-foot protective wetland buffer in the northwestern portion of the site (see Figure 4-11).

4.7.1.2 Hydrogeology/Groundwater

The Coastal Plain consists of five principal aquifers: the Kirkwood-Cohansey aquifer system, the Atlantic City 800-foot sand, the Wenonah-Mount Laurel aquifer, the Englishtown aquifer, and the Potomac-Raritan-Magothy aquifer system. All but the Kirkwood-Cohansey are confined except where they crop out or are overlain by permeable surficial deposits. The aquifers are recharged directly by precipitation in outcrop areas, by vertical leakage through confining beds, and by seepage from surface water bodies. All three alternative sites are located above the Kirkwood-Cohansey aquifer system.

Figure 4-11. Water Resources in the Vicinity of the Preferred Alternative Site



More than 75 percent of the freshwater supply in the New Jersey Coastal Plain is from groundwater. In the Coastal Plain, high-capacity production wells used for public supply commonly yield 500 to 1,000 gallons per minute (gpm), and many exceed 1,000 gpm. Water quality is satisfactory except for local excessive iron concentrations (as much as 460 milligrams per liter [mg/L]) in several aquifers, including the Potomac-Raritan-Magothy, and for local contamination from saltwater intrusion and waste disposal. In the unconfined Kirkwood-Cohansey aquifer system, water is brackish or salty in some coastal areas. In confined aquifers, salinity generally increases with depth in the southern and southeastern parts of the Coastal Plain (USGS, 2008).

Alternative 1 – Cross Keys Road

Under natural, undisturbed conditions, shallow groundwater flow generally follows the topography of the land surface, and on this basis, the topography suggests that groundwater flow across the site is in a southeasterly direction toward an unnamed tributary of Great Egg Harbor River, which is approximately 1000 feet to the south. However, localized conditions can alter flow direction and thus the presumed flow may not coincide with the actual flow in the subject area. Based on review of a Soil and Foundation Engineering Report (Underwood Engineering Company, 2007), groundwater in the vicinity of the site is anticipated to be encountered at a depth of approximately 5 to 9 feet below ground surface.

Alternative 2 – Erial Road

As previously indicated, shallow groundwater flow generally follows the topography of the land surface, and on this basis, the topography suggests that groundwater flow across the site is in a northeasterly direction toward the unnamed tributary of Great Egg Harbor River that crosses the northeast portion of the property. However, localized conditions can alter flow direction and thus the presumed flow may not coincide with the actual flow in the subject area.

Preferred Alternative - Lakeland

The Preferred Alternative site drains approximately in a northwest direction toward the unnamed tributary of the South Branch of Big Timber Creek which drains into Big Timber Creek and eventually into the Delaware River (Camden County, 2010). However, as discussed above, localized conditions can alter flow direction and thus the presumed flow may not coincide with the actual flow in the subject area.

4.7.1.3 Floodplains

The Federal Emergency Management Agency (FEMA) prepares Flood Insurance Rate Maps (FIRM) to establish actuarial rates for structures, based upon the risk of flooding. In addition, the New Jersey Department of Environmental Protection has adopted new Flood Hazard Area Control Act Rules (N.J.A.C. 7:13) in order to incorporate more stringent standards for development in flood hazard areas and riparian zones adjacent to surface waters throughout the state. To minimize the impacts of development on flooding, a 0 percent net-fill requirement now applies to all non-tidal flood hazard areas of New Jersey. The new rules also expand the preservation of near-stream vegetation by implementing riparian zones that are 50, 150 or 300 feet in width along each side of surface waters. The riparian zone width depends on the environmental resources being protected, with the most protective 300-foot riparian zone applicable to waters designated as Category 1 and certain upstream tributaries. A 150-foot riparian buffer is associated with certain waters supporting trout, or habitats of threatened or endangered species critically dependant on the watercourse to survive, or watercourses which flow through areas that contain acid-producing soil deposits. A 50-foot riparian buffer is associated with waters that do not meet the 300-foot or 150-foot buffer requirement. (NJDEP, 2008e)

Alternative 1 – Cross Keys Road

Per FIRM #34007CO138E, there is no designated floodplain located on the property (FEMA, 2008). The Alternative 1 site does not contain natural surface water bodies; therefore, there are no associated riparian buffers.

Alternative 2 – Erial Road

Per FIRM # 34007C0202E, there is regulated floodplain along the northeast portion of the property, associated with the unnamed tributary of Great Egg Harbor River. This floodplain is designated as flood zone A, which is an area “with a 1% annual flood risk and a 26% risk of flooding over the life of a 30-year mortgage” (FEMA, 2008). This unnamed tributary is not designated as a Category 1 water (NJDEP, 2006), nor does the site does contain geological surface formations that indicate the presence of acid-producing soils (NJDEP, 2009d); therefore, a 50-riparian buffer would be associated with this waterbody (NJDEP, 2008e) .

Preferred Alternative - Lakeland

Per FIRM #3401330010A, there is no designated floodplain located on the property (FEMA, 2008). The unnamed tributary to the South Branch of Big Timber Creek associated with the Preferred Alternative site does not meet the classification for Category 1 waters (NJDEP, 2006).

4.7.1.4 Coastal Zone

According to the NJDEP, none of the alternative sites are located within the New Jersey coastal zone (NJDEP, 2007c).

4.7.2 Environmental Consequences

To assess the magnitude of impacts to water resources in the area of the project sites, the following impact thresholds were used:

> ***No Effect*** – Current water quality and hydrologic conditions would not be altered or conditions do not exist for impacts to occur.
>
> ***No Significant Effect*** – Impacts (chemical, physical, or biological effects) would be either not detectable, or detectable, but at or below water quality standards or criteria. Alterations in water quality and hydrologic conditions relative to historical baseline may occur, however, only on a localized and short-term basis.
>
> ***Significant Effect*** – Impacts (chemical, physical, or biological effects) would be detectable and would be frequently altered from the historical baseline or desired water quality conditions; and/or chemical, physical, or biological water quality standards or criteria would be locally, slightly and singularly, exceeded on either a short-term or prolonged basis.

4.7.2.1 No Action Alternative

Under the No Action Alternative, there would be no effect on area water resources.

4.7.2.2 Alternative 1 – Cross Keys Road

Surface Water/Wetlands

Under the Alternative 1, no significant effects on surface waters would be expected, and no effects on wetlands would be expected. There are no wetlands on or immediately adjacent to the site. During site preparation, earthworks, and construction activities at the site, best management practices (BMPs) for

erosion and sediment controls would ensure that stormwater runoff would not cause or exacerbate erosion and potentially impact area waters. These BMPs would also control any runoff that could otherwise potentially impact the wetlands to the south of Cross Keys Road. Potential BMPs may include installation of silt fences, coverage of soil piles with mulch, installation of hay bales, and maintaining exposed surface soils in a damp state.

The proposed project would create approximately 3.7 acres of impervious surface, increasing the amount of stormwater runoff produced on-site. Specific stormwater management measures for the Proposed Action have not yet been designed. However, all stormwater generated on-site from the proposed facilities would be treated for both quality and quantity on-site and any stormwater discharged off-site would meet all state and local regulatory and permit requirements. Potential solutions for treating stormwater quality and quantity include installing oil-water separators (OWS) and constructing detention pond(s) on-site to collect runoff from impervious surfaces with over flow discharging to drainage ditches. Final calculations for the amount of stormwater expected to be generated by the new facilities and how that stormwater would be adequately managed for both quality and quantity to meet all state and local regulatory and permit requirements will be finalized during the facility design process. In January, 2010, the DoD implemented new stormwater requirements for projects with footprints exceeding 5000 SF. The new regulations are under Section 438 of the Energy Independence Security Act (EISA) (DoD, 2010) and state that Federal facility projects over 5,000 SF must "maintain and restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow" (DoD, 2010). Construction of this project would comply with EISA 438 regulations.

The OMS conducts routine vehicle maintenance operations (e.g. oil changes etc.) so the potential for fuel and lubricant spills at the proposed facilities suggests that there may be minor effects associated with the operation of the new AFRC. However, the proposed OMS design would likely include floor drains that convey flow through oil-water separators prior to discharging to either the sanitary sewer system or stormwater management facilities, thus minimizing the likelihood of pollutants entering the stormwater.

Hydrogeology/Groundwater

No significant impacts to groundwater resources would be expected. Any construction, demolition, and operation of facilities on the site would continue to adhere to existing applicable groundwater protection protocols as required under the Safe Drinking Water Act. Leaks from vehicles and vehicle maintenance operations could pose a threat to groundwater resources. However, the potential for spills and leaks would

be minimized by existing on-site clean-up procedures and equipment, the likely installation of OWS, and adherence to safety procedures for vehicle maintenance and the operation of equipment. In addition, vehicle operations and maintenance performed at the OMS only involves small amounts of fuels, oils, and lubricants, thus substantially reducing the potential for larger spills or leaks. These measures would ensure that any potential effects would likely be negligible and have no significant impacts. In addition, the site is currently served by public water and would not require withdrawals from the underlying Kirkwood-Cohansey Aquifer System.

Floodplains

The Cross Keys Road site is located outside of the 100-year floodplain; therefore no effects would be expected. No impacts to riparian buffers would be expected as the site does not contain water bodies or associated buffers.

Coastal Zone

The Cross Keys Road site is not located in the NJ Coastal Zone; therefore there would be no effects.

4.7.2.3 Alternative 2 – Erial Road

Surface Water/Wetlands

Under this alternative, no significant effects on surface waters or wetlands would be expected. The Army would purchase a total of approximately 10 acres of the overall 34 acre parcel. The exact 10 acres to be purchased has not yet been determined; however, the Army would not include any wetlands or any portion of the unnamed tributary to the Great Egg Harbor River in its purchase. Thus, the AFRC would be constructed on the previously disturbed portion of the site currently being used as farmland, which would not result in any physical disturbance to wetlands or the tributary located on the rear of the parcel. Should the Army select this site for construction of the AFRC, a LOI Application would be submitted to NJDEP in accordance with the New Jersey Freshwater Wetlands Protection Act Rules (N.J.A.C. 7:7A) – to include delineation maps, soil data, and plant & wildlife reports - that would help to officially determine the classification, boundaries, and buffer/transition area of the forested wetlands in the vicinity of the approximately 10 acres to be purchased. Acquisition of wetland buffer/transition areas is not an action that would require a NJDEP permit. All proposed construction activities would try to avoid to the maximum extent possible any wetland buffer/transition area. However, should the proposed project disturb any designated wetland buffer/transition area, the Army would be required to undergo the New Jersey Freshwater Wetland Permit process to obtain a Wetland Transition Area Permit.

During site preparation, earthworks, and construction activities at the site, BMPs for erosion and sediment controls would ensure that stormwater runoff would not cause or exacerbate erosion and potentially impact the stream or wetlands. Potential BMPs may include installation of silt fences, coverage of soil piles with mulch, installation of hay bales, and maintaining exposed surface soils in a damp state.

Similar to the Alternative 1, all stormwater generated from the newly constructed impervious surfaces would be treated on-site for quality and quantity and would meet all state and local regulatory requirements governing stormwater. Potential solutions for treating stormwater quality and quantity on-site include installing OWS and constructing detention pond(s) to collect runoff from impervious surfaces with over flow discharging to drainage ditches or the adjacent wetlands. Final calculations for the amount of stormwater expected to be generated by the new facilities and how that stormwater would be adequately managed for both quality and quantity to meet all state and local regulatory and permit requirements will be finalized during the facility design process. Construction of the Proposed Action at the Alternative 2 site would also comply with EISA 438 regulations.

The OMS conducts routine vehicle maintenance operations (e.g. oil changes etc.) so the potential for fuel and lubricant spills at the proposed facilities suggests that there may be minor effects associated with the operation of the new AFRC. However, the proposed OMS design would likely include floor drains that convey flow through oil-water separators prior to discharging to either the sanitary sewer system or stormwater management facilities, thus minimizing the likelihood of pollutants entering the stormwater.

Currently, there is not sufficient sewer capacity at the Alternative 2 site to accommodate the proposed AFRC facilities, and there is sewer moratorium in this area of Winslow Township as well, for which the Township has made an application to lift (Gallagher, 2010). If this site is selected for implementing the Proposed Action, the facilities would tie into the Township's sanitary sewer system if the moratorium is lifted by the time the facilities are constructed. If the sanitary sewer moratorium is not lifted by the time construction occurs, the AFRC facility sewer lines would still be constructed for tie in, but would not be connected to the township sanitary sewer infrastructure. The Army would continue to coordinate with the township and tie into the system when the moratorium has been lifted. In the interim, an onsite sanitary sewer treatment facility would be constructed to accommodate and treat the wastewater produced by the operation of the facilities. The sanitary sewer system would be constructed in compliance with all applicable state and local regulations, ensuring discharges from the facility met all water quality standards and resulted in no significant impacts to area surface waters.

Hydrogeology/Groundwater

Impacts to hydrology and groundwater would be similar to those under the Alternative 1 and would not be significant. In addition, as described above under Surface Waters/Wetlands, if wastewater needs to be collected and treated onsite prior to the lifting the sewer moratorium and connection to the Township's sanitary sewer infrastructure, the onsite sanitary sewer treatment facility would meet all applicable state and local regulations, ensuring there would be no significant impacts to the groundwater of the site or surrounding area.

Floodplains

There would be no effect on floodplains under this alternative, because all proposed development would be located outside of the mapped floodplain that exists on the property. Due to the size of the overall property, if the Alternative 2 site is selected for implementing the Proposed Action the Army would be able to design the facilities to avoid disturbing the 50-foot riparian buffer area associated with the unnamed tributary to the Great Egg Harbor River, resulting in no significant impact.

Coastal Zone

The Erial Road site is not located in the NJ Coastal Zone; therefore there would be no effects.

4.7.2.4 Preferred Alternative – Lakeland

Surface Water/Wetlands

Under the Preferred Alternative, no significant effects on surface waters and wetlands would be expected. There are no wetlands on the site; however, wetlands associated with the unnamed tributary to the South Branch of Big Timber Creek are located adjacent to the western and northwestern boundary of the site. There is also a 1/4-acre portion of the 50-foot wetland buffer located in the northwestern corner of the site. All proposed construction activities would avoid to the maximum extent possible any wetland buffer/transition area. However, should the proposed project disturb any designated wetland buffer/transition area, the Army would be required to undergo the New Jersey Freshwater Wetland Permit process to obtain a Wetland Transition Area Permit. The proposed project would likely not qualify for an individual permit to disturb the 50-foot transition area associated with the wetlands (NJDEP, 2010b). Individual permits are required when no other alternative sites are available. There are several different categories of permits that would likely apply to this project, such as an "averaging transition area waiver", which modifies the overall shape of the transition area without reducing the total square footage, and a

"matrix type width reduction transition area waiver" which reduces the width of the actual transition area (NJDEP, 2010b).

During site preparation, earthworks, and construction activities at the site, BMPs for erosion and sediment controls would ensure that stormwater runoff would not cause or exacerbate erosion and potentially impact the stream or wetlands. Potential BMPs may include installation of silt fences, coverage of soil piles with mulch, installation of hay bales, and maintaining exposed surface soils in a damp state.

Similar to the Alternative 1, all stormwater generated from the newly constructed impervious surfaces would be treated on-site for quality and quantity and would meet all state and local regulatory requirements governing stormwater. Potential solutions for treating stormwater quality and quantity on-site include installing OWS and constructing detention pond(s) to collect runoff from impervious surfaces with over flow discharging to drainage ditches or the adjacent wetlands. Final calculations for the amount of stormwater expected to be generated by the new facilities and how that stormwater would be adequately managed for both quality and quantity to meet all state and local regulatory and permit requirements would be finalized during the facility design process. Construction of the Proposed Action at the Preferred Alternative site would also comply with EISA 438 regulations.

The OMS conducts routine vehicle maintenance operations (e.g. oil changes etc.) so the potential for fuel and lubricant spills at the proposed facilities suggests that there could potentially be minor effects associated with the operation of the new AFRC. However, the proposed OMS design would likely include floor drains that convey flow through oil-water separators prior to discharging to either the sanitary sewer system or stormwater management facilities, thus minimizing the likelihood of pollutants entering the stormwater.

As discussed under the Geology and Soils section above, it is presumed by the NJDEP that the Preferred Alternative site contains acid producing soil deposits. Therefore, a 150-foot riparian zone buffer is associated with the unnamed tributary of the South Branch of Big Timber Creek. This buffer encroaches upon the project site and could impact the construction of facilities on the site. Therefore, the Army is conducting soil testing in accordance with the methods stipulated by the NJDEP (NJDEP, 2008e) to verify if acid producing soils are actually present. The results of the testing are currently not available. If testing indicates that acid producing soils are not present, construction activities would not result in potential water pollution issues from exposing the soils to air. If soil testing confirms the presumption that acid producing soils are present, the 150-foot riparian buffer would remain intact. Disturbing the acid producing soils through construction activities would expose them to air causing them to go through the

sulfuricization process, potentially resulting in significant impacts to water quality through runoff into the unnamed tributary of the South Branch of Big Timber Creek. However, to mitigate impacts caused by exposing acid producing soils to the atmosphere the Army would commit to employing the mitigation measures as described in the draft Technical Manual for Flood Hazard Area Control Act Rules (Section 7.5 General Mitigation Standards, Section 7.6 Mitigation Procedures Along Channels, and Section 7.7 Disposal of Acid Producing Soil Deposits) (NJDEP, 2008e), reducing potential impacts to water quality to levels that are not significant. The Army would also go through the necessary permitting process to obtain a permit from the NJDEP under the Flood Hazard Area Control Act to conduct allowable, regulated activities in the 150-foot riparian zone. To obtain a permit the Army may have to reengineer the design of the facilities on the site to adjust what is constructed in the buffer. Meeting NJDEP permit requirements and implementing the required soil mitigation measures stipulated by the NJDEP would result in no significant impacts to the adjacent surface water body. If acid producing soils are present and the Army is not able to reengineer the design of the facilities in a manner sufficient enough to meet NJDEP permitting requirements, the Army would not be able to construct the facilities on this site. This action would result in no impacts to surface waters on the Preferred Alternative site.

Hydrogeology/Groundwater

Impacts to hydrology and groundwater would be similar to those under Alternative 1 and would not be significant.

Floodplains

The Preferred Alternative site is located outside of the 100-year floodplain; therefore no effect would be expected.

As discussed under the Geology and Soils section above, it is presumed by the NJDEP that the Preferred Alternative site contains acid producing soil deposits. Therefore, a 150-foot riparian zone buffer is associated with the unnamed tributary of the South Branch of Big Timber Creek. This buffer encroaches upon the project site and could impede the construction of facilities on the site. Therefore, the Army is conducting soil testing in accordance with the methods stipulated by the NJDEP (NJDEP, 2008e) to verify if acid producing soils are actually present. The results of the testing are currently not available. If testing indicates that acid producing soils are not present the 150-foot riparian buffer would revert to a 50-foot riparian buffer (NJDEP, 2007d and 2008e) and the Army would be able to avoid impacting this buffer during the construction of the new facilities. If testing indicates that acid producing soils are present, the 150-foot riparian buffer would remain intact and the Army would go through the necessary

permitting process to obtain a permit from the NJDEP under the Flood Hazard Area Control Act to conduct allowable, regulated activities in the 150-foot riparian zone. To obtain a permit might require the Army to redesign the layout of the facilities on the site to either adjust what is constructed in the buffer or to avoid the 150-foot buffer all together. In either case, meeting the NJDEP permit requirements would result in no significant impacts to the riparian zone. If acid producing soils are present and the Army is not able to adjust the design layout of the facilities in a manner sufficient enough to obtain a permit from the NJDEP, the Army would not select this site for implementing the Proposed Action. This would result in no impacts to the riparian zone.

Coastal Zone

The Preferred Alternative site is not located in the NJ Coastal Zone; therefore there would be no effect.

4.8 BIOLOGICAL RESOURCES

4.8.1 Affected Environment

4.8.1.1 Vegetation

New Jersey has five physiographic regions that are based on the underlying geology – Ridge and Valley, Highlands, Piedmont, Inner Coastal Plain, and the Outer Coastal. All three alternative sites are located in the Inner Coastal Plain. Table 4-6 includes the native plant species commonly found in this region.

Table 4-6. Representative Vegetation Commonly Found in the Inner Coastal Plain of New Jersey

Common Name	Scientific Name
TREES - OVERSTORY	
White ash	*Fraxinus americana*
Green ash	*Fraxinus pennsylvanica*
Tuliptree	*Liriodendron tulipifera*
White pine	*Pinus strobus*
Sycamore	*Platanus occidentalis*
Southern red oak	*Quercus falcata*
Pin oak	*Quercus palustris*
Red oak	*Quercus rubra*
Black oak	*Quercus velutina*
TREES - UNDERSTORY	
Smooth alder	*Alnus serrulata*

Common Name	Scientific Name
Shadbush	*Amelanchier canadensis*
Gray birch	*Betula populifolia*
Ironwood	*Carpinus caroliniana*
Redbud	*Cercis canadensis*
Flowering dogwood	*Cornus florida*
Persimmon	*Diospyros virginiana*
Red cedar	*Juniperus virginiana*
SHRUB	
Black chokeberry	*Aronia melanocarpa*
Buttonbush	*Cephalanthus occidentalis*
Sweet pepperbush	*Clethra alnifolia*
Gray dogwood	*Cornus racemosa*
Winterberry	*Ilex verticillata*
Northern bayberry	*Myrica pennsylvanica*
Elderberry	*Sambucus canadensis*

Source: Rutgers, 2007

The Alternative 1 site at Cross Keys Road consists of approximately 11 acres of vacant agricultural land that was used in the past for crops and chicken and livestock (USACE, 2008). Approximately 9 acres of the site once contained a mixed coniferous/deciduous forest common to the region. The site was cleared and graded in 2007 and now only contains a few remaining mature trees along the northern boundary and near the residence in the southeast portion of the property. Vegetation in the remaining portion of the property consists of grasses approximately 0 to 3 feet in height (CH2MHill, 2009).

The Alternative 2 site at Erial Road consists of 34 acres that is currently a working farmland. Approximately 1/2 to 1/3 of the acreage in the northeast portion of the parcel is forested with mature mixed coniferous/deciduous species common to the region. The wetland area associated with the unnamed tributary to the Great Egg Harbor River also contains the undeveloped, forested sites.

The Preferred Alternative site at Lakeland consists of 12 acres that is currently the 4-H County Fairgrounds and a parking lot for Camden County Health Department employees. The property is mostly vegetated with turfgrass with some scattered trees, including red maple, northern red oak, and spruce along Woodbury-Turnersville Road and Salina Road (Camden County, 2010). An approximate 1 acre mixed coniferous/deciduous wooded area is located on the northwestern portion of the property.

4.8.1.2 Wildlife

The state of New Jersey "lies at the southern edge of the range for many 'northern' species and at the northern edge of the range of many 'southern' species" (Audubon, 2008). New Jersey's geographic position, with its hundreds of miles of coastline, five distinct physiographic regions, and the Pine Barrens area combine to provide a variety of habitats for wildlife resources (Audubon, 2008).

At present, none of the three alternative sites have had a comprehensive inventory of fish and wildlife resources. However, wildlife species occurring at the sites could be typical of those that have been recorded in the state (NJ Bird Records, 2006; Audubon, 2008). Wildlife found at the Alternative 1 site would consist of species that utilize open fields and are tolerant to human disturbances. Wildlife found at the Alternative 2 site would consist of species that inhabit brush/shrub habitat, utilize small stands of trees and open fields, and are tolerant to human disturbance. Species that are likely to utilize the Preferred Alternative site include various avian species such as blue jay, American robin, cardinal, house sparrow, and American crow, as well as gray squirrel, eastern chipmunk, eastern box turtle, and Whitetail deer (Camden County, 2010). Other wildlife species that could be expected to occur within the alternative sites are listed in Table 4-7.

Table 4-7. Representative Wildlife Commonly Found in the Mid-Atlantic Region

Common Name	Scientific Name	Common Name	Scientific Name
American crow	*Corvus brachyrhynchos*	Gray squirrel	*Sciurus carolinensis*
American robin	*Turdus migratorius*	Mourning dove	*Zenaida macroura*
American toad	*Bufo americanus*	Northern cardinal	*Cardinalis cardinalis*
Black-capped chickadee	*Parus atricapullis*	Red fox	*Vulpes fulva*
Blue jay	*Cyanocitta cristata*	Red-winged blackbird	*Agelaius phoeniceus*
Bull frog	*Rana catesbeiana*	Ring-necked pheasant	*Phasianus colchicus*
Eastern bluebird	*Sialia sialis*	Ruffed grouse	*Bonasa umbellus*
Eastern box turtle	*Terrapene carolina*	Striped skunk	*Mephitis mephitis*
European starling	*Sturnus vulgaris*	White-tailed deer	*Odocoileus virginianus*
Gray fox	*Urocyon cinereoargenteus*	Wild turkey	*Meleagris gallopavo*

Source: NJ Bird Records, 2006; Audubon, 2008

4.8.1.3 Threatened, Endangered, and Sensitive Species

The U.S. Fish and Wildlife Service (USFWS) has responsibility for the listing of threatened and endangered species, and they make determinations as to whether formal Section 7 consultations under the ESA are necessary in regards to the Proposed Action.

The Alternative 1 and Alternative 2 sites are not known to support any federally-listed rare, threatened, or endangered species of plants or animals. As part of this EA process an initial coordination letter was sent to the USFWS on April 10, 2009 with a second follow-up correspondence on May 19, 2009 seeking confirmation that no federally-listed species occur on either the Alternative 1 or Alternative 2 sites (see Appendix B). By letter dated July 21, 2009 the USFWS indicted that no federally listed or proposed threatened or endangered flora or fauna under the jurisdiction of the USFWS exists on either of the proposed alternative sites. The USFWS recommended that all upland clearing be minimized to the maximum extent practicable, that a tree clearing restriction be established from April 1 through August 15 to protect potential nesting migratory birds, and that all landscaping proposed for the project utilize native species of New Jersey.

The Preferred Alternative site was evaluated for federally-listed rare, threatened, or endangered species of plants or animals. It was determined that no endangered species habitats or occurrence of individuals are located on the property (Camden County, 2010). A letter to the USFWS was sent on March 9, 2010 seeking confirmation that no federally-listed species occur on the Preferred Alternative site. Appendix B will include responding correspondence from the USFWS regarding the Preferred Alternative site when it has been received.

Coordination letters were also sent to the NJDEP Natural Heritage Program seeking information about the presence of any state-listed species on the alternative sites – letters were dated April 10, 2009 for Alternatives 1 and 2 and March 9, 2010 for the Preferred Alternative (see Appendix B). By letters dated April 23, 2009, the NJDEP Natural Heritage Program indicated the occurrence of several state rare wildlife species or wildlife habitat on the Alternative 1 and Alternative 2 sites (see Appendix B). The species indicated by the NJDEP Natural Heritage Program are listed in Tables 4-8 and 4-9. The NJDEP response letter for the Preferred Alternative site, dated March 17, 2010, indicated that there are no records of any rare wildlife species on the site.

Table 4-8. State Rare wildlife species with occurrence on the Alternative 1 Site

Common Name	Scientific Name	State Status*
Cooper's hawk	*Accipiter cooperii*	T/S
Eastern box turtle	*Terrapene carolina carolina*	SC
Eastern king snake	*Lampropeltis g. getula*	U
Great blue heron	*Ardea Herodias*	SC/S

*Note: Status for animals separated by a slash(/) indicate a duel status. First status refers to the state breeding population, and the second status refers to the migratory or winter population.
T – threatened species; S – Stable species; SC – special concern; U – Undetermined species (not enough information available to determine the status)
Source: NJDEP, 2009a

Table 4-9. State Rare wildlife species with occurrence on the Alternative 2 Site

Common Name	Scientific Name	State Status*
Eastern box turtle	*Terrapene carolina carolina*	SC
Great blue heron	*Ardea Herodias*	SC/S

*Note: Status for animals separated by a slash(/) indicate a duel status. First status refers to the state breeding population, and the second status refers to the migratory or winter population.
S – Stable species; SC – special concern.
Source: NJDEP, 2009b

The Natural Heritage Database did not indicate any additional state rare wildlife species or wildlife habit within 1/4 mile of the Alternative 1 site, nor did it indicate the presence of any state rare plant species or ecological communities on or within 1/4 mile of the three Alternative sites (NJDEP, 2009a; 2009b; 2010a). Several state rare wildlife species or wildlife habitat occur within 1/4 mile of the Alternative 2 Site, including the Eastern king snake, Fowler's toad (*Bufo woodhousii fowleri*), and wood thrush (*Hylocichla mustelina*) (NJDEP, 2009b). The great blue heron is also known to occur within 1/4 mile of the Preferred Alternative site (NJDEP, 2010a). No State Natural Heritage Priority Sites, which are critically important areas to conserve New Jersey's biological diversity, with particular emphasis on rare plant species and ecological communities, are located within the vicinity of the three alternative sites (NJDEP, 2007b).

Cooper's hawk – breeding population: State threatened

In southern New Jersey, breeding habitats for the Cooper's hawk include large, remote red maple or black gum swamps and on occasion, Atlantic white cedar swamps. Nesting sites are often located within sub-climax forests that provide a closed canopy, moderate to heavy shrub cover, and trees more than 30 years old. As the Cooper's hawk population has increased in the State of New Jersey since it was first listed as endangered by the state in 1974, it has also nested in smaller woodlots containing mature trees and

fragmented woods within agricultural, suburban or urban landscapes; though they may exhibit limited tolerance for human disturbance and habitat fragmentation (NJDEP, 2008c).

Eastern box turtle: State species of concern

Eastern box turtles prefer moist forested areas with sufficient underbrush and overgrown old fields that provide ample cover and sunlight (Luensmann, 2006 and CTDEP, 2009). Although it is a terrestrial turtle and abundant water resources are not necessary for the species' life cycle, the eastern box turtle also prefers habitat containing open water for cooling and to avoid dehydration, especially amongst juveniles (Luensmann, 2006 and CTDEP, 2009). The eastern box turtle nests in sandy and loamy soils that may occur in early successional fields, meadows, utility right of ways, woodland openings, roadsides, cultivated gardens, residential lawns, mulch piles, beach dunes, and abandoned gravel pits (Niedzielski, 2002 and MADFW, 2007).

Eastern king snake: State status undetermined

Eastern king snakes inhabit a variety of areas including hardwood and pine forests, bottomlands and swamps, hammocks, tidal wetlands, and even farmlands and suburban areas. This species is mainly terrestrial, but inhabits areas close to water such as stream banks and swamp borders (Andrews and Willson, n.d.). Like most snakes they are quite secretive and are frequently found under logs or boards.

Great blue heron: State – breeding population: State species of concern

Great blue herons occur in a variety of habitats from freshwater lakes and rivers to brackish marshes, lagoons, mangrove areas, and coastal wetlands. They also usually nest near water and are often found in riparian swamps (Short and Cooper, 1985).

4.8.2 Environmental Consequences

The following thresholds were used to determine the magnitude of effects on wildlife and wildlife habitat and vegetation, with separate criteria being used to evaluate impacts to federally threatened and endangered species:

> ***No Effect*** – No impacts to native species, their habitats, or the natural processes sustaining them would occur, or such conditions do not exist for impacts to occur.
>
> ***No Significant Effect –*** Impacts would be detectable, but would not be expected to be outside the natural range of variability and would not have any long-term effects on native species, their

habitats, or the natural processes sustaining them. Occasional responses to disturbance by some individuals could be expected, but without interference to feeding, reproduction, or other factors affecting population levels. Sufficient habitat would remain functional to maintain viability of all species.

Significant Effect – Impacts on native species, their habitats, or the natural processes sustaining them would be detectable, and they would be expected to be outside the natural range of variability for long periods of time or be permanent. Population numbers, population structure, genetic variability, and other demographic factors for species might have large, short-term declines, with long-term population numbers significantly depressed. Frequent responses to disturbance by some individuals would be expected, with negative impacts to feeding, reproduction, or other factors resulting in a long-term decrease in population levels. Loss of habitat might affect the viability of at least some native species.

Impacts to federally threatened and endangered species were classified using the following terminology, as defined under the ESA:

No effect – The proposed action would not affect a listed species or designated critical habitat OR listed species or designated critical habitat are not present.

May affect / not likely to adversely affect – Effects on special status species are discountable (i.e., extremely unlikely to occur and not able to be meaningfully measured, detected, or evaluated) or completely beneficial.

May affect / likely to adversely affect – When an adverse effect to a listed species may occur as a direct or indirect result of proposed actions and the effect is either not discountable or completely beneficial.

Likely to jeopardize proposed species/adversely modify proposed critical habitat – The appropriate conclusion when the Army identifies situations in which actions could jeopardize the continued existence of a proposed species or adversely modify critical habitat to a species within and/or outside of the proposed project site boundaries.

4.8.2.1 No Action Alternative

Under the No Action Alternative, the proposed new facilities would not be constructed on any of the alternative sites; therefore, no impacts to biological resources would occur.

4.8.2.2 Alternative 1 – Cross Keys Road

Vegetation – No significant adverse effects would be expected as a result of implementing the Proposed Action at the Alternative 1 site. Vegetation on site has, for the most part, already been cleared by the current owner. With the exception of the few remaining mature trees around the western and northern perimeter of the parcel and around the farmhouse, the majority of the site consists of grassy field. The footprint of the AFRC at the Alternative 1 site would require the removal of the few remaining trees around the farmhouse when the house is demolished. Efforts would be made to preserve a few of the particularly large trees, if site preparation and construction can occur without causing potential damage to root systems.

Wildlife – No significant adverse effects would be expected as a result of implementing the Proposed Action at the Alternative 1 site. Some species, particularly birds, would be temporarily discouraged from the area through disturbance of habitat, noise, and/or dust. Wildlife in the immediate area would scatter to adjacent areas and would gradually return once construction is complete. Diversity of wildlife on-site is limited and species that utilize this area have adapted to living in conditions altered by humans.

Threatened, Endangered, and Sensitive Species – No federally-listed threatened or endangered species are known to occur at the Alternative 1 site; therefore, implementation of the Proposed Action at the Alternative 1 site is expected to have no effect on federally-listed species.

According to the NJDEP Natural Heritage Program, the Natural Heritage Database indicated the occurrence of species or habitat for the breeding population of the State-threatened Cooper's hawk (NJDEP, 2009a). While a large portion of the Alternative 1 site was previously wooded, the site was recently cleared by the current landowner in 2007, with only the trees immediately surrounding the existing farmhouse on the southeast corner of the property and a few others along the western and northern portion of the property remaining (see Figure 4-12). Follow up with the NJDEP Endangered and Nongame Species Program indicated that the determination for the presence of threatened or endangered species in the Natural Heritage Database is based on Landscape Mapping Uses which were based on 2002 Land Use/Land Cover data (Fowles, 2009). Because the Alternative 1 site was cleared in 2007 it was concluded that the 2002 Land Use/Land Cover data does not represent the current conditions and that nesting habitat for the Cooper's hawk is probably unlikely to exist on the Alternative 1 site (Fowles, 2009). Therefore, clearing the few remaining trees surrounding the farmhouse and implementing the Proposed Action on the Alternative 1 site is expected to have no effect on the Cooper's hawk.

With the Alternative 1 site no longer forested and with no water sources located on or adjacent to the site, it no longer provides preferred habitat for the eastern box turtle. However, with soils that are sandy/loamy and being adjacent to areas that are still wooded, the cleared site may still provide some potential nesting habitat for the eastern box turtle. While constructing the AFRC on this site could remove some potential nesting habitat for the turtle, the impacts would not be significant, for the species is widespread throughout the state and there is still ample nesting habitat adjacent to the site.

With the Alternative 1 site no longer forested it is also unlikely that the eastern king snake would be found on the site. During construction activities any snake(s) that may be present would likely actively avoid the area. Therefore, the proposed action would have no effect on the eastern king snake.

Because there are no water resources or wetland habitat located on or adjacent to the property, the Alternative 1 site does not provide suitable habitat for the great blue heron. Therefore, implementing the Proposed Action on the Alternative 1 site is expected to have no effect on the great blue heron.

Figure 4-12. Alternative 1 Site - September 2008

Looking northwest from Cross Keys Road

4.8.2.3 Alternative 2 – Erial Road

Vegetation – No significant adverse effects would be expected as a result of implementing the Proposed Action at the Alternative 2 site. The footprint of the AFRC at the Alternative 2 site would be sited so that the facilities would avoid the forested areas located in the northeast portion of the parcel; therefore, no trees would be removed. The footprint of the AFRC would be located on portions of the parcel that is currently used for crop production. No significant adverse effects to vegetation would be expected in these areas.

Wildlife – No significant adverse effects would be expected as a result of implementing the Proposed Action at the Alternative 2 site. Construction of the AFRC facility could disturb wildlife in the immediate area, particularly birds. Wildlife in the immediate area would scatter to adjacent areas and would gradually return once construction is complete. Siting of the proposed facilities would not require the removal of forested habitats.

Threatened, Endangered, and Sensitive Species – No federally listed threatened or endangered species are known to occur at the Alternative 2 site. Therefore, implementation of the Proposed Action at the Alternative 2 site is expected to have no effect on federally-listed species.

According to the NJDEP Natural Heritage Program, the Natural Heritage Database indicated the occurrence of species or habitat for the State-Species of Concern eastern box turtle and the great blue heron. Implementation of the Proposed Action on the Alternative 2 site would require the Army to purchase approximately 10 acres of the overall 34 acre parcel. Though the exact 10 acres to be purchased has not yet been determined, the Army would not include any forested wetlands or any portion of the unnamed tributary to the Great Egg Harbor River that could provide habitat to these species in its purchase. The AFRC would be constructed on the previously disturbed portion of the site currently being used as farmland, which would not result in any physical disturbance to wetlands or the tributary located on the rear of the parcel. All proposed improvements would try to avoid any designated buffer/transition area that could be applied to the forested wetland in the vicinity of the approximately 10 acres to be purchased. Should development encroach upon any designated wetland buffer/transition area, the Army would be required to undergo the New Jersey Freshwater Wetland Permit process to obtain any applicable permits necessary, and it is expected that the project would have no effect on the great blue heron or the state-listed species (eastern king snake, Fowler's toad and wood thrush) found within 1/4 mile of the project site.

The eastern box turtle nests in sandy and loamy soils, therefore it could move out of the forested wetlands and potentially nest in the soils of the existing farm from which the Army would purchase the approximately 10 acres. While constructing the AFRC on this site would remove some potential nesting habitat for the eastern box turtle, the impacts would not be significant since the species is widespread throughout the state, the property to be purchased is currently actively disturbed through farming practices, and a large portion of the overall 34 acres would remain as potential nesting habitat.

4.8.2.4 Preferred Alternative – Lakeland

Vegetation – No significant adverse effects would be expected as a result of implementing the Proposed Action at the Preferred Alternative site. Vegetation on site consists primarily of turfgrass with scattered trees along the property frontage along Woodbury-Turnersville Road and Salina Road. The footprint of the AFRC would require the removal of some trees within the wooded area in the northwestern portion of the property. The majority of the wooded area would remain intact and not be affected by the Proposed Action. Construction of the proposed AFRC would not cause disturbance to or encroach upon any wetlands and would avoid encroaching upon the associated 50-foot buffer to the maximum extent possible. However, should the proposed project encroach upon any designated wetland buffer/transition area, the Army would be required to undergo the New Jersey Freshwater Wetland Permit process to obtain any applicable permits necessary.

Wildlife – No significant adverse effects would be expected as a result of implementing the Proposed Action at the Preferred Alternative site. The site consists primarily of turfgrass, which provide little valuable wildlife habitat. Construction of the AFRC facility could temporarily disturb wildlife in the immediate area, particularly birds. Wildlife that utilizes the wooded area on the property would scatter to adjacent forested areas and some would gradually return once construction is complete. Siting of the proposed facilities would require removal of some trees within the wooded area in the northwestern portion of the property. Construction activities would not cause disturbance to wetland habitat.

Threatened, Endangered, and Sensitive Species – No federally-listed threatened or endangered species are known to occur at the Preferred Alternative site. Therefore, implementation of the Proposed Action at the Preferred Alternative site is expected to have no effect on federally-listed species.

According to the NJDEP Natural Heritage Program, the Natural Heritage Database indicated the occurrence of the State-Species of Concern great blue heron within 1/4 mile of the Preferred Alternative site. Implementation of the Proposed Action at the Preferred Alternative site would require the Army to purchase approximately 12 acres containing developed land, areas of turfgrass, and a small wooded area.

All proposed development would not occur in wetlands or in areas that could provide habitat to this species, and would avoid to the maximum extent possible the designated 50-foot buffer area associated with the wetlands adjacent to the northwestern portion of the site. The AFRC would be constructed mostly on the previously disturbed portion of the site currently occupied by the 4-H structures and the parking lot, and on the frontage of Woodbury-Turnersville Road. Should development encroach upon the designated wetland buffer area, the Army would be required to undergo the New Jersey Freshwater Wetland Permit process to obtain any applicable permits necessary. It is expected that the project would have no effect on the great blue heron found within 1/4 mile of the project site.

4.9 CULTURAL RESOURCES

This section presents information on buildings, sites, structures, districts, and objects eligible for or included in the National Register of Historic Places (NRHP); cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990; Native American sacred sites for which access is protected under the American Indian Religious Freedom Act (AIRFA) of 1978; archaeological resources as defined by the Archaeological Resources Protection Act of 1979; and archaeological artifact collections and associated records as defined by 36 CFR Part 79.

4.9.1 Affected Environment

The affected environment for cultural resources is the three alternative sites under consideration for implementing the Proposed Action: the Alternative 1 site at 389 Cross Keys Road, the Alternative 2 site at 320 Erial Road and the Preferred Alternative site in the Lakeland area of Gloucester Township at 295 Woodbury-Turnersville Road.

The three alternative sites are located in central Camden County, which contains both highly urbanized areas, including Cherry Hill and Camden, and rural locations such as the proposed location(s) for the AFRC. The project area is located in New Jersey's Coastal Plain physiographic province. The Coastal Plain is New Jersey's largest physiographic province, comprising approximately three-fifths of the state's entire geography. New Jersey's Coastal Plain consists of unconsolidated deposits of silt, clay and sand that range in age from the Upper Lower Cretaceous to the Miocene geological periods that date from approximately 90 million to 10 million years in age. In general, the Coastal Plain is relatively flat and level, with a slight ridge that forms the dividing line between the drainages that flow toward the Delaware River and those that flow toward the Atlantic Ocean. All three alternative locations are situated to the west of this ridge. However, both the Alternative 1 and Alternative 2 sites are located in close proximity to tributaries of the Great Egg Harbor River, which drains southeastward to the Atlantic Ocean, while the

Preferred Alternative site is located adjacent to an unnamed tributary of the South Branch of Big Timber Creek which drains into the Big Timber Creek and eventually into the Delaware River.

As each proposed site for the AFRC is located on land not currently owned by the Army, the management of cultural resources does not operate under a standard Integrated Cultural Resource Management Plan (ICRMP). Instead, the three alternative locations required investigations to determine the presence or absence of cultural resources within them. Within Camden County, numerous historic and prehistoric archaeological sites have been identified. Historic site types include 18th and 19th century historic residential and industrial sites while prehistoric site types span the range of prehistoric time periods from the Paleo-Indian Period (beginning earlier than circa [ca.] 10,800 before present [B.P) to the Woodland Period (terminating ca. 1600 Anno Domini [A.D.]). These cultural resources have been identified through the performance of a number of historic and recent cultural resource investigations within southern New Jersey

4.9.1.1 Prehistoric and Historic Background

Paleoindian Period: The earliest recognized prehistoric occupation of New Jersey dates to the Paleoindian period, characterized by the use of distinctive fluted lanceolate projectile points. While over 200 such fluted points have been found throughout New Jersey, the largest numbers have been located in the Delaware River drainage, and almost all of these were surface finds.

During the Paleoindian period the environment of the Coastal Plain was different from that of today. Preserved pollen remains and associated radiocarbon dates suggest a gradual warming trend that brought about the retreat of the Pleistocene glaciers beginning around 17,000 BP. The general pattern of ecological succession suggests a predominantly herbaceous vegetation following glaciation (mosses, lichens, and sedges). This was succeeded by open parkland vegetation, and then by mixed forest zones with pine and spruce predominating at about 13,000 BP. In southern New Jersey pine had begun to dominate sometime after 12,000 BP, and this transition roughly coincided with the beginning of the Paleoindian period. During the Paleoindian period sea level was lower then at present, and as a result the New Jersey shoreline lay some 50 miles east of its current position.

Paleoindian subsistence patterns emphasized hunting and gathering by small, highly mobile bands, with the primary prey being megafauna, such as the mastodon, and fishing and foraging for vegetal foods comprising the remainder of the diet. Although most of the fluted projectile points found in the region have been recovered as isolated finds, at least two important, well-defined Paleoindian sites have been located along the coastal shore of New Jersey.

Archaic Period: The ecological changes brought about by warmer Holocene climates subsequently encouraged population migrations and the development of the subsistence strategies that characterize the Archaic period (10,000 to 3000 BP). A wider variety of artifact types is associated with the Archaic period than with the Paleoindian period. This suggests a greater diversity of subsistence and technological activities although hunting still appears to have been the major focus. Based on changes in material culture and subsistence patterns, the Archaic period in New Jersey is commonly divided into three subperiods: Early Archaic, Middle Archaic, and Late Archaic. A fourth subperiod, the Terminal Archaic or Transitional period, has also been defined.

The Early Archaic period (10,000 to 8000 BP) is characterized by corner-notched, stemmed, and bifurcate-stemmed projectile points. Numerous locations on the Coastal Plain have yielded diagnostic artifacts of the Early Archaic, often found in association with Paleoindian artifacts. Although the transition from the Late Paleoindian to the Early Archaic period was marked by a change in projectile point morphology, it has been suggested that such a shift does not necessarily indicate a new way of life. It has been argued that Late Paleoindian populations and Early Archaic peoples continued the same basic adaptation and that change in projectile point morphology implies merely a technological rather than an economic shift.

Middle Archaic remains, dated 8000 to 6000 BP, are extremely rare in the region, possibly owing to unclear typological definitions for this period. Traces of this period that have come to light suggest the exploitation of a broader resource base than in earlier periods. In addition, a change in lithic material preferences occurred, with a greater reliance on argillite.

Sites associated with the Late Archaic period (6000 to 4500 BP) are more common compared to those of earlier periods, leading to the inference by some researchers of an increase in Native American populations at this time. In some instances, Late Archaic base-camp sites appear to represent occupations of longer duration. A variety of narrow-bladed notched and stemmed projectile points, including Lackawaxen, Poplar Island, Lamoka, and Sylvan types, are diagnostic of the Late Archaic period. Tool assemblages from Late Archaic sites also include atlatl weights, groundstone and pecked-stone implements, heavy and light woodworking tools, netsinkers, and food-grinding implements. Milling stones and other food-grinding implements attest to an increased reliance on gathered wild plants; netsinkers, stone-boiling features, and faunal remains indicate the importance of fishing and shell fishing.

The Terminal Archaic or Transitional period (4500 to 3000 BP) is distinguished by broad-bladed projectile points, including Susquehanna and Perkiomen types; the flared-stem Orient Fishtail point also

appeared during the Terminal Archaic and persisted well into the following Woodland period. The appearance of soapstone or steatite vessels and artifacts on New Jersey Coastal Plain sites of this period provides evidence of interregional trade and may suggest residential stability, since stone bowls are items that are not easily transported from site to site.

Woodland Period: The Woodland period (3000 BP/1150 BC to AD 1600) is divided into three successive subperiods: Early, Middle, and Late. The Early Woodland (1150 BC to AD 1) is traditionally distinguished from the preceding Late Archaic period by the introduction of ceramic vessels. Trends toward greater sedentism and subsistence specialization begun during the Terminal Archaic continued and were eventually accompanied by experimentation with cultigens. The earliest ceramics are termed the Marcey Creek and Ware Plain types and consist of flat-bottomed, straight-sided vessels with lugs or handles. These are thought to have been followed by the Vinette I conical-based, coarse-gritted, coil-constructed vessels, the interiors and exteriors of which are covered with the marks of cord-wrapped paddles. The Early Woodland Meadowood projectile point is also fairly widespread on sites of this period in New Jersey.

During the Middle Woodland period (AD 1 to 700), coarse cordmarked pottery was replaced by net-impressed and, at least at the Abbott Farm Site near Trenton, zoned ceramics. Rossville, Fox Creek, and Jack's Reef are the predominant projectile point types recognized. Pestles, hammer stones, and anvil stones are important processing implements recovered from sites of this period, while the presence of netsinkers attests to the continued exploitation of fish resources.

The Late Woodland period (AD 700 to 1600) is well represented throughout New Jersey. The largest sites are usually located on major rivers, and probably represent base camps that may have been occupied during most of the year. Smaller sites are abundant on tributaries and are also located near natural springs. These sites probably functioned as temporary or seasonal camps. The practice of hoe-type horticulture was well established, although hunting, gathering, and fishing continued as major subsistence activities.

Except for stylistic changes, the Late Woodland stone toolkit remained similar to that of earlier periods and reflects the functional diversity associated with exploiting a broad resource base. The utilization of a wide range of lithic materials coincided with sedentary settlements and the exploitation of immediately available resources. Diagnostic artifacts of the Late Woodland period are triangular points, collared and collarless ceramic vessels bearing incised geometric motifs and cord marking, and a variety of ground-stone and chipped- and pecked-stone tools.

Historical Development of Gloucester and Winslow Townships:

Gloucester Township, New Jersey was originally one of the earliest recognized townships in Gloucester County, New Jersey. Named for Gloucester, England, the township was formed in 1695, but not officially incorporated until 1798. In its earliest configuration, the Township extended from the Delaware River to the Atlantic Ocean. However, over time portions of the Township have been separated away to become Egg Harbor Township, Berlin, and Union Township, among others. When Camden County split from Gloucester County in 1844, Gloucester Township officially became a part of Camden County.

During the eighteenth century, settlement within Gloucester and Township, including what is now Winslow Township, was sparse and consisted primarily of English settlers. However, not until the nineteenth century did any large-scale development come to the region. By 1886, Gloucester Township was comprised of thirteen distinct villages – Brownstown, Blackwood, Chew's Landing, Clementon, Davistown, Kirkwood, Lakeside Park, Lindenwald, Mechanicsville, Spring Mills, Watsontown, and White Horse. Due to poor soils in the township, agriculture did not comprise a major stake in the local economy until the late nineteenth century when marl and other fertilizing agents grew in popularity. In response to the lack of agriculture, early industry within the region capitalized on the natural resources of the area through the lumbering of local cedar trees, and the manufacture of glass from the local sandy soils. The goods produced by these local industries were shipped to the regional markets at Philadelphia, and later to Camden, along an established road network, and a growing railroad network. The emergence of railroads within the area began in the early nineteenth century, and included the Camden and Atlantic Railroad, and the Philadelphia and Atlantic City Railroad.

In 1845, the southeast portion of Gloucester Township was set aside for the formation of Winslow Township. By 1886, Winslow Township was comprised of eleven villages – Sicklerville, Williamstown Junction, Wilton, Tansboro, Cedar Brook, Braddock, Blue Anchor, Ancora, Elm, Winslow Junction, and Winslow. Within the Township, the soils were poorly suited for cereal agriculture, consisting largely of swamps and stands of cedar wood. Like Gloucester Township, Winslow capitalized on the available local resources. However, by the late nineteenth century, Winslow Township had moved its agricultural pursuits towards the cultivation of fruits. The western portion of the Township was traversed by the Williamstown Branch of the Philadelphia & Atlantic City Railroad, while the main line of the Railroad crossed the northern portion of the Township.

4.9.1.2 Status of Cultural Resource Inventories and Section 106 Consultations

No prior cultural resource investigations have been conducted at the three locations considered for the AFRC and no prior archaeological sites or historic architectural structures had been identified at the sites. As part of the analysis for this project a Phase I/II cultural resource investigation was conducted at the Alternative 1 site and the Alternative 2 site (U.S. Army, 2009), as well as at the Preferred Alternative site (U.S. Army, in prep). The results of the investigation are presented/summarize in the environmental consequences section for each alternative.

Research conducted at the New Jersey State Museum (NJSM) and the New Jersey Historic Preservation Office, both located in Trenton, revealed a total of five archaeological sites within a one-mile radius from the three alternative sites. One historic archaeological site, recorded as 28-Ca-116, was identified approximately 3,000 feet east of the Alternative 1 site. Two prehistoric archaeological sites, recorded as 28-Ca-82 and 28-Ca-83, were located just over one mile southeast of the Alternative 2 site. Site 28-Ca-116 contained 18th to 19th century historic archaeological deposits, including a subsurface feature comprised of fill soils and a single piece of slip-trailed redware. There was no descriptive information found for the two prehistoric sites. There are two archaeological sites within one mile from the Preferred Alternative site. One site, recorded as 28-Ca-56, was identified approximately 2,000 feet north of the Preferred Alternative site. A prehistoric archaeological site, recorded as 28-Gl-324, was located 5,100 feet to the southeast. Site 28-Ca-56 consists of a small prehistoric lithic procurement site consisting of jasper flakes and fire-cracked rock located on a high bank along the west side of the South Branch of Big Timber Creek and within the Lakeland complex. No descriptive information was available for Site 28-Gl-324 outside of it being a prehistoric archaeological site.

Section 106 Consultations – As part of the NEPA process an initial agency coordination letter was sent to the New Jersey State Historic Preservation Officer (NJSHPO) on April 10, 2009 describing the Proposed Action for the Camden BRAC AFRC project and the findings of the Phase I/II Cultural Resource Investigations for the Alternative 1 and Alternative 2 sites, with follow-up phone correspondence occurring on May 19, 2009 (see Appendix B). By letter dated August 20, 2009, the NJSHPO responded to the Army (see Appendix B). The NJSHPO's concurrence with the Army's determination is detailed in the Environmental Consequences section below. By letter dated March 8, 2010, the Army sent an initial agency coordination letter to the NJSHPO regarding the Preferred Alternative site (see Appendix B). By correspondence dated April 9, 2010 the NJSHPO concurred that a Phase 1B Archaeological survey of the Preferred Alternative site was appropriate and also requested that an architectural survey be conducted (see Appendix B). The Army completed the archaeological and architectural surveys in March, 2010 and

on May 28, 2010 sent the NJSHPO the draft Phase I/II Cultural Resource Investigation report along with a corresponding letter seeking the NJSHPO's concurrence with the Army's determination that implementing the proposed action at the Preferred Alternative site would have no adverse affect on any resources on or eligible for inclusion on the NRHP (see Appendix B). Correspondence from the NJSHPO will be included in Appendix B when received.

4.9.1.3 Native American Resources

To date, no traditional cultural properties or Native American sacred sites have been recorded at the proposed project sites.

On April 10, 2009 initial coordination letters describing the Proposed Action and the findings of the Phase I/II Cultural Resource Investigations were sent to the Delaware Nation and the Stockbridge-Munsee Tribe (see Appendix B). On April 27, 2009 an initial coordination letter was also sent to the Shawnee Tribe (see Appendix B). These groups are not resident in New Jersey, but have expressed an interest in New Jersey and may be knowledgeable about Native American sacred sites or traditional cultural properties in the ROI. Follow-up correspondence was sent to all three tribes on June 15, 2009 (see Appendix B). By letter dated July 8, 2009 the Stockbridge-Munsee Tribe indicated that the proposed project would not impact any sites of interest to the tribe. By letter dated September 28, 2009 the Delaware Nation indicated that the proposed project would not impact any sites of interest to the Delaware Nation. To date no responding correspondence has been received from the Shawnee Tribe. By letters dated March 8, 2010 initial coordination letters regarding the Preferred Alternative site were sent to the Delaware Nation, the Stockbridge-Munsee Tribe, and the Shawnee Tribe. By correspondence dated March 18, 2010 the Stockbridge-Munsee Tribe indicated that the Preferred Alternative site is outside their area of interest. By correspondence dated April 22, 2010 the Delaware Nation indicated that implementing the Proposed Action under the Preferred Alternative would not impact any sites of interest to the tribe (see Appendix B for these two letters). To date, no correspondence has been received from the Shawnee Tribe. On June 7, 2010 the Army sent the Delaware Nation the draft Phase I/II Cultural Resource Investigation report for their review (see Appendix B). Appendix B will include responding correspondence from the tribes when it has been received.

4.9.2 Environmental Consequences

Potential impacts to cultural resources have been evaluated based on the extent of resources that are eligible for or listed on the NRHP in the area. This analysis parallels the procedures for determining the

effects of a Federal undertaking upon historic properties under 36 CFR 800 implementing Section 106 of the NHPA.

For each valid alternative in the EA, an assessment has been made of what NRHP resources, if any, are within its potential area of impact and the reasonably foreseeable nature and extent of any impact. Usually, Cultural Resource Management Plans and underlying historic architectural and archaeological studies for Federal installations provide sufficient data to make this assessment. Where such information is inadequate, the requirement for additional effort to identify historic properties is noted.

The following provides an explanation of the characterization of impacts to cultural resources as "no effect, not significant, and significant" in comparison with the terminology of "no effect, no adverse effect, and adverse effect" used in NHPA.

Section 106 Scale

Per 36 CFR 800.16 (i) *effect* means alteration to the characteristics of a historic property that qualify it for inclusion or eligibility for the National Register. Per 36 CFR 800.5 (a) (1), the effect becomes *adverse* when "an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." Examples of adverse effects include: the physical destruction of all or part of the historic property; an alteration of the property that is not consistent with the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR 68); the removal of the property from its historic setting; changing the character of the property's use or of the physical features of its setting that contribute to its significance; and the introduction of visual, aural, and atmospheric elements that diminish the integrity of the property's significant historic features.

Environmental Impacts to Cultural Resources vs. the Section 106 Scale

No effect – This equates to *no effect* for Section 106.

No Significant Effect – An impact that alters or has the potential to alter the historic characteristics or setting of an NRHP property but does not diminish its integrity. This equates to *no adverse effect* for Section 106.

Significant Effect – An impact that diminishes or destroys the integrity of an NRHP property. This equates to *adverse effect* for Section 106.

In the practice of Section 106 consultation, adverse effects can often, but not always, be mitigated, when the loss of integrity of the NRHP resource is justified, balanced against other competing interests. The results of the consultation process are usually memorialized in a Section 106 Memorandum of Agreement containing mitigation stipulations. Neither the initial identification of a significant impact to cultural resources or a determination of adverse effect under Section 106 necessarily precludes a FNSI under NEPA. The loss of NRHP cultural resources would have to be major in scale and importance and without any acceptable feasible mitigation measures to negate a FNSI.

4.9.2.1 No Action Alternative

Under the No Action Alternative, there would be no effect to cultural resources.

4.9.2.2 Alternative 1 – Cross Keys Road

Archaeology – An archaeological survey of the Alternative 1 site consisted of excavating a total of 187 shovel tests. In total, the excavations within the Alternative 1 site recovered 52 artifacts, of which three represented prehistoric archaeological material. One artifact, situated in the southern portion of the property near Cross Keys Road, was identified as a single fragment of quartz block shatter. Eight radial shovel tests excavated in the vicinity of the artifact did not encounter any additional prehistoric artifacts, and as such the artifact has been interpreted as an isolated find. Two additional prehistoric artifacts, both chert flakes, were found approximately 5 meters apart at the northern edge of the property, more than 250 meters away from the quartz block shatter. The presence of two prehistoric artifacts within 5 meters of one another meets NJSM guidelines for registration as an archaeological site, with the archaeological site registered as the Hoffman Pig Farm Prehistoric Site (28-Ca-122). Thirteen radial and twelve judgmental shovel tests as well as one 1x1-meter test unit were excavated within the vicinity of the two flakes to determine the vertical and horizontal extents of the prehistoric site. The additional shovel tests and the test unit encountered no additional prehistoric artifacts, or any subsurface features or deposits. In addition, all of the prehistoric artifacts were recovered from either the plowzone, or the upper portions of the B-Horizon. Given the limited cultural material encountered within the site, the lack of diagnostic artifacts, the and lack of any prehistoric features, the Hoffman Farm Prehistoric Site (28-Ca-122) did not yield and is unlikely to yield information important in prehistory or history (Criterion D of 36 CFR 60.4, Criteria for evaluation) and therefore is recommended as not eligible for listing on the NRHP. By correspondence dated August 20, 2009 the NJSHPO indicated that they concurred with the Army's determination that implementing the Proposed Action under Alternative 1 would have no adverse effect on NRHP listed or eligible resources(see Appendix B).

Built Environment – Construction of the AFRC at the Alternative 1 site would have no adverse effect on any historic architectural resources within view of the proposed AFRC facility. All structures with a direct view of the Alternative 1 site have been evaluated and determined ineligible for listing on the NRHP. By correspondence dated August 20, 2009 the NJSHPO indicated that they concurred with the Army's no adverse effect determination for implementing the Proposed Action under Alternative 1. Therefore, for the built environment, there would be no effect upon NRHP listed or eligible resources.

4.9.2.3 Alternative 2 – Erial Road

Archaeology – An archaeological survey of the Alternative 2 site involved excavating a total of 354 shovel tests, of which four shovel tests contained prehistoric archaeological material. Three of the artifacts, a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake, meet the NJSM guidelines for registration as an archaeological site. The site was registered with the NJSM as the Andrews Prehistoric Site (28-Ca-121). The artifacts recovered from the Andrews Prehistoric Site have yielded new data with regard to the prehistoric occupations of the surrounding area There is a lack of known prehistoric archaeological sites within one-mile of the Andrews Prehistoric Site and the presence of a diagnostic (Late Archaic) projectile point along with two additional prehistoric artifacts provides new information about the Native American exploitation of this section of the Great Egg Harbor River drainage. Therefore, the Andrews Prehistoric Site is recommended eligible for listing on the NRHP under Criterion D (36 CFR 60.4, Criteria for evaluation); the NJSHPO issued concurrence with the NRHP-eligibility recommendation for the Andrews Prehistoric site on August 20, 2009 (see Appendix B). Extensive subsurface testing within the limits of the Andrews Prehistoric Site, consisting of one systematic and thirteen radial shovel tests at 5-meter intervals, eight judgmental shovel tests, and a 1x1-meter excavation unit (totaling approximately 6.5 square meters of ground surface), recovered only the three prehistoric artifacts and no features or buried ground surfaces. Due to the paucity of archaeological material recovered from the Andrews Prehistoric Site, it is unlikely that further subsurface excavations would yield additional information. Therefore, the Proposed Action would have no significant effect on historic properties as no additional information could be recovered from the Andrews Prehistoric Site and no further archaeological investigations are recommended for the proposed undertaking. By correspondence dated August 20, 2009 the NJSHPO indicated that they concurred with the Army's no adverse effect determination for implementing the Proposed Action under Alternative 2 (see Appendix B).

Built Environment – Construction of the AFRC would have no adverse effect on any historic architectural resources within view of the proposed AFRC facility at the Alternative 2 site. All structures

with a direct view of the Alternative 2 site have been evaluated and determined ineligible for inclusion on the NRHP. By correspondence dated August 20, 2009 the NJSHPO indicated that they concurred with the Army's no adverse effect determination for this site. Therefore, for the built environment, there would be no effect upon NRHP listed or eligible resources.

4.9.2.4 Preferred Alternative –Lakeland

Archaeology – An archaeological survey of the Preferred Alternative site involved excavating 313 shovel tests, of which 120 shovel tests contained historic period artifacts, 3 shovel tests contained prehistoric artifacts and 3 shovel tests contained both historic and prehistoric artifacts. A total of 958 historic-period artifacts were recovered during the subsurface archaeological survey. These historic artifacts were largely found in association with fill soils that were indicative of either historic or modern sheet middens likely associated with the demolition of former outbuildings within the property.

With regard to the prehistoric artifacts, one diagnostic prehistoric artifact, a chert Madison-type projectile point (c.1450 – 1600 A.D.) and five pieces of quartz and jasper débitage were recovered during the subsurface survey. None of the artifacts were found within 15-meters of another and all but the chert Madison-type projectile point, which was encountered within a fill deposit, was encountered in either plowzone or B-horizon stratigraphic contexts. Radial shovel tests excavated additional shovel tests at 3.75 meter intervals in the vicinity of the diffusely scattered prehistoric artifacts did not encounter any additional prehistoric artifacts. The diagnostic artifacts suggest a former prehistoric site occupation associated with the Woodland period of New Jersey's prehistory.

The historic and prehistoric archaeological deposits encountered within the property have been registered with the NJSM as the Lakeland Multicomponent 1 Site (28-Ca-123). Given that the historic archaeological deposits have not provided new information to contribute to the understanding of local, regional or State history (Criterion D of 36 CFR 60.4, Criteria for evaluation), the historic component of the Lakeland Multicomponent 1 Site is not recommended as eligible for listing on the NRHP. Further, given that the diagnostic artifact from the prehistoric component of the site was recovered from fill deposits, the prehistoric component to the Lakeland Multicomponent 1 Site does not meet the NJSM criteria for registration as a prehistoric archaeological site, and is therefore not recommended as eligible for listing on the NRHP. In seeking the NJSHPO's concurrence with the Army's determination, a copy of the Phase I/II Cultural Resources Investigation report was sent to the NJSHPO on May 28, 2010 for their review and they were also provided a copy of this EA.

The Proposed Action under the Preferred Alternative would have no effect on NRHP listed or eligible resources for the areas subjected to the archaeological subsurface survey. A portion of the Proposed Action is located within an area covered by asphalt paving. Historic background research, including aerial images, suggest that the asphalt-paved parking lot within the property is sensitive for potentially significant historic archaeological deposits associated with a pre-1930s barn associated with the County Farm Complex. Consistent with 36 CFR 800.13 (post-review discoveries), if the Preferred Alternative site is selected for implementing the Proposed Action, the construction specifications for the AFRC facility would include a provision for treating any unanticipated archaeological resources that may be discovered during the removal of the asphalt parking lot. Unanticipated archaeological discoveries would not include the foundation or remnants of the historic barns as these barns are known from historic mapping of the area. Unanticipated archaeological resources would include stone lined shafts, wells, privies or cisterns that would have functioned as trash receptacles and would not have been mapped on historic maps of the County Farm Complex.

Built Environment – A historic architectural survey of the Preferred Alternative site and the surrounding area evaluated the historic significance of 17 structures 50 years in age or older, including the two 4-H barns located on the site. The 4-H snack bar building did not meet the 50 year age criteria and was not evaluated for NRHP eligibility. The two 4-H barn buildings were determined ineligible for inclusion on the NRHP. Construction of the AFRC would have no adverse effect on any historic architectural resources within view of the proposed AFRC facility at the Preferred Alternative site, as all structures with a direct view of the site have been evaluated and determined ineligible for inclusion on the NRHP. For the built environment, there would be no effect upon NRHP listed or eligible resources. In seeking the NJSHPO's concurrence with the Army's determination, a copy of the Phase I/II Cultural Resources Investigation report was sent to the NJSHPO on May 28, 2010 for their review and they were also provided a copy of this EA.

4.10 SOCIOECONOMICS

The Affected Environment and Environmental Consequences sections of the Socioeconomics resource area of this EA are presented in limited detail. This is due to the fact that none of the personnel relocating to the proposed AFRC will be permanently moving to the area from outside the ROI. Because there would be no change in the baseline population two resources, *Housing* and *Quality of Life*, which are normally addressed in Socioeconomics, are not evaluated in this EA.

4.10.1 Affected Environment

The socioeconomic ROI is Camden County. This county comprises the area in which the predominant socioeconomic effects of the Proposed Action would take place. The geographical extent of the ROI is based on the location of businesses that would provide goods and services to the new facilities and its employees.

The baseline year for the socioeconomic analysis is 2007, and though the analysis tries to reflect the most current conditions much of the economic and demographic data for the ROI are only available through the years 2005 and 2006. The description of the affected environment is based on the most recent data available to accurately reflect the current economic and social conditions of the ROI. Due to the fact all of the personnel relocating to the proposed AFRC would not be moving to the area only a brief overview of the regional economic activity and demographic data and trends is presented.

4.10.1.1 Economic Development

4.10.1.1.1 Regional Economic Activity

The ROI's regional economy is composed of non-farm industries such as government and other government enterprises, manufacturing, retail, professional and technical services, health care and social services, finance and insurance, construction, and accommodation and food services. These sectors account for virtually 100 percent of jobs in the ROI County. Three sectors dominate the regional economy: healthcare and social assistance account for 37,676 jobs; government and government enterprises account for 37,331 jobs; and retail trade accounts for 32,510 jobs; in total, these sectors account for 107,517 out of the total 276,052 jobs (Indiana Stats, 2006). Farming jobs, in the ROI are practically non-existent, accounting for one-tenth of one percent of all jobs.

In 2007 the unemployment rate for the ROI was 4.7 percent which was slightly greater than the national unemployment rate of 4.6 percent during the same period. It was also somewhat higher than the state of New Jersey's unemployment rate of 4.2 percent. The ROI's annual unemployment rate has decreased by more than 17 percent since 2000 (Stats Indiana, 2007a and 2007b).

4.10.1.2 Demographics

U.S. Census Bureau confirmed the ROI's population to be 513,769 inhabitants in 2007. On average, the ROI has experienced a 7 percent growth rate over the past three decades (Stats Indiana, 2007c and 2007d). Population data for the ROI, New Jersey, and the U.S. overall are provided in Table 4-10 for comparison purposes.

Table 4-10. Population Trends, 1980 -2007

Location	1980	1990	2000	2007
Camden County (ROI)	471,650	502,824	508,932	513,769
New Jersey	7,365,011	7,747,750	8,414,350	8,685,920
United States	226,542,250	248,790,925	281,421,906	301,621,157

Source: Stats Indiana, 2007c and 2007d

4.10.1.3 Environmental Justice

On February 11, 1994, President Clinton issued EO 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. The EO is designed to focus the attention of federal agencies on the human health and environmental conditions in minority communities and low-income communities. Environmental justice analyses are performed to identify potential disproportionately high and adverse impacts from proposed actions and to identify alternatives that might mitigate these impacts. Data from the U.S Department of Commerce 2000 Census of Population and Housing were used for this environmental justice analysis. Minority populations included in the census are identified as Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and other Pacific Islander, Hispanic, of two or more races, and other. Poverty status, used in this EA to define low-income status, is reported as the number of persons with income below the poverty level. The 2000 Census defines the poverty level as $8,794 of annual income, or less, for an individual, and $17,603 of annual income, or less, for a family of four.

In 2005, the median household income was $53,239 for Camden County residents compared to $61,694 for the state of New Jersey. The average poverty rate for the ROI in 2005 was 11.9 percent, which is less than the national poverty rate of 12.3 percent, but greater than New Jersey's state-wide poverty rate of 8.7 percent. In 2007, the ROI's population was comprised of the following ethnic groups: 72.3 percent white, 20.6 percent black, and 11.9 percent Hispanic. Note that these figures do not add to exactly 100 percent because Hispanics may be counted as white, black, and/or Hispanic by the U.S. Census Bureau, and hence there is a level of "double-classification". The elderly (65 plus) accounted for 12 percent of the ROI's population and the median age in the county is 37.1 (Stats Indiana, 2007c, 2007d, Stats Indiana, 2005a and 2005b; and U.S. Census Bureau, 2006).

4.10.1.4 Protection of Children

On April 21, 1997, EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, was issued. This EO directs each federal agency to ensure that its policies, programs, activities, and

standards address disproportionate risks to children that result from environmental health risks or safety risks. EO 13045 recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks. These risks arise because children's neurological, immunological, digestive, and other bodily systems are still developing; children eat more food, drink more fluids, and breathe more air in proportion to their body weight than adults; children's size and weight may diminish their protection from standard safety features; and children's behavior patterns make them more susceptible to accidents because they are less able to protect themselves. For example, elevated blood lead levels in children are associated with development impairments, including reductions in IQ. Young children in particular are at higher risks for exposure to lead based paint and lead contaminated soils because of their behavioral traits. Therefore, to the extent permitted by law and regulations, and consistent with the agency's mission, President Clinton directed each federal agency to (1) make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children, and (2) ensure that the agency's policies, programs, and standards address disproportionate health risks to children that result from environmental health risks or safety risks. Examples of risks to children include increased traffic volumes and industrial or production-oriented activities that would generate substances or pollutants children may come into contact with or ingest. Actions or alternatives indicating potential disproportionate risks to children will be identified and addressed in the Environmental Consequences Section of this EA in Section 4.10.2.2.4, Section 4.10.2.3.1 and Section 4.10.2.4.1.

Two residential areas are located to the west of the Alternative 1 site. Access to these areas is via secondary roads off of Kearsley Road which intersects with Cross Keys Road to the southwest of the proposed project site. At the Alternative 2 site, there is a children's learning center to the southwest more than 750 feet from the boundary of the site, several residences adjacent to the site to the northwest and an apartment complex to the southeast of the site. At the Preferred Alternative site, there are Township baseball fields directly across Salina Road to the south of the site.

4.10.2 Environmental Consequences

The economic effects of implementing the Proposed Action are estimated using the Economic Impact Forecast System (EIFS) model, a computer-based economic tool that calculates multipliers to estimate the direct and indirect effects resulting from a given action. Changes in spending and employment associated with the renovation of housing represent the direct effects of the action. Based on the input data and calculated multipliers, the model estimates changes in sales volume, income, employment, and population in the ROI, accounting for the direct and indirect effects of the action.

For purposes of this analysis, a change is considered significant if it falls outside the historical range of ROI economic variation. To determine the historical range of economic variation, the EIFS model calculates a rational threshold value (RTV) profile for the ROI. This analytical process uses historical data for the ROI and calculates fluctuations in sales volume, income, employment, and population patterns. The historical extremes for the ROI become the thresholds of significance (i.e., the RTVs) for social and economic change. If the estimated effect of an action falls above the positive RTV or below the negative RTV, the effect is considered to be significant. Appendix C discusses this methodology in more detail.

4.10.2.1 No Action Alternative

No direct or indirect effects would be expected. Under the No Action Alternative, the military population and expenditures would remain unchanged from baseline levels and no new construction would take place. Therefore, economic activity levels and ROI population growth would be the same as under the baseline conditions. In addition, there would be no disproportionately high and adverse impacts to minority or low income populations. Hence, the No Action Alternative would not result in any environmental justice impacts.

4.10.2.2 Alternative 1 – Cross Keys Road

4.10.2.2.1 Economic Development

Minor direct and indirect beneficial effects would be expected under the Proposed Action**.**

The total number of personnel relocating to the proposed AFRC would be 364, of which 347 are reservists, and 17 of whom are full-time personnel. It is assumed that all of the 364 personnel are currently living within the ROI, including the 131 reservists and 3 full-time personnel associated with the NJARNG who are coming from neighboring Burlington County. Therefore, there would be no new incoming personnel to the ROI.

Construction expenditures on goods and services, equipment, and salaries under the Proposed Action are expected to be the major contributor to increased sales and employment, due to the associated increase in expenditures on labor and materials during the construction period, although this would be of a short-term nature. These effects are assessed to be minor direct and indirect beneficial effects of the Proposed Action. The estimated construction start date is July 2010 with an estimated construction completion date of January 2012. It is assumed that the construction period will be a total of 19 months with $20,954,000 in expenditures for land acquisition and construction.

The Proposed Action would generate an estimated 93 direct and 238 induced jobs for a total of 331 jobs created within the ROI. This increase in employment would represent a 0.13 percent increase in the region's employment levels, and would fall far below the positive RTV of 3.59 percent. It should be noted that employment associated with construction activities would be temporary in nature and would not extend beyond 2012. The Proposed Action would also generate minor positive changes to other economic measures in the area, including a 0.36 percent increase in sales volume for a total of $74,596,240 within the ROI, and a 0.11 percent increase in regional personal income. Again, these changes are very minor and do not exceed the positive RTVs for their respective categories. Tables 4-11, 4-12 and 4-13 provide summaries of the EIFS model inputs, outputs and RTV values respectively.

Table 4-11. Forecast Input for the EIFS Model

EIFS REPORT Camden, NJ – Forecast Input	
Change In Local Expenditures	$20,954,000
Change In Civilian Employment	0
Average Income of Affected Civilian	$0
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	$0
Percent of Military Living On-base	0
Employment Multiplier	3.56
Income Multiplier	3.56

Table 4-12. EIFS Report for Camden, NJ AFRC – Forecast Output

Forecast Output		
Employment Multiplier	3.56	
Income Multiplier	3.56	
Sales Volume – Direct	$20,954,000	
Sales Volume – Induced	$53,642,240	
Sales Volume – Total	$74,596,240	0.36%
Income – Direct	$4,040,464	
Income – Induced	$10,343,590	
Income – Total (place of work)	$14,384,050	0.11%
Employment – Direct	93	

Forecast Output		
Employment – Induced	238	
Employment – Total	331	0.13%
Local Population	0	
Local Off-base Population	0	0%

Table 4-13. EIFS Report for Camden, NJ AFRC – RTV Summary

RTV Summary				
	Sales Volume	**Income**	**Employment**	**Population**
Positive RTV	12.37%	11.3%	3.59%	1.66%
Negative RTV	-5.23%	-3.96%	-4.21%	-0.34%

4.10.2.2.2 Demographics

No significant direct or indirect effects would be expected. Under the Proposed Action, there would be no incoming military or civilian personnel moving into the area from outside the ROI; therefore there would be no changes in the population of the ROI.

4.10.2.2.3 Environmental Justice

No effects would be expected. The Proposed Action would not result in adverse impacts on any demographic group residing or working within the economic ROI. Therefore, there would be no disproportionately high and/or adverse impacts on minority populations or low income populations.

4.10.2.2.4 Protection of Children

No direct or indirect effects would be expected. There are two residential areas located to the west of the Alternative 1 site. The Army facilities would be fenced from general access and during construction activities all measures necessary would be taken to ensure there is no public access to the site. While routine vehicle maintenance operations (e.g. oil changes etc.) would be conducted as part of normal operations at the facilities, all hazardous materials would be handled and stored in compliance with federal, state, and local laws and regulations governing the use of and reporting requirements for hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through the Defense Reuse and Marketing Organization (DRMO). Cross Keys road is a major two–lane thoroughfare and is scheduled to be expanded to a four-lane thoroughfare in the future and access to the residential areas is via a secondary road off of Cross Keys Road. As a result, increased traffic volume on Cross Keys Road would not have impacts on children residing in the residential areas. Therefore, there

would be no adverse impacts or disproportionate effects on children from implementing the Proposed Action under Alternative 1.

4.10.2.3 Alternative 2 – Erial Road

Under the Erial Road Alternative, the direct and indirect effects on economic development, demographics, and environmental justice would be similar to Alternative 1.

4.10.2.3.1 Protection of Children

No direct or indirect effects would be expected. There is a children's learning center to the southwest, which is more than 750 feet from the boundary of the site, and several residences adjacent to the site to the northwest, as well as an apartment complex to the southeast of the site. The Army facilities would be fenced from general access, and during construction activities all measures necessary would be taken to ensure that there is no public access to the site. While routine vehicle maintenance operations (e.g. oil changes etc.) would be conducted as part of normal operations at the facilities, all hazardous materials would be handled and stored in compliance with federal, state, and local laws and regulations governing the use of and reporting requirements for hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through the DRMO. Erial Road gives access to the residential areas via secondary roads and as a result, the increased traffic volume on Erial Road would have no impacts on children residing in the residential areas nor those attending the children's learning center. Therefore, there would be no adverse impacts or disproportionate effects on children from implementing the Proposed Action under Alternative 2.

4.10.2.4 Preferred Alternative – Lakeland

Under the Preferred Alternative, the direct and indirect effects on economic development, demographics, and environmental justice would be similar to Alternatives 1 and 2.

4.10.2.4.1 Protection of Children

No direct or indirect effects would be expected. During construction all measures necessary to protect children in the area and ensure no public access to the site would be implemented, including fencing and signage. Further, upon completion, the Army facilities would be fenced from general access. While routine vehicle maintenance operations (e.g. oil changes etc.) would be conducted as part of normal operations at the facilities, all hazardous materials would be handled and stored in compliance with federal, state, and local laws and regulations governing the use of and reporting requirements for

hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through the DRMO. There are county baseball facilities located across the street from the Preferred Alternative site; however, no impact on children would be expected. Increased traffic volume on Salina or Woodbury-Turnersville Roads would be negligible and would have no impacts on children accessing the county's baseball facilities. These roads currently provide access to many county facilities, including the 4-H facilities that would be relocated if the Proposed Action was implemented at the Preferred Alternative site. While the 4-H facilities would be demolished if the Preferred Alternative site were selected for implementing the Proposed Action, the County would relocate/construct new facilities minimizing the impacts to the 4-H. Therefore, there would be no adverse impacts or disproportionate effects on children from implementing the Proposed Action under the Preferred Alternative.

4.11 TRANSPORTATION

4.11.1 Affected Environment

4.11.1.1 Roadways and Traffic

The three alternative site locations and the surrounding roadway network are depicted in Figures 4-13 and 4-14. The Alternative 1 and 2 sites currently generate minimal traffic including vehicles accessing a single family residence on the Cross Keys Road site and farm equipment accessing the Erial Road site. Cross Keys Road (County Road 689) is a two-lane Urban Principal Arterial with a pavement width of approximately 24 feet with minimal shoulders. The speed limit is not posted for this section of Cross Keys Road. The closest major signalized intersection is located at Erial Road approximately ½ mile west of the site. Cross Keys Road has been widened at this intersection to accommodate turning lanes. Approximately two miles to the east of the site is an at-grade freight rail crossing. At some unspecified time in the future Cross Keys Road is slated to be widened to a four-lane road.

Erial Road (County Road 706) is a two-lane Urban Collector with a pavement width of approximately 27 feet with minimal shoulders. The Alternative 2 site is located just to the south of the Williamstown- New Freedom Road signalized intersection. The posted speed limit for this section of Erial Road is 50 mph.

The Preferred Alternative site is located at the northwest corner of the Woodbury-Turnersville Road (County Road 707) and Salina Road (County Road 748) intersection in the Lakeland area of Gloucester Township, NJ. This three-way intersection is currently unsignalized with a stop sign located on the minor approach (Salina Road). Woodbury Turnersville Road is a two lane Urban Minor Arterial with a

pavement width of 26 feet with no shoulders. The posted speed limit for this section of Woodbury-Turnersville Road is 25 mph. The closest major signalized intersection is located at Black Horse Pike (State Route 168) approximately one mile to the east of the site. Salina Road is a two lane Urban Local road with a pavement width of approximately 24 feet to the south of the Preferred Alternative site. The posted speed limit for this section of Salina Road is 35 mph. Lakeland Road is a two lane Urban Minor Arterial with a pavement width of 35 feet with no shoulders to the north of the Preferred Alternative site. The posted speed limit is 35 mph. The unsignalized Lakeland Road intersection with Woodbury-Turnersville Road is located very close to the northern end of the Preferred Alternative site. This intersection has stop signs and crosswalks located on all four approaches.

A portion of the Preferred Alternative site is currently used as a parking lot with approximately 166 spaces for the Camden County Health Services Center. Since this facility is located to the east, pedestrians must cross Woodbury Turnersville Road for access. Based on data provided by Camden County, approximately 100 spaces out of the 166 spaces are occupied by the Camden County Health Department (75 employee vehicles and 25 government vehicles) on a daily basis (Vesper, 2010). All of the vehicles using this parking lot access the site from Woodbury-Turnersville Road through one of two driveways. One of the driveways is located at the south end of the lot between Woodbury Turnersville Road and Salina Road. The other driveway located at the north end of the lot is within a short distance of the north-westbound approach crosswalk on Woodbury-Turnersville Road at the Lakeland Road intersection. A secondary (unpaved) access point is provided on Salina Road located on the south side of the site.

Currently, there is no traffic data available for Cross Keys Road, Erial Road, Woodbury-Turnersville Road, or Salina Road.

Figure 4-13. Area Transportation Map - Alternatives 1 and 2

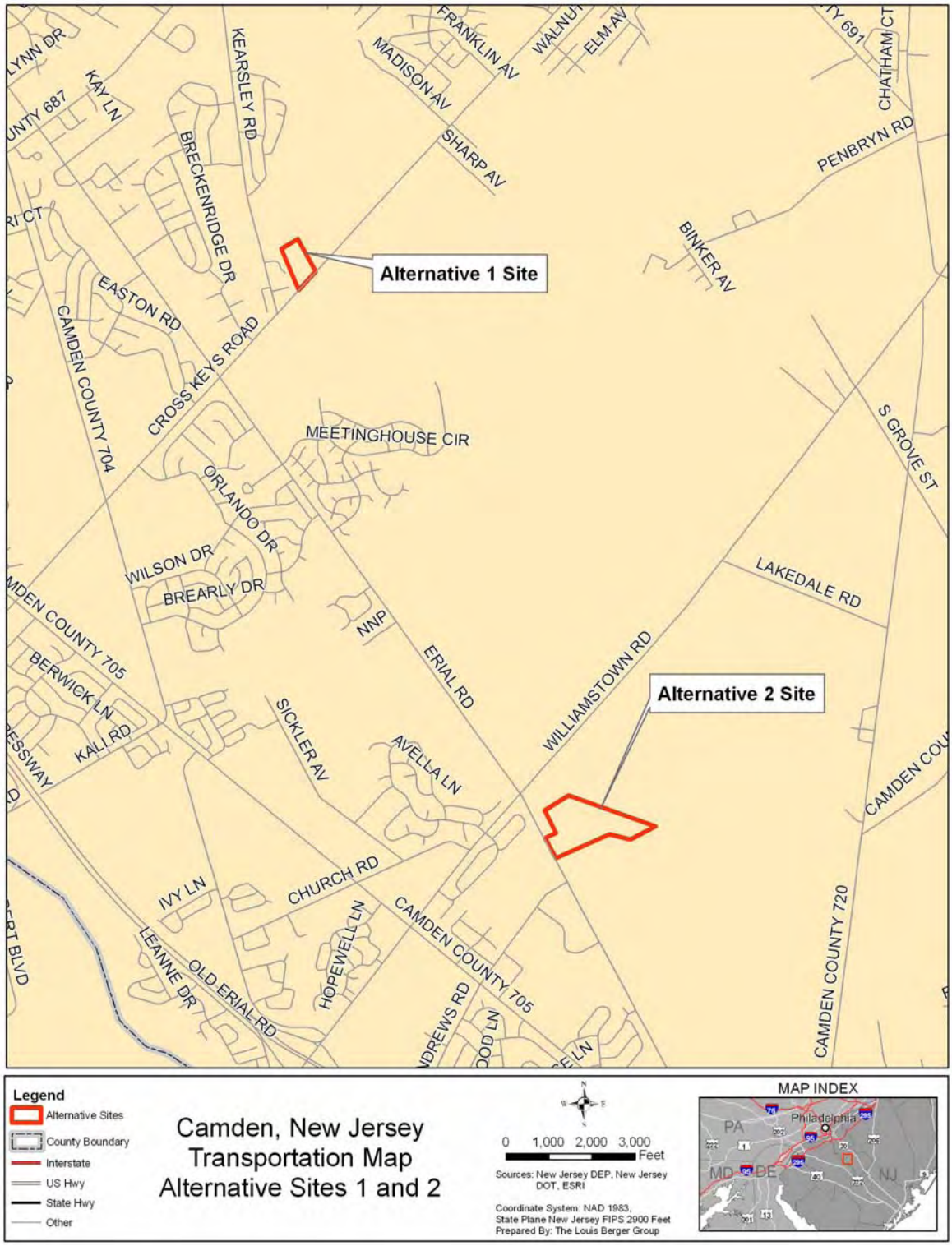
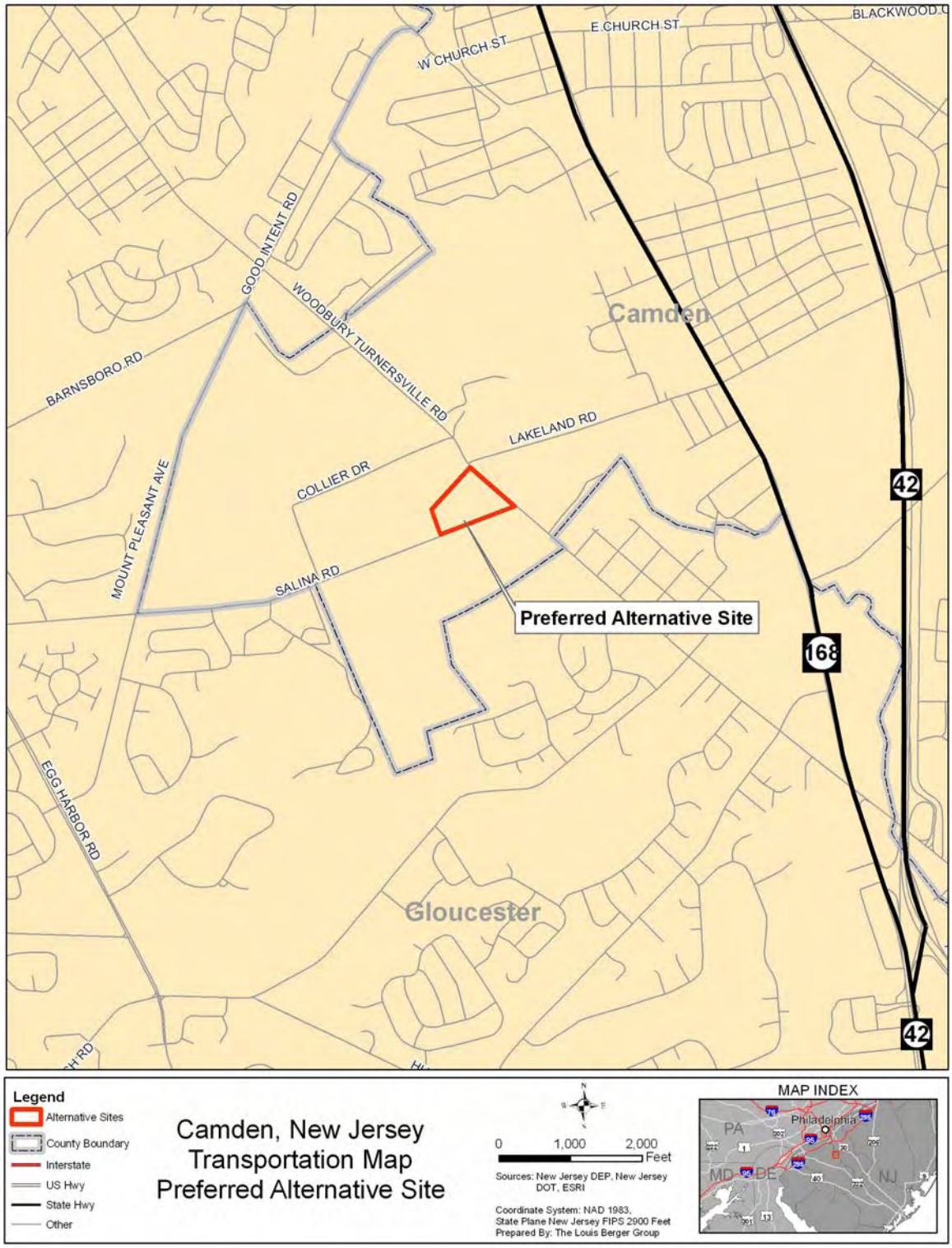


Figure 4-14. Area Transportation Map - Preferred Alternative



4.11.1.2 Public Transportation

Buses. The Cross Keys Road site is served by New Jersey Transit Route 459 which operates between the Voorhees Town Center and the Avandale Park & Ride. However, the closest bus stop (Technical Institute of Camden County) is approximately ½ mile away from the site and the frequency of service is one trip a day in each direction on weekdays and there is no service on Saturday or Sunday. New Jersey Transit Bus Route 400 serves the Erial Road site (along Erial Road) and the Woodbury Turnersville Road site (along Woodbury Turnersville Road) operating hourly between Sicklerville and Philadelphia on weekdays, Saturdays, and Sundays.

Railways. The closest rail station to the three alternative sites is at Lindenwold. This is the eastern terminal station for the Port Authority Transit Corporation (PATCO) Speedline which is a rapid transit line operating into Philadelphia. In addition, this station serves New Jersey Transit's Atlantic City Line providing service between Atlantic City, NJ and Philadelphia, PA. The New Jersey Transit Route 459 stops at the Lindenwold Station. However, because of the limited service frequency provided on this bus route, site connectivity to rail is not practical.

The New Jersey Transit Bus Route 400 stops at the Walter Rand Transportation Center (a transportation hub located approximately 13 miles north of the Preferred Alternative site). Connection at this transit center is available for the PATCO Speedline and the NJ Transit's River LINE which is a light rail system that operates between the Entertainment Center in Camden and the Trenton Transit Center.

4.11.2 Environmental Consequences

The following criteria have been developed to assess the transportation impacts for each of the alternatives:

> ***No Effect*** – No alterations of traffic patterns and trends would result from the action.
>
> ***No Significant Effect*** – Short- or long-term alterations of traffic patterns and trends would result from the action. The intersections may reach capacity but this change would be temporary or managed through improvements.
>
> ***Significant Effect*** – Traffic patterns would be permanently altered from the action. The intersections would reach capacity and extensive delays would develop.

4.11.2.1 No Action Alternative

Implementation of the No Action Alternative would not alter the existing transportation infrastructure at the alternative sites being considered under the Proposed Action or in surrounding areas. Therefore, no effects would be expected.

4.11.2.2 Alternative 1 – Cross Keys Road

It is anticipated that the construction at the Alternative 1 site would be completed by 2012. Under Alternative 1, no significant effects on traffic would be expected during the construction of the proposed facility as long as the same number of travel lanes (one in each direction) is maintained for the duration of the construction. However, a Maintenance and Protection of Traffic (MPT) plan would be required and approved by Camden County and NJ Department of Transportation (DOT). The MPT would need to be prepared to the specifications of the Manual on Uniform Traffic Control Devices (MUTCD). These plans would detail the specific treatments for maintaining and transitioning traffic during the various stages of construction using devices such as barriers, cones, arrow boards, police, flag men, etc. to direct traffic.

Some short-term adverse impacts could occur depending on the measures taken to manage disruptions, such as requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. The construction project would be relatively small and construction related traffic is not expected to be significant.

It is projected that the approximately 17 full-time employees would access the site on weekdays. It is anticipated that most of these employees would arrive to the site during the morning peak period and depart the site during the afternoon peak period. The 347 reservists/part-time soldiers projected to be assigned to this AFRC would only access the site on weekends. Since drilling occurs over the course of three weekends a month, not all units drill on the same weekend. As a result, the maximum number of reservists/part-time soldiers projected to access the site on any weekend would be 184. It is anticipated that all of the reservists/part-time soldiers would travel between the site and their homes/hotel on both Saturday and Sunday when they train since there will be no berthing facilities on the site. As would be the case for the 17 full-time personnel accessing the site during the weekdays, all of the part-time reservists/soldiers would arrive at the new AFRC site during the morning peak period and depart the site during the afternoon peak period on both weekend days.

An estimate of the trips generated by the proposed AFRC was prepared using the procedures established by the Institute of Transportation Engineers (ITE) *Trip Generation*, Seventh Edition. The AFRC use was modeled as an office building (General Office Building - Code 710) because the full-time employees and reservists are projected to arrive in the morning, stay throughout the day, and leave in the evening similar to office workers. Based on a survey of office developments, the trips generated were associated to an independent variable and time period of analysis (AM and PM peak hours on weekdays) through a regression analysis. Because the number of employees (full-time and part-time reservists/soldiers) is projected, this was used as the independent variable for projecting the total number of trips generated by the AFRC during the AM and PM peak hours.

The directional distribution of trips entering and exiting the site were also estimated based upon the General Office Building Code (710) for the weekday AM and PM peak hours. The number of trips was calculated based upon 88 percent entering and 12 percent exiting during the AM peak hour and 17 percent entering and 83 percent exiting during the PM peak hour. These percentages were used to calculate the number of vehicles projected to exit the site during the AM peak hour and enter the site during the PM peak hour. These same percentages were used to calculate both weekday and weekend trips.

Using the trip generation procedure outlined by the ITE, the trips projected by the Proposed Action were estimated (Table 4-14). These trips reflect the net increase in activity as a result of implementing the Proposed Action.

Table 4-14. Additional Trips Generated at the Alternative 1 Site

	AM Peak Hour			PM Peak Hour		
	In	**Out**	**Total**	**In**	**Out**	**Total**
Weekday						
Armed Forces Reserve Center	13	2	15	2	13	15
Weekend						
Armed Forces Reserve Center	107	15	122	23	112	135

Significant delays for traffic entering the site would be very unlikely considering the low volume of site generated vehicles on weekdays and the low mainline volumes on weekends. There may be some sporadic delays for vehicles exiting the site on weekdays depending upon prevailing conditions. This situation would only improve if Cross Keys Road is widened to four lanes in the future. Based upon the resulting volumes under Alternative 1, no significant effects would be expected during operations of the

proposed AFRC. Since access to the POV lot will not be gated, no new queues would be anticipated at the proposed AFRC.

4.11.2.3 Alternative 2 – Erial Road

Impacts to transportation resources under Alternative 2 would be similar to those under Alternative 1 and would not be significant. Significant delays for traffic entering the site would be very unlikely considering the low volume of site generated vehicles on weekdays and the low mainline volumes on weekends. There may be some sporadic delays for vehicles exiting the site on weekdays depending upon prevailing conditions.

4.11.2.4 Preferred Alternative – Lakeland

Under the Preferred Alternative, the 166 space parking lot for the Camden County Health Services Center would be closed. Approximately 100 daily vehicles would be shifted to a yet to be determined site located near the Preferred Alternative site in the vicinity of the Camden County Health Services Center. The AFRC, MEP, and the OMS would be accessible from separate driveways from both Woodbury-Turnersville Road and Salina Road. Traffic entering these driveways would be monitored by access control gates. A third driveway would connect Woodbury-Turnersville Road to the POV lot and would not have an access control gate. The POV lot would be restricted for use by personnel conducting business at the AFRC including the full-time employees working during the week, those working on the weekends, and visitors. Personnel not attending business at the AFRC would not be allowed to park within the POV lot.

Impacts to transportation resources under the Preferred Alternative would also be similar to those under Alternative 1. The projected traffic volumes for the Preferred Alternative site during the week would be significantly less than the current volumes entering and exiting the existing parking lot. The entering and exiting volumes on a weekend day would be comparable to the exiting parking lot during the week. Based upon these volumes, it would be unlikely that significant traffic delays would occur given the low volume of site generated vehicles on weekdays and the lower mainline volumes on weekends.

Since it is not currently known where Camden County Health Department employees would be relocated to under the Preferred Alternative, it is not possible to analyze the potential transportation impacts of the relocation of the new facilities in this EA. However, in relocating/constructing the new parking facilities, the County would follow all state and local environmental regulations to ensure there were no unmitigated significant transportation impacts.

4.12 UTILITIES

4.12.1 Affected Environment

The ROI is defined as utility services on the three alternative sites and any potential effects on public utility service providers in the area of these sites. Local municipal utility entities provide all major utilities (electricity, water, natural gas, sewer) and are accessible to the three sites, except sewer at the Alternative 2 Site. The new AFRC facilities would have to tie into each of the local municipal utility systems. The local municipal utility entities are anticipated to have sufficient capacity to meet current and foreseeable AFRC mission needs, except for sanitary sewer at the Alternative 2 Site.

4.12.1.1 Potable Water Supply

Alternative 1 - Cross Keys Road. Potable water is available from the Aqua New Jersey Water Company to the proposed Cross Keys Road site along the frontage of Cross Keys Road. The new AFRC facilities would be able to tie into the municipal water main at the curb. The municipal water supply available to the proposed site meets federal and state water quality standards (CH2MHill, 2009).

An onsite well also exists on the property near the garage. The well has been used for residential purposes and to water livestock previously located on the property (CH2MHill, 2009). No water quality or well testing data is available for the well.

Fire demand at the proposed site would be provided by the Gloucester Township Fire District.

Alternative 2 - Erial Road. Access to potable water is available to the Erial Road via Winslow Township. The new AFRC facilities would be able to tie into the municipal water supply at the curb along Erial Road (U.S. Army, 2008c).

Fire demand at Erial Road would be provided by the Sicklerville Fire Department (Winslow Township).

Preferred Alternative – Lakeland. Potable water is available to the Lakeland site from the Aqua New Jersey Water Company (Hart, 2010). The new AFRC facilities would be able to tie into existing onsite municipal water lines. Based on a 2008 annual water quality report, the municipal water supply available to the proposed site meets federal and state water quality standards (AQUA, 2008).

Fire demand at the proposed site would be provided by the Gloucester Township Fire District.

4.12.1.2 Sanitary Sewer Service

Alternative 1 - Cross Keys Road. Sanitary sewer services that service the one private residence on the proposed site are currently provided by a septic tank system and associated drain field. Municipal sewer service does not currently exist on the proposed site. Sewer services are available approximately 300 feet from the property line across the Cross Keys Road (U.S. Army, 2008c). Sewer services would be provided by the Camden County Municipal Utility Authority.

Alternative 2 - Erial Road. No sanitary sewer service is available at the Erial Road site. A sanitary sewer moratorium remains in effect for the portion of Winslow Township that includes the Erial Road location. Winslow Township has implemented several steps toward getting the moratorium lifted and anticipates it will be lifted within two years; however, it could potentially take longer (Gallagher, 2010). Coordination with local authorities would be required regarding the status of the moratorium.

Preferred Alternative – Lakeland. Sanitary sewer service is available to the Lakeland site from the Gloucester Township Municipal Utility Authority (Carr, 2010). The new AFRC facilities would be able to tie into existing onsite municipal sewer lines.

4.12.1.3 Electrical Service and Distribution

Alternative 1 - Cross Keys Road. Electrical service to Cross Keys Road is provided by the Atlantic City Electric Company, which would also provide service to the proposed new AFRC facilities (CH2MHill, 2009).

Alternative 2 - Erial Road. No electrical power is currently located on the Erial Road site, however, electrical power is accessible at the curb along Erial Road (U.S. Army, 2008c).

Preferred Alternative – Lakeland. Electrical service to the Lakeland site is provided by Public Service Enterprise Group (PSEG). The AFRC facilities would be able to tie into existing onsite service. Specific electrical information would be available from PSEG once preliminary load information has been developed and provided (Regina, 2010).

4.12.1.4 Stormwater System

Alternative 1 - Cross Keys Road. The topography of the Cross Keys Road site is flat. The site has been recently graded and is unpaved (U.S. Army, 2008c). There is currently no stormwater management controls located on the site. Stormwater naturally infiltrates the soils.

Alternative 2 - Erial Road. The topography of the Erial Road site is flat. The site is a working farmland with a portion of the property forested. The site is unpaved. The site is in close proximity to an unnamed tributary that feeds the Great Egg Harbor River (U.S. Army, 2008c). Similar to the Cross Keys Road site, there is no stormwater management controls on site. Stormwater naturally infiltrates the soils.

Preferred Alternative – Lakeland. The Lakeland site is relatively flat and largely unpaved. The site drains northwesterly to the unnamed tributary of the South Branch of Big Timber Creek which eventually drains to the Delaware River (Camden County, 2010). There are currently no stormwater management controls located on the site. Stormwater naturally infiltrates the soils.

4.12.1.5 Natural Gas

Alternative 1 - Cross Keys Road. Natural gas provides heat for the existing residence on the southeast area of the site. Natural gas is provided to the site by South Jersey Gas Company (CH2MHill, 2009).

Alternative 2 - Erial Road. Natural gas is accessible to the site via existing gas lines along Erial Road. The new AFRC would have to construct an extension line to access the municipal gas line.

Preferred Alternative – Lakeland. Natural gas is accessible to the site via existing gas lines along Woodbury-Turnersville Road and Salina Road (Secora, 2010). Natural gas is provided to the site by South Jersey Gas Company. The AFRC would be able to tie into the exiting gas lines after obtaining appropriate permits.

4.12.1.6 Communications

Alternative 1 - Cross Keys Road. Communications systems, such as telephone and cable are available via local providers in the vicinity of the site along Cross Keys Road.

Alternative 2 - Erial Road. Communications systems, such as telephone and cable are available via local providers in the vicinity of the site along Erial Road.

Preferred Alternative – Lakeland. Communications systems, such as telephone, fiber optics, and cable are available to the site via Verizon or other local providers.

4.12.1.7 Solid Waste

Alternative 1 - Cross Keys Road. No solid waste is currently generated at the site other than waste associated with the existing residence.

Alternative 2 - Erial Road. No solid waste is currently generated at the site other than waste associated with the farming activities.

Preferred Alternative – Lakeland. Currently solid waste is collected in dumpsters on the site. Waste is picked up by Waste Management Inc. and transported to a trash to steam plant in Camden County where it is burned (Mauriello, 2010).

4.12.2 Environmental Consequences

To assess whether impacts to utilities were potentially significant, the following impact thresholds were used to define significance for each utility:

No effect – The proposed action does not impact the human or natural environment

Not Significant Effect – An impact to the human and/or natural environment would occur, but it is less than thresholds indicated below for "significant effect."

Significant Effect – thresholds for significance are defined below:

General Utility Construction – Impacts from construction of utilities would be considered potentially significant if expected to cause human health and safety issues considerably above industry norms or Army acceptable standards and there were no ways to mitigate the disruptions.

Potable Water Supply – Impacts would be considered potentially significant if the proposed action or alternatives would require more potable water than could be reliably provided by the combination of available potable water sources, leading to shortages, or if regulatory limitations on withdrawals or the treatment plant would potentially be exceeded. Major systemic distribution constraints could also be potentially significant; however, the fact that major investments would be required to provide potable water reliably would not necessarily constitute a significant impact if the investments were reasonable for the overall magnitude of proposed construction, or to provide needed restoration or modernization, and would prevent shortages or harm to the environment.

Wastewater System – Impacts would be considered potentially significant if the proposed action or alternatives would require more wastewater treatment capacity than could be reliably provided by the municipal wastewater treatment system, potentially leading to the discharge of effluents in excess of standards, or if regulatory limitations on the wastewater effluent would potentially be exceeded. Major shortfalls in collection capacity could also be potentially significant; however,

the fact that major investments would be required to collect wastewater reliably would not necessarily constitute a significant impact if the investments were reasonable for the overall magnitude of proposed construction, or to provide needed restoration or modernization, and would prevent overflows or harm to the environment.

Stormwater System – Impacts would be considered potentially significant if the proposed action or alternatives would not comply with State or Federal laws governing stormwater discharges.

Energy Sources – Impacts would be considered potentially significant if the proposed action or alternatives would require energy in quantities that would exceed local and/or regional capacities for supply, leading to potentially unreliable service or shortfalls of power or other energy that could affect the AFRC's mission. Major systemic distribution constraints could also be potentially significant; however, the fact that major investments would be required to provide energy reliably would not necessarily constitute a significant impact if the investments were reasonable for the overall magnitude of proposed construction, or to provide needed restoration or modernization, and would prevent shortages that could affect the AFRC's mission.

Communications – Impacts would be considered potentially significant if the proposed action or alternatives would require communication systems to meet mission requirements that could not be provided without major modifications to the existing communications systems.

Municipal Solid Waste – Impacts would be considered potentially significant if the proposed action or alternatives would require collection and/or disposal that could not be provided in a reliable manner, which could cause waste to accumulate or be disposed of in a manner that could adversely affect human health or the environment.

4.12.2.1 No Action Alternative

Under the No Action Alternative, the proposed property would not be acquired and current conditions would prevail without change. No effects on utilities would occur.

4.12.2.2 Alternative 1 – Cross Keys Road

The overall impacts on utilities as a result of implementing the Proposed Action under Alternative 1 would have no significant effects. Under Alternative 1 all utilities would be provided by local municipal entities. The AFRC would construct lines to tie into the municipal lines that are located in close proximity to the proposed site. The exact utility loads have not been determined at this phase of the

project. This information will be determined in the design phase of the project. The site is located along a major thoroughfare and according to the ASIV report; all utilities are available at the curb. The local municipal utility entities are expected to be able to meet the utilities demand of the proposed facilities. This will be verified during the design process. The local municipal utility entities are expected to be able to meet the demand of the facilities. In addition, it is anticipated that the design of the proposed facilities would meet the Leadership in Energy and Environmental Design (LEED™) Silver rating, reducing the overall utility demands of the facilities.

Potable Water Supply – No significant effects would result from implementing the Proposed Action under Alternative 1. The demand on the municipal company's potable water system is not expected to exceed the capacity of the system; however, this will be verified during the design phase. The exact load required for the new facilities will be determined during the design process. There are existing potable water supply lines at the curb that can be accessed to provide potable water to the proposed facilities. In order to meet the LEED™ Silver rating, it is likely that the new facilities would be outfitted with Energy Star rated water-efficient control devices which would decrease the amount of water usage.

Sanitary Sewer System – No significant effects would result from Proposed Action under Alternative 1. The new facilities would tie into sewer system lines in the vicinity of the site. At this time, the Camden County Municipal Utility Authority has sufficient capacity to meet current and future demands of the proposed facility (Costello, 2009).

Electric Service and Distribution – No significant effects would be expected from Proposed Action under Alternative 1. The Atlantic Electric Company has sufficient capacity to meet the demands of the proposed facility (Calabria, 2009). No new transmission supply lines would be needed for they currently exist at the site. The likely installation of Energy Star rated energy-efficient interior and exterior lighting fixtures would decrease the overall demand.

Stormwater System – No significant effects would be expected from Proposed Action under Alternative 1. The Proposed Action would create approximately 3.7 acres of impervious surface, increasing the amount of stormwater runoff produced on-site. Specific stormwater management measures for the Proposed Action have not yet been designed. However, all stormwater generated on-site from the facilities would be treated for both quality and quantity on-site and any stormwater discharged off-site would meet all state and local regulatory and permit requirements. The employment of stormwater management BMPs during and after construction of new facilities, such as those suggested in the New Jersey Stormwater Best Management Practices Manual (NJDEP, 2004) would help to minimize any

potential impacts from stormwater runoff and would help to meet any regulatory and permit requirements. A stormwater management plan and a NJ Pollutant Discharge Elimination System (NJPDES) permit may be required and the project would comply with EISA 438 regulations.

Natural Gas – No significant effects would result from implementing the Proposed Action under Alternative 1. The proposed facility would tie into local municipal natural gas supply lines. A distribution system would be constructed that has the capacity to accommodate current and future usage. The capacity needed for the new facilities is not known at this time and will be calculated during the design phase of the facilities. The ability of the existing infrastructure to meet this demand will also be verified during the design phase of the project.

Communications – No significant effects would be expected to communications from implementing the Proposed Action under Alternative 1. Communication lines exist in the vicinity of the site and are anticipated to have the capacity to accommodate current and future usage. The capacity needed for the new facilities is not known at this time and will be calculated during the design phase of the facilities. The ability of the existing infrastructure to meet this demand will also be verified during the design phase of the project.

Solid Waste – No significant effects would be expected from implementing the Proposed Action under Alternative 1, though short-term minor adverse effects would occur. Debris from the demolition of the residence and associated structures on the site and construction of the new facilities would temporarily increase the amount of solid waste generated by the Proposed Action. It is anticipated that sufficient capacity exists in the regional landfill to accommodate the relatively small amount of construction and demolition (C&D)-related debris generated by the Proposed Action. The exact requirement would be determined during the design phase of the project. To reduce the amount of C&D debris to be disposed of at the regional landfill, C&D debris would be recycled to the greatest extent feasible. All C&D debris that is not able to be recycled would be disposed of in accordance with applicable federal and state laws at a permitted disposal facility. Solid waste generated during the operation of the AFRC would be disposed of through the services of private contractors who would collect and transport waste to transfer stations in the Camden, New Jersey area. The waste would be properly disposed of at a licensed landfill or other waste disposal sites.

4.12.2.3 Alternative 2 – Erial Road

Potable Water Supply – Impacts under this alternative would be expected to be similar to Alternative 1.

Sanitary Sewer System – The Winslow Township sanitary sewer moratorium may not be lifted when the Army implements construction of the new AFRC facility. If the sanitary sewer moratorium is lifted by the time construction occurs, the new AFRC facility would tie into the infrastructure for the Winslow Township sanitary sewer system. If the sanitary sewer moratorium is not lifted by the time construction occurs, the AFRC facility sewer lines would still be constructed for tie in, but would not be connected to the township sanitary sewer infrastructure. The Army would continue to coordinate with the township and tie into the system when the moratorium has been lifted. In the interim, in order to occupy the facilities by January 2012, an onsite sanitary sewer treatment facility would be constructed that would be in compliance with all applicable state and local regulations. All requirements would be determined during the design phase of the project. Therefore, no significant impacts would be expected from implementing Alternative 2.

Electric Service and Distribution – Impacts under this alternative would be expected to be similar to Alternative 1.

Stormwater System – Impacts under this alternative would be expected to be similar to Alternative 1.

Natural Gas – Impacts under this alternative would be expected to be similar to Alternative 1.

Communications – Impacts under this alternative would be expected to be similar to Alternative 1.

Solid Waste – No significant effects would be expected from implementing the Proposed Action under this alternative. There are no existing structures on the site that require demolition so no demolition debris would be generated. There would be solid waste debris from construction activities. Similar to Alternative 1, solid waste generated by the proposed AFRC would be disposed of through the services of private contractors who would collect and transport waste to transfer stations in the Camden, New Jersey area. The waste would be properly disposed of at a licensed landfill or other waste disposal sites.

4.12.2.4 Preferred Alternative – Lakeland

Potable Water Supply – Impacts under this alternative would be expected to be similar to Alternative 1.

Sanitary Sewer System – Impacts under this alternative would be expected to be similar to Alternative 1.

Electric Service and Distribution – Impacts under this alternative would be expected to be similar to Alternative 1.

Stormwater System – Impacts under this alternative would be expected to be similar to Alternative 1.

Natural Gas –Communications – Impacts under this alternative would be expected to be similar to Alternative 1.

Solid Waste –Impacts under this alternative would be expected to be similar to Alternative 1. However, under the Preferred Alternative as compared to Alternative 1, slightly more solid waste would be generated during the demolition of three buildings and one parking lot. However, this increase would be temporary and not create a significant impact.

4.13 HAZARDOUS AND TOXIC SUBSTANCES

Hazardous materials are substances that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may present a substantial danger to public health or the environment if released. These typically include reactive materials such as explosives, ignitables, toxics (such as pesticides), and corrosives (such as battery acid). When improperly stored, transported, or otherwise managed, hazardous materials can significantly affect human health and safety and the environment.

4.13.1 Affected Environment

4.13.1.1 Hazardous Materials Use

Alternative 1 – Cross Keys Road

The site is a currently vacant area formerly used for agricultural purposes and hazardous materials are not used on the site.

Alternative 2 – Erial Road

The site is currently used for agricultural purposes and the following amount of herbicides and/or fungicides are reported as being used on the farm annually: Trifluralin (1 cup/acre); Oxidate (2 quarts/acre); Dachtal (5 quarts/acre); Ridomil Gold (1 cup/acre) (Andrew, 2008).

Preferred Alternative – Lakeland

The Lakeland site is largely grassy and contains a wooded area on its northwestern section, a parking lot, and three 4-H buildings. There is no known hazardous material usage on the site.

4.13.1.2 Hazardous Waste Storage and Handling Areas

There are no hazardous waste storage or handling areas at any of the sites.

4.13.1.3 Site Contamination Cleanup

Alternative 1 – Cross Keys Road

A Phase I Environmental Site Assessment conducted for the site concluded that no evidence was found that the site had been used for any activities that would be of any major environmental impact (Underwood Engineering, 2007). The 2009 Environmental Conditions Report (ECP) stated that although minor amounts of general refuse such as bottles and litter were found within the site, there was no evidence found of recognized environmental conditions involving the presence or likely presence of a hazardous substance or petroleum (CH2MHill, 2009). The ECP also states that it is unknown whether a transformer on an overhead power pole adjacent to the site contains Polychlorinated biphenyls (PCB).

There is a building located at the southeast area of the site that was constructed circa 1900. This building would be demolished. Due to the age of the building the potential exists that it contains lead-based paint (LBP). Sampling conducted in December 2008 confirmed that the siding of the building and associated garage contains asbestos containing material (ACM). Sampling results also indicate that no asbestos was detected in 25 soil samples collected from areas around formerly demolished buildings on the property (CH2MHill, 2009).

Alternative 2 – Erial Road

As discussed, the site is currently used for agricultural purposes and the herbicides and/or fungicides listed in Section 13.1.1 are reported as being used on the farm annually. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) controls the distribution, sale, and use of pesticides. FIFRA requires all pesticide manufacturers to register their pesticides with the U.S. EPA before they are allowed to be marketed.

Preferred Alternative – Lakeland

A 250-gallon above ground storage tank for heating oil associated with one of the 4-H buildings is present on the site. During a site assessment, no stains or leaks associated with the tank or its piping were observed, and there are no other known contaminated sites or remediation areas located on the Preferred Alternative site (Camden County, 2010). The site contains three 4-H buildings, two of which were constructed in the 1930s. The construction date of the third building is unknown. Based on the age of the buildings, they could potentially contain ACM. In addition, painted surfaces such as window frames, doors, and eaves could potential contain LBP.

4.13.2 Environmental Consequences

For the purposes of assessing the significance of impacts related to hazardous and toxic substances, the following impact thresholds were developed:

> ***No Effect*** – There would be no increase in the amount of hazardous materials or waste handled, stored, used, or disposed of.
>
> ***No Significant Effect –*** Action would result in an increase in the amount of materials or waste to be handled, stored, used, or disposed; but all hazardous or toxic materials and/or wastes could be safely and adequately managed in accordance with all applicable regulations and policies, with limited exposures or risks.
>
> ***Significant Effect*** – Action would result in a substantial increase (more than 100%) in the amount of materials or waste to be handled, stored, used, or disposed of, and this could not be safely or adequately handled or managed by the proposed staffing, resulting in unacceptable risk, exceedance of available waste disposal capacity, or probable regulatory violation. Site contamination conditions would preclude development of the site for the proposed use.

4.13.2.1 No Action Alternative

No effects would be expected for under the No Action Alternative, as the proposed new facilities would not be constructed at either of the two sites.

4.13.2.2 Alternative 1 – Cross Keys Road

Implementing the Proposed Action under Alternative 1 would result in no significant adverse effects in relation to hazardous or toxic substances.

The proposed AFRC building would consist primarily of office space, administrative service, weapons simulator, and physical fitness areas. There would be minimal use of hazardous materials, such as janitorial products and printing supplies. Any hazardous materials will be handled and stored in accordance with applicable regulations and label precautions and will not have any significant adverse impacts. Some negligible long-term adverse effects would be expected from the very minimal increase in use of hazardous materials and waste generated by the proposed facilities.

The proposed OMS facility would include vehicle service bays for routine vehicle maintenance (e.g. oil changes etc.) and a controlled waste storage area. Routine vehicle maintenance activities require the use of several types of hazardous materials including degreasers, solvents, and batteries which would be

stored and used in limited quantities. All hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through the Defense Reuse and Marketing Organization (DRMO). The existing OMS at Nelson Brittin Army Reserve Center is a conditionally exempt small quantity generator and it is assumed that it would continue to be conditionally exempt under the Proposed Action.

Due to the age of the building at the southeast area of the property, the potential for environmental impacts of special hazards such as ACM and LBP would be evaluated by U.S. EPA certified inspectors and addressed as specified in the appropriate regulatory requirements before initiating any demolition activities. In the event relocation is required for the pole containing the transformer; it would be evaluated for PCB and would be addressed as specified in the appropriate regulatory requirements before initiating any disturbance.

4.13.2.3 Alternative 2 – Erial Road

The impacts of the facilities operations would be the same as Alternative 1. Therefore, implementing the Proposed Action would result in no significant adverse effects in relation to hazardous or toxic substances.

The site is currently used for agricultural purposes and the herbicides and/or fungicides listed in Section 13.1.1 are reported as being used on the farm annually. However, the use of the herbicides and/or fungicides is regulated under FIFRA and the affected area would be evaluated and addressed as specified in the appropriate regulatory requirements before initiating any construction activities.

4.13.2.4 Preferred Alternative – Lakeland

The impacts of the facilities operations would be the same as Alternative 1; therefore, implementing the Proposed Action under the Preferred Alternative would result in no significant adverse effects in relation to hazardous or toxic substances. Due to the age of the 4-H buildings located on the site, the potential for environmental impacts of special hazards such as ACM and LBP would be evaluated by U.S. EPA certified inspectors and addressed as specified in the appropriate regulatory requirements before initiating any demolition activities and result in no significant impacts. Removal of the 250-gallon above ground storage tank associated with one of the 4-H buildings would be in compliance with all federal, state, and local laws and regulations governing its disposition.

4.14 CUMULATIVE EFFECTS SUMMARY

A cumulative impact is defined as "the impacts on the environment that result from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertake such other actions" (40 CFR 1508.7). The section goes on to note: "such impacts can result from individually minor but collectively significant actions taking place over a period of time." Cumulative impacts associated with implementation of the Proposed Action would include any impacts from other on-going actions that would be incremental to the impacts of constructing the proposed AFRC complex and realigning units in Camden, NJ.

Other past, present or future projects that are considered for their cumulative impacts include the widening of Cross Keys Road in the vicinity of the Alternative 1 site from 2 lanes to 4 lanes, the widening of the bridge at Cross Keys Road over the Atlantic City Expressway from 4 lanes to six lanes, and reconfiguration of the intersection of Williamstown Road and Erial Road (Lechner, 2008 and McGlinchey, 2008).

Camden County plans to widen Cross Keys Road from two to four lanes within the County east to White Horse Pike (U.S. 30) (Morris, 2008). Although this project is not currently federally funded as part of Delaware Valley Regional Planning Commission's (DVRPC) FY 2009 – 2012 Transportation Improvement Program (TIP), it was identified by DVRPC in its Long Range Plan, *Destination 2030* (DVRPC, 2005). The South Jersey Transportation Authority (SJTA) operates the Atlantic City Expressway. They have identified a bottleneck to the west of the proposed project and will widen the bridge at Cross Keys Road over the Atlantic City Expressway from four lanes to six lanes. Funding for this project has been identified by SJTA as part of their TIP. Camden County plans to improve the intersection of Williamstown Road and Erial Road located just northwest of the Alternative 2 site. Since there have been some fatal accidents at this intersection in the recent past, a study is being conducted to identify potential signal improvements and the reconfiguration of the intersection to improve safety.

In 2009 the Camden County Improvement Authority developed a Master Plan for the Camden County Health and Executive Campus Facilities, commonly known as the Lakeland Complex where the Preferred Alternative site is located (Camden County Improvement Authority, 2009). In it, there are a number of recommendations for improvements to parking, traffic patterns, utility infrastructure, and land use for the 562 acre complex, approximately 428 acres of which is developed or potentially developable land. However, at this time, there are no known actions being taken in the reasonably foreseeable future to be able to analyze as a cumulative action project.

4.14.1 No Action Alternative

Implementation of the No Action Alternative would avoid new impacts that could interact with the impacts of other past, present, or reasonably foreseeable actions. Therefore, there would be no cumulative impacts associated with the No Action Alternative.

4.14.2 Alternative 1 – Cross Keys Road

Implementation of the other projects under consideration would not likely cause any significant cumulative effects.

According to Camden County, for the widening of the section of Cross Keys Road adjacent to the Alternative 1 site, the right-of-way has been acquired but the project must get the appropriate permits before it can be constructed. It is likely that the AFRC will be constructed prior to the widening since it will be approximately three to four years before the permitting has been completed. This project along with the widening of the Cross Keys Road Bridge over the Atlantic City Expressway would help to improve traffic flow and access to and from the Alternative 1 site. The timeframe for construction of the bridge is not known, but the widening of Cross Keys Road in the vicinity of the site would occur after the completion of the AFRC; therefore, there would likely be no adverse cumulative impacts from construction activities. However, if construction projects do overlap between all of these projects there would be some minor cumulative adverse impacts realized through traffic delays and emissions from construction vehicles.

4.14.3 Alternative 2 – Erial Road

Cumulative impacts under this alternative would be similar to those for Alternative 1 and would not be significant. The widening of Cross Keys Road as well as the bridge over the Atlantic City Expressway as well as the reconfiguration of the intersection of Erial Road and Williamstown Road would help improve traffic flow and access to and from this proposed AFRC. Due to the timeframe for completion of the studies required for reconfiguring the intersection it is likely that construction activities would not coincide with construction of the AFRC. However, if construction projects do overlap between all of these projects there would be some minor cumulative adverse impacts realized through traffic delays and emissions from construction vehicles.

4.14.4 Preferred Alternative – Lakeland

Currently, there are no projects to analyze for cumulative impacts with the Preferred Alternative, so there would be no effects from cumulative impacts under the Preferred Alternative. The widening of Cross

Keys Road, as well as the bridge over the Atlantic City Expressway and the reconfiguration of the intersection of Erial Road and Williamstown Road would not be a cumulative impact for the Preferred Alternative site as they are not in proximity to the site and would not impact transportation routes that would be used by personnel to access the site. In addition, there are no known projects recommended in the Master Plan for the Lakeland Complex that are far enough along in the planning stages to be able to analyze potential impacts.

4.15 MITIGATION SUMMARY

None of the predicted effects of the Proposed Action would result in significant impacts under the Alternative 1 or Alternative 2 site locations; therefore, mitigation is not needed for implementing the Proposed Action at either of these two sites. However, the Army may consider the use of BMPs in the construction and operation of the AFRC and associated facilities, including specific measure to reduce potential erosion, stormwater runoff, and sediment transport during site preparation and construction activities.

For the Preferred Alternative site, implementing the Proposed Action would result in potential significant impacts to surface waters and soils if soil testing conducted by the Army confirms the presumed presence of acid producing soils. To prevent or minimize the problem of water pollution and soil contamination that may otherwise be caused by exposure of acid producing soils to the atmosphere, the NJDEP stipulates a number of mitigations measures in their draft Technical Manual for Flood Hazard Area Control Act Rules N.J.A.C. 7:13 (Section 7.5 General Mitigation Standards, Section 7.6 Mitigation Procedures Along Channels, and Section 7.7 Disposal of Acid Producing Soil Deposits) that must be implemented when disturbing and/or disposing of acid producing soils (NJDEP, 2008e). If soil testing confirms the presence of acid producing soils on the Preferred Alternative site, the Army would commit to implementing the appropriate mitigation measures and work with the NJDEP to obtain the necessary permits for disturbing soils and vegetation within the 150-foot riparian zone (the buffer size is a result of the presence of acid producing soils) associated with the unnamed tributary of the South Branch of Big Timber Creek (NJDEP, 2007d and 2008e).

5.0 FINDING AND CONCLUSIONS

5.1 FINDINGS

5.1.1 Consequences of the No Action Alternative

Under the No Action Alternative, the proposed new AFRC and the associated facilities would not be constructed, and no environmental impacts would occur.

5.1.2 Consequences of the Proposed Action

The Proposed Action would not have any significant adverse effects on any of the environmental or related resource areas within the local or surrounding areas of the alternative sites. All of the resource areas other than *Surface Water* and *Soils* on the Preferred Alternative site were evaluated to be at the No Effects or No Significant Effect levels. With the implementation of appropriate mitigation measures as stipulated by the NJDEP in the draft Technical Manual for Flood Hazard Area Control Act Rules N.J.A.C. 7:13 for the disturbance and disposal of acid producing soils, the impacts on surface waters and soils under the Preferred Alternative site were evaluated at the No Significant Effect level.

A summary of impacts by resource area for the No Action and the two action alternatives is provided in Table 5-1.

Table 5-1. Summary of the Impacts of the Proposed Action Alternatives

Resource	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Land Use				
Regional Geographic Setting and Location	No effect.	No effect.	No effect.	No effect.
Site Land Use	No effect.	No significant effect.	No significant effect.	No significant effect.
Current and Future Development in the Region of Influence	No effect.	No significant effect.	No significant effect.	No significant effect.
Aesthetic and Visual Resources	No effect.	No significant effect.	No significant effect.	No significant effect.
Air Quality				
Ambient Air Quality Conditions	No effect.	No significant effect.	No significant effect.	No significant effect.
Meteorology/Climate	No effect.	No effect.	No effect.	No effect.

Resource	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Air Pollutant Emissions at Project Site	No effect.	No significant effect.	No significant effect.	No significant effect.
Regional Air Pollutant Emissions Summary	No effect.	No significant effect.	No significant effect.	No significant effect.
Noise	No effect.	No significant effect.	No significant effect.	No significant effect.
Geology and Soils				
Geologic and Topographic Conditions	No effect.	No significant effect.	No significant effect.	No significant effect.
Soils	No effect.	No significant effect.	No significant effect.	No significant effect with implementation of acid producing soil mitigation measures.
Prime Farmland	No effect.	No effect.	No effect.	No effect.
Water Resources				
Surface Water	No effect.	No significant effect.	No significant effect.	No significant effect with implementation of acid producing soil mitigation measures.
Wetlands	No effect.	No effect.	No significant effect.	No significant effect.
Hydrogeology/Groundwater	No effect.	No significant effect.	No significant effect.	No significant effect.
Floodplains	No effect.	No effect.	No effect.	No effect.
Coastal Zone	No effect.	No effect.	No effect.	No effect.
Biological Resources				
Vegetation	No effect.	No significant effect.	No significant effect.	No significant effect.
Wildlife	No effect.	No significant effect.	No significant effect.	No significant effect.
Threatened, Endangered, and Sensitive Species	No effect.	No significant effect.	No significant effect.	No effect.
Cultural Resources				
Archaeology	No effect.	No effect.	No effect.	No effect.
Built Environment	No effect.	No effect.	No effect.	No effect.
Native American Resources	No effect.	No effect.	No effect.	No effect.

Resource	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Socioeconomics				
Economic Development	No effect.	No significant effect.	No significant effect.	No significant effect.
Demographics	No effect.	No significant effect.	No significant effect.	No significant effect.
Environmental Justice	No effect.	No effect.	No effect.	No effect.
Protection of Children	No effect.	No effect.	No effect.	No effect.
Transportation				
Roadways and Traffic	No effect.	No significant effect.	No significant effect.	No significant effect.
Public Transportation	No effect.	No effect.	No effect.	No effect.
Utilities				
Potable Water Supply	No effect.	No significant effect.	No significant effect.	No significant effect.
Sanitary Sewer System	No effect.	No significant effect.	No significant effect.	No significant effect.
Electrical Service and Distribution	No effect.	No significant effect.	No significant effect.	No significant effect.
Stormwater System	No effect.	No significant effect.	No significant effect.	No significant effect.
Natural gas	No effect.	No significant effect.	No significant effect.	No significant effect.
Communications	No effect.	No significant effect.	No significant effect.	No significant effect.
Municipal Solid Waste	No effect.	No significant effect.	No significant effect.	No significant effect.
Hazardous and Toxic Substances				
Uses of Hazardous Materials	No effect.	No significant effect.	No significant effect.	No significant effect.
Storage and Handling Areas	No effect.	No significant effect.	No significant effect.	No significant effect.
Site Contamination and Cleanup	No effect.	No significant effect.	No significant effect.	No significant effect.
Cumulative Effects	No effect.	No significant effect	No significant effect.	No effect.

5.2 CONCLUSIONS

Based on the analysis performed in this EA, implementation of the Proposed Action at the Alternative 1 Site and the Alternative 2, or at the Preferred Alternative site with implementation of appropriate acid producing soil mitigation measures would have no significant direct, indirect, or cumulative effects on the quality of the natural or human environment. Preparation of an EIS is not required. Issuance of a FNSI would be appropriate.

The following permits, plans and or mitigation measures would likely be required in implementing the Proposed Action identified in this analysis:

- A Stormwater Management Plan and a New Jersey Pollutant Discharge Elimination System (NJPDES) permit would likely be required.
- A Maintenance and Protection of Traffic (MPT) plan would be required and approved by Camden County and NJ DOT. The MPT would need to be prepared to the specifications of the Manual on Uniform Traffic Control Devices (MUTCD).
- For the Alternative 2 site, a New Jersey Freshwater Wetlands Permit may be required if the location of the approximately 10 acres to be purchased requires construction activities to occur within the buffer/transition area associated with any wetlands.
- For the Preferred Alternative site, a New Jersey Freshwater Wetlands Permit may be required if construction activities encroach upon the wetland buffer/transition area in the northwest portion of the property.
- For the Preferred Alternative, the Army would need to obtain a permit from the NJDEP under the Flood Hazard Area Control Act to construct in the riparian buffer (buffer size is 150-feet if soil testing conducted by the Army confirms the presumed presence of acid producing soils or 50-feet if no acid producing soils are present) and would need to implement mitigation measures as stipulated in the draft Technical Manual Flood Hazard Area Control Act Rules N.J.A.C. 7:13 (Section 7.5 General Mitigation Standards, Section 7.6 Mitigation Procedures Along Channels, and Section 7.7 Disposal of Acid Producing Soil Deposits) if it is confirmed that acid producing soils are present.

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9.0 **REFERENCES**

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10.0 ACRONYMS

°	Degrees
ACM	Asbestos Containing Materials
AEPI	U.S. Army Environmental Policy Institute
AFRC	Armed Forces Reserve Center
AIRFA	American Indian Religious Freedom Act
AQI	Air Quality Index
ARNG	Army National Guard
ARPA	Archaeological Resources Protection Act
ASIV	Available Site Identification and Validation
AT/FP	Anti-Terrorism/Force Protection
BMP	Best Management Practice(s)
BRAC	Base Realignment and Closure
C&D	Construction and Demolition
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act (also known as SuperFund)
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO^2	Carbon Dioxide
COBRA	Cost of Base Realignment Actions
CWA	Clean Water Act
CZMA	Coastal Zone Management Act

dB	Decibels
dBA	A-weighted Decibels
DD	Defense Department (forms only)
DoD	Department of Defense
DOT	Department of Transportation
DRMO	Defense Reuse and Marketing Organization
DVRPC	Delaware Valley Regional Planning Commission
EA	Environmental Assessment
ECP	Environmental Conditions Report
EIFS	Economic Impact Forecast System
EIS	Environmental Impact Statement
EISA	Energy Independence Security Act
EO	Executive Order
ESA	Endangered Species Act
F	Fahrenheit
FEMA	Federal Emergency Management Agency
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FIRM	Flood Insurance Rate Maps
FNSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FT	Feet
FWPCA	Federal Water Pollution Control Act
GHG	Greenhouse Gas
gpm	Gallons Per Minute

HR	Hour
HVAC	Heating, Ventilation, and Air Conditioning
ITE	Institute of Transportation Engineers
lb	pound
LBP	Lead Based Paint
LEED	Leadership in Energy and Environmental Design
LOI	Letter of Interpretation
m^3	cubic meters
MEP	Military Equipment Parking
mg/l	milligrams per liter
MSA	Metropolitan Statistical Area
MPT	Maintenance and Protection of Traffic
MUTCD	Manual of Uniform Traffic Control Devices
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAMS	National Air Monitoring Stations
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NJ	New Jersey
NJARNG	New Jersey Army National Guard
NJDEP	New Jersey Department of Environmental Protection
NJPC	New Jersey Pinelands Commission
NJPDES	New Jersey Pollution Discharge Elimination System

NJSHPO	New Jersey State Historic Preservation Officer
NOI	Notice of Intent
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NPV	Net Present Value
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
O_3	Ozone
OMS	Organizational Maintenance Shop
ONRW	Outstanding National Resource Waters
OSHA	Occupational Safety and Health Administration
OTR	Ozone Transport Region
OWS	Oil Water Separateor
PA	Pennsylvania
PATCO	Port Authority Transit Corporation
Pb	Lead
PCB	polychlorinated biphenyls
PCPI	Per Capita Personal Income
PL	Public Law
PM_{10}	particles with a diameter less than or equal to a nominal 10 micrometers
$PM_{2.5}$	particles with a diameter less than or equal to a nominal 2.5 micrometers
POL	petroleum, oils, and lubricants
POV	Privately-Owned Vehicle
ppm	parts per million
PSE&G	Public Service Electric & Gas

RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
ROI	Region of Influence
RONA	Record of Non-Applicability
RSC	Regional Support Command
RTV	Rational Threshold Value
SDWA	Safe Drinking Water Act
SF	square feet
SIP	State Implementation Plan
SJTA	South Jersey Transportation Authority
SLAMS	State and Local Air Monitoring Stations
SO_2	sulfur dioxide
SSR	Site Survey Report
TIP	Transportation Improvement Program
TSCA	Toxic Substance Control Act
TPY	tons per year
ug	micrograms
USACE	U.S. Army Corps of Engineers
USARC	U.S. Army Reserve Center
USC	United States Code
USCS	Unified Soil Classification System
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey
U.S. EPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

VOC	Volatile Organic Compounds

APPENDIX A— SECRETARY OF DEFENSE JUSTIFICATION FOR BRAC ACTIONS AT CAMDEN, NJ

Reserve Component Transformation in New Jersey

Secretary of Defense Recommendation

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.

Secretary of Defense Justification

This recommendation transforms Reserve Component facilities in the State of New Jersey. The implementation of this recommendation will enhance military value, improve homeland defense capability, greatly improve training and deployment capability, create significant efficiencies and cost savings, and is consistent with the Army's force structure plans and Army transformational objectives.

This recommendation is the result of a state-wide analysis of Reserve Component installations and facilities conducted by a team of functional experts from Headquarters, Department of the Army, the Office of the State Adjutant General, and the Army Reserve Regional Readiness Command.

This recommendation closes Brittin Army Reserve Center in Camden, NJ, and constructs a multicomponent, multifunctional Armed Forces Reserve Center (AFRC) in Camden, NJ. This recommendation reduces costs for maintaining existing facilities by collapsing two separate facilities into one modern AFRC. The Department understands that the State of New Jersey will close one National Guard Armory in Burlington, NJ. The Armed Forces Reserve Centers will have the capability to accommodate these units if the state decides to relocate units to the new multifunctional AFRC in Camden, NJ.

This recommendation considered feasible locations within the demographic and geographic areas of the closing facilities and affected units. The sites selected were determined as the best locations because they optimize the Reserve Components' ability to recruit and retain Reserve Component soldiers and to train and mobilize units affected by this recommendation. This recommendation provides the

opportunity for other Local, State, or Federal organizations to partner with the Reserve Components to enhance homeland security and homeland defense at a reduced cost to those agencies.

Although not captured in the COBRA analysis, this recommendation avoids an estimated $14.5M in mission facility renovation costs and procurement avoidances associated with meeting AT/FP construction standards and altering existing facilities to meet unit training and communications requirements. Consideration of these avoided costs would reduce costs and increase the net savings to the Department of Defense in the 6-year BRAC implementation period and in the 20-year period used to calculate NPV.

Community Concerns

There were no formal expressions from the community.

Commission Findings

The Commission found no reason to disagree with the recommendation of the Secretary of Defense. In addition, the Commission notes that the Army's process was well thought-out and inclusive of the leadership of the Reserve Components and the State.

Commission Recommendations

The Commission found the Secretary's recommendation consistent with the final selection criteria and force structure plan. Therefore, the Commission approved the recommendation of the Secretary.

APPENDIX B— FEDERAL AND STATE COORDINATION LETTERS

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

REPLY TO
ATTENTION OF

April 10, 2009

Clifford G. Day, Supervisor
U.S. Fish and Wildlife Service
New Jersey Field Office
927 North Main Street
Heritage Square, Building D
Pleasantville, New Jersey 08232

Dear Mr. Day:

The Department of the Army (DA) is preparing an Environmental Assessment (EA) for the proposed construction of a new Armed Forces Reserve Center (AFRC) and associated support facilities in Camden County, NJ. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. 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. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The EA will analyze and document potential environmental effects associated with the Army's proposed realignment actions. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Environmental Analysis of Army Actions (32 CFR Part 651); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The proposed AFRC would provide an approximately 53,291 square feet (SF), 300-member training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for six U.S. Army Reserve units and one NJARNG unit. Associated support facilities include an approximately 6,933 SF Organizational Maintenance Shop (OMS), and an approximately 1,217 SF unheated storage building. In addition, there would be approximately 2.25 acres of paved areas including 1.20 acres of military equipment parking (MEP) areas and 1.05 acres of privately-owned vehicle (POV) parking areas and access roads.

The Army is evaluating two alternative sites for implementing the Proposed Action, both of which are located outside of the Pinelands National Reserve. The preferred alternative is to

construct the facilities on approximately 11 acres of land located at 389 Cross Keys Road, Gloucester Township, Camden County, NJ (see Enclosure 1). This site has recently been cleared of trees and graded by the current land owner (see Enclosure 2). There is one small private residence on the eastern portion of the property that is occupied by the former owner of the property. He has an understanding with the current owner that he will relocate once the property is sold. This house would be demolished as part of the Army's construction project.

A second alternative would construct the facilities on a parcel of land located at 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ (see Enclosures 3). While the entire parcel of land consists of approximately 34 acres, the current land owner is willing to subdivide the land and the Army would only purchase approximately 10 acres for the proposed facilities. Neither the easement for the overhead transmission line located on the eastern portion of the property, nor any of the wetlands associated with the unnamed tributary to the Great Egg Harbor River along the northern and eastern portion of the property would be included in the land purchased by the Army (see Enclosure 4).

The Army is initiating this consultation in accordance with NEPA and the Endangered Species Act to evaluate the potential impacts (both beneficial and adverse) of implementing the Proposed Action. Construction activities will be conducted in accordance with local practices and standards, and based on information available we do not anticipate that the project will impact any federally listed species, migratory birds, or wetlands. Please confirm that no federally endangered, threatened or candidate species occur in the proposed project areas and that no additional or formal consultation under Section 7 of the Endangered Species Act is necessary.

Your office will be provided with a copy of the EA when it is released for public review; however, we would appreciate any initial input you may have on the Proposed Action and the sites being considered. Thank you in advance for your cooperation in this matter. If there are any questions or if there is a need for additional information, please contact: Ms. Robyn Mock, U. S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil. Please provide any comments within 30 calendar days from day of receipt of this letter.

Sincerely,

FOR: Deputy

Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Preferred Alternative Location for BRAC Proposed Action Topographic Map
Enclosure 2: Preferred Alternative Location for BRAC Proposed Action
Enclosure 3: Alternative 2 Location for BRAC Proposed Action Topographic Map
Enclosure 4: Alternative 2 Location for BRAC Proposed Action - Aerial Photo

From: Byron, Rebecca
Sent: Tuesday, May 19, 2009 2:55 PM
To: Wendy_Walsh@FWS.GOV
Cc: Smith, Spence
Subject: Camden County Consultation
Attachments: USFWS.pdf

Wendy –

Thank you so much for looking for the consultation letter we had sent 10 April. I looked on the NJ consultation website and both Gloucester and Winslow Counties contain several listed species. In our records, however, none of the species is present on either site.

I have attached a copy of the letter sent. Would you be able to provide an estimate for a response? This EA is about to go into public review, and the Army would prefer to have your comments incorporated into the document if at all possible.

Thanks again,

Rudi

Rudi Byron
Environmental Scientist

tel 202.303.2638
fax 202.293.0787

The Louis Berger Group, Inc. | 2445 M Street NW | Washington, DC 20037 | www.louisberger.com

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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

2009-IE-0571

JUL 21 2009

Laura Dell'Olio
Environmental/NEPA Specialist,
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, New Jersey 08640

Subject: Notice of Availability – Environmental Assessment for the Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Actions in Camden, New Jersey

Dear Ms. Dell'Olio:

The U.S. Fish and Wildlife Service (Service) has reviewed the above-referenced proposed project pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) (ESA) to ensure the protection of federally listed endangered and threatened species. The Department of the Army (applicant) proposes to construct a new facility and realign its functions in Camden County, New Jersey.

The project identified two reasonable alternatives to meet the project's purpose. The scope of these comments pertains to potential impacts to federally listed species pursuant to the ESA. The Environmental Assessment utilizes a GIS database to determine impacts of the project on wetlands and watercourses; however the Service recommends that each of these alternatives be visually inspected to determine potential impacts, if any, to the aquatic environment. In addition, the Service recommends that all upland clearing be minimized to the maximum extant practicable, that a tree clearing restriction be established from April 1 through August 15 to protect potential nesting migratory birds, and that all landscaping proposed for the project utilize native species of New Jersey.

No federally listed or proposed threatened or endangered flora or fauna under Service jurisdiction are known to occur within the proposed project's impact area. Therefore, no further consultation pursuant the ESA is required. If additional information on federally listed species becomes available, or if project plans change, this determination may be reconsidered.

Please refer to this office's web site at http://www.fws.gov/northeast/njfieldoffice/Endangered/ for further information including federally listed and candidate species lists, procedures for requesting ESA review, the National Bald Eagle Management Guidelines, and contacts for

obtaining information from the New Jersey Natural Heritage and Endangered and Nongame Species Programs regarding State-listed and other species of concern.

Should you have any questions regarding these comments, please contact Mr. Steven Mars of my staff at (609) 646-9310 extension 23.

Sincerely,

Acting Supervisor

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

REPLY TO
ATTENTION OF

March 9, 2010

Clifford G. Day, Supervisor
U.S. Fish and Wildlife Service
New Jersey Field Office
927 North Main Street
Heritage Square, Building D
Pleasantville, New Jersey 08232

Dear Mr. Day:

The United States Army Reserve (USAR), Regional Support Command (RSC) is proposing land acquisition, construction, and operation of a U.S. Armed Forces Reserve Center (AFRC) in Camden County, New Jersey (NJ), in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The Department of the Army is preparing an Environmental Assessment (EA) that will analyze and document potential environmental effects associated with the Army's proposed realignment actions. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); and, Environmental Analysis of Army Actions (32 CFR Part 651).

The proposed AFRC would provide an approximately 53,291 square feet (SF), 300-member training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for six U.S. Army Reserve units and one NJARNG unit. Associated support facilities include an approximately 6,933 SF Organizational Maintenance Shop (OMS), and an approximately 1,217 SF unheated storage building. In addition, there would be approximately 2.25 acres of paved areas including 1.20 acres of military equipment parking (MEP) areas and 1.05 acres of privately-owned vehicle (POV) parking areas and access roads.

By correspondence dated April 10, 2009 (Enclosure 1) your office was previously consulted regarding the Proposed Action for two alternative sites; 389 Cross Keys Road in Gloucester Township, Camden County, NJ, and 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ. By return correspondence dated July 21, 2009 (2009-IE-0571) your office determined that there are no federally listed or proposed threatened or endangered species within the original proposed project areas.

In response to public comments and concerns, the Army is now considering a third alternative site in addition to the Cross Keys Road and Erial Road sites. The third site is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ (Camden County) (Enclosure 2). This site is County-owned property and is located outside of the Pinelands National Preserve. The site consists of approximately 14 acres and is also known as the 4-H County Fairgrounds. The property includes three structures (two barns and a snack bar) and a parking lot for Camden County Health Department employees that would all need to be demolished. Camden County will be responsible for relocating these facilities. There are wetlands associated with the adjacent South Branch of the Big Timber Creek along the western portion of the parcel (Enclosure 3). These wetlands were delineated by the County in 2008. Subsequently, the NJ Department of Environmental Protection issued a Letter of Interpretation (LOI) indicating they had a Wetland Resource Value Classification (RVC) of Intermediate with a 50 foot standard wetland buffer. Should this site be chosen, the Army would avoid any construction activities within the wetlands and their associated 50 foot buffer.

Please confirm that no federally endangered, threatened or candidate species occur on the third alternative site located in the Lakeland area of Gloucester Township, NJ and that no additional or formal consultation under Section 7 of the Endangered Species Act is necessary. To sufficiently address key project issues while maintaining the project schedule, we request that you provide a written response to this letter within 30 days of receipt. If you require additional information or have questions or concerns pertaining to this correspondence, please contact: Ms. Robyn Mock, U.S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil.

Sincerely,

FOR:

Jose E. Cepeda
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Previous Correspondence
Enclosure 2: Alternative 3 Location for BRAC Proposed Action – USGS Topographic Map
Enclosure 3: Alternative 3 Location for BRAC Proposed Action – Aerial Photo

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

REPLY TO
ATTENTION OF

April 10, 2009

Herb Lord
The New Jersey Natural Heritage Program
Office of Natural Lands Management
Division of Parks and Forestry
Department of Environmental Protection
P.O. Box 404
Trenton, New Jersey 08625

Dear Mr. Lord:

The Department of the Army (DA) is preparing an Environmental Assessment (EA) for the proposed construction of a new Armed Forces Reserve Center (AFRC) and associated support facilities in Camden County, NJ. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. 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. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The EA will analyze and document potential environmental effects associated with the Army's proposed realignment actions. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Environmental Analysis of Army Actions (32 CFR Part 651); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The proposed AFRC would provide an approximately 53,291 square feet (SF), 300-member training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for six U.S. Army Reserve units and one NJARNG unit. Associated support facilities include an approximately 6,933 SF Organizational Maintenance Shop (OMS), and an approximately 1,217 SF unheated storage building. In addition, there would be approximately 2.25 acres of paved areas including 1.20 acres of military equipment parking (MEP) areas and 1.05 acres of privately-owned vehicle (POV) parking areas and access roads.

The Army is evaluating two alternative sites for implementing the Proposed Action, both of which are located outside of the Pinelands National Reserve. The preferred alternative is to

construct the facilities on approximately 11 acres of land located at 389 Cross Keys Road, Gloucester Township, Camden County, NJ (see Enclosure 1). This site has recently been cleared of trees and graded by the current land owner (see Enclosure 2). There is one small private residence on the eastern portion of the property that is occupied by the former owner of the property. He has an understanding with the current owner that he will relocate once the property is sold. This house would be demolished as part of the Army's construction project.

A second alternative would construct the facilities on a parcel of land located at 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ (see Enclosure 3). While the entire parcel of land consists of approximately 34 acres, the current land owner is willing to subdivide the land and the Army would only purchase approximately 10 acres for the proposed facilities. Neither the easement for the overhead transmission line located on the eastern portion of the property, nor any of the wetlands associated with the unnamed tributary to the Great Egg Harbor River along the northern and eastern portion of the property would be included in the land purchased by the Army (see Enclosure 4).

The Army is initiating this consultation in accordance with NEPA and the Endangered Species Act to evaluate the potential impacts (both beneficial and adverse) of implementing the Proposed Action. Construction activities will be conducted in accordance with local practices and standards, and based on information available we do not anticipate that the project will impact any state listed species, migratory birds, or wetlands. We seek confirmation from the NJ Department of Environmental Protection Natural Heritage Program that this BRAC-related action will not adversely impact any of the trust resources of the State of New Jersey. A completed Natural Heritage Data Request Form is attached.

Your office will be provided with a copy of the EA when it is released for public review; however, we would appreciate any initial input you may have on the Proposed Action and the sites being considered. Thank you in advance for your cooperation in this matter. If there are any questions or if there is a need for additional information, please contact: Ms. Robyn Mock, U. S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil. Please provide any comments within 30-calander days from day of receipt of this letter.

Sincerely,

For: Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Preferred Alternative Location for BRAC Proposed Action Topographic Map
Enclosure 2: Preferred Alternative Location for BRAC Proposed Action
Enclosure 3: Alternative 2 Location for BRAC Proposed Action Topographic Map
Enclosure 4: Alternative 2 Location for BRAC Proposed Action - Aerial Photo
Enclosure 5: NJ Natural Heritage Form

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

Division of Parks and Forestry
Office of Natural Lands Management
Natural Heritage Program
P.O. Box 404
Trenton, NJ 08625-0404
Tel. #609-984-1339
Fax. #609-984-1427

MARK N. MAURIELLO
Acting Commissioner

April 23, 2009

Joseph H. Ledlow
Colonel, US Army Reserve
Department of the Army
99th Regional Support Command
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

Re: Construction of an Armed Forces Reserve Center - Gloucester Twp. (Block 17902, Lot 13)

Dear Col. Ledlow:

Thank you for your data request regarding rare species information for the above referenced project site in Gloucester Township, Camden County.

Searches of the Natural Heritage Database and the Landscape Project (Version 3 for the highlands region, Version 2.1 elsewhere) are based on a representation of the boundaries of your project site in our Geographic Information System (GIS). We make every effort to accurately transfer your project bounds from the topographic map(s) submitted with the Request for Data into our Geographic Information System. We do not typically verify that your project bounds are accurate, or check them against other sources.

We have checked the Natural Heritage Database and the Landscape Project habitat mapping for occurrences of any rare wildlife species or wildlife habitat on the referenced site. Please see Table 1 for species list and conservation status.

Table 1 (on referenced site).

Common Name	Scientific Name	Federal Status	State Status	Grank	Srank
Cooper's hawk	*Accipiter cooperii*		T/S	G5	S2B,S4N
eastern box turtle	*Terrapene carolina carolina*		SC	G5T5	S3
eastern king snake	*Lampropeltis g. getula*		U	G5T5	S3
great blue heron	*Ardea herodias*		SC/S	G5	S3B,S4N

Neither the Natural Heritage Database nor the Landscape Project has records for any additional rare wildlife species or wildlife habitat within 1/4 mile of the referenced site.

We have also checked the Natural Heritage Database for occurrences of rare plant species or ecological communities. The Natural Heritage Database does not have any records for rare plants or ecological communities on or within 1/4 mile of the site.

A list of rare plant species and ecological communities that have been documented from Camden County can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/countylist.html. If suitable habitat is present at the project site, the species in that list have potential to be present.

Status and rank codes used in the tables and lists are defined in EXPLANATION OF CODES USED IN NATURAL HERITAGE REPORTS, which can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/nhpcodes_2008.pdf.

If you have questions concerning the wildlife records or wildlife species mentioned in this response, we recommend that you visit the interactive I-Map-NJ website at the following URL, http://www.state.nj.us/dep/gis/depsplash.htm or contact the Division of Fish and Wildlife, Endangered and Nongame Species Program at (609) 292 9400.

PLEASE SEE 'CAUTIONS AND RESTRICTIONS ON NHP DATA', which can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/newcaution2008.pdf.

Thank you for consulting the Natural Heritage Program. The attached invoice details the payment due for processing this data request. Feel free to contact us again regarding any future data requests.

Sincerely,

Patricia Szilver for

Herbert A. Lord
Data Request Specialist

cc: Robert J. Cartica
NHP File No. 09-3907478-2167

State of New Jersey

JON S. CORZINE
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Division of Parks and Forestry
Office of Natural Lands Management
Natural Heritage Program
P.O. Box 404
Trenton, NJ 08625-0404
Tel. #609-984-1339
Fax. #609-984-1427

MARK N. MAURIELLO
Acting Commissioner

April 23, 2009

Joseph H. Ledlow
Colonel, US Army Reserve
Department of the Army
99th Regional Support Command
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

Re: Construction of an Armed Forces Reserve Center - Winslow Twp. (Block 2904, Lot 4)

Dear Col. Ledlow:

Thank you for your data request regarding rare species information for the above referenced project site in Winslow Township, Camden County.

Searches of the Natural Heritage Database and the Landscape Project (Version 3 for the highlands region, Version 2.1 elsewhere) are based on a representation of the boundaries of your project site in our Geographic Information System (GIS). We make every effort to accurately transfer your project bounds from the topographic map(s) submitted with the Request for Data into our Geographic Information System. We do not typically verify that your project bounds are accurate, or check them against other sources.

We have checked the Natural Heritage Database and the Landscape Project habitat mapping for occurrences of any rare wildlife species or wildlife habitat on the referenced site. Please see Table 1 for species list and conservation status.

Table 1 (on referenced site).

Common Name	Scientific Name	Federal Status	State Status	Grank	Srank
eastern box turtle	*Terrapene carolina carolina*		SC	G5T5	S3
great blue heron	*Ardea herodias*		SC/S	G5	S3B,S4N

We have also checked the Natural Heritage Database and the Landscape Project habitat mapping for occurrences of any rare wildlife species or wildlife habitat within 1/4 mile of the referenced site. Please see Table 2 for species list and conservation status. This table excludes any species listed in Table 1.

Table 2 (additional species within 1/4 mile of referenced site).

Common Name	*Scientific Name*	Federal Status	State Status	Grank	Srank
eastern king snake	*Lampropeltis g. getula*		U	G5T5	S3
Fowler's toad	*Bufo woodhousii fowleri*		SC	G5	S3
wood thrush	*Hylocichla mustelina*		SC/S	G5	S3B

We have also checked the Natural Heritage Database for occurrences of rare plant species or ecological communities. The Natural Heritage Database does not have any records for rare plants or ecological communities on or within 1/4 mile of the site.

A list of rare plant species and ecological communities that have been documented from Camden County can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/countylist.html. If suitable habitat is present at the project site, the species in that list have potential to be present.

Status and rank codes used in the tables and lists are defined in EXPLANATION OF CODES USED IN NATURAL HERITAGE REPORTS, which can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/nhpcodes_2008.pdf.

If you have questions concerning the wildlife records or wildlife species mentioned in this response, we recommend that you visit the interactive I-Map-NJ website at the following URL, http://www.state.nj.us/dep/gis/depsplash.htm or contact the Division of Fish and Wildlife, Endangered and Nongame Species Program at (609) 292 9400.

PLEASE SEE 'CAUTIONS AND RESTRICTIONS ON NHP DATA', which can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/newcaution2008.pdf.

Thank you for consulting the Natural Heritage Program. The attached invoice details the payment due for processing this data request. Feel free to contact us again regarding any future data requests.

Sincerely,

Herbert A. Lord

Herbert A. Lord
Data Request Specialist

cc: Robert J. Cartica
NHP File No. 09-3907468-2194 (by Patricia Sziber)

CONVERSATION RECORD

Date 20 May 2009 Time 4:00

Name: Gretchen Fowles

Organization: NJDEP – Natural Heritage Program

Phone: 908-638-4127

RE: T&E species

Ms Fowles informed me that the determination for presence of T&E were based on Landscape Mapping uses which were based on 2002 Landuse/Landcover data. I notified her that the Preferred Alternative site has been cleared since 2007 and is devoid of trees, therefore not too probably that there would be nesting habitat for Cooper's Hawk. She agreed that habitat on the Preferred Alternative site was probably unlikely and that the most recent data does not represent current situation. As for applicable permits on either the preferred alternative or alternative 2 sites, she directed me to call the DEP's Land Use Regulatory Program because she does not know if permits will be required even though the Preferred site is clear and we will be avoiding wetlands on Alternative 2 site.

Written by J. Yuan

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

REPLY TO
ATTENTION OF

March 9, 2010

Herb Lord
The New Jersey Natural Heritage Program
Office of Natural Lands Management
Division of Parks and Forestry
Department of Environmental Protection
P.O. Box 404
Trenton, New Jersey 08625

Dear Mr. Lord:

The United States Army Reserve, Regional Support Command is proposing land acquisition and construction and operation of a U.S. Armed Forces Reserve Center (AFRC) in Camden County, New Jersey (NJ), in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. 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. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The Department of the Armhy is preparing an Environmental Assessment in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); and Environmental Analysis of Army Actions (32 CFR Part 651).

The proposed AFRC would provide an approximately 53,291 square feet (SF), 300-member training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for six U.S. Army Reserve units and one NJARNG unit. Associated support facilities include an approximately 6,933 SF Organizational Maintenance Shop (OMS), and an approximately 1,217 SF unheated storage building. In addition, there would be approximately 2.25 acres of paved areas including 1.20 acres of military equipment parking (MEP) areas and 1.05 acres of privately-owned vehicle (POV) parking areas and access roads.

By correspondence dated April 10, 2009 (Enclosure 1) your office was previously consulted regarding the Proposed Action for two alternative sites; 389 Cross Keys Road in Gloucester Township, Camden County, NJ, and 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ. By return correspondences dated July 23, 2009 your office determined that there could potentially be rare wildlife species within the original proposed project areas. Impacts to

these species were considered during the evaluation of the sites.

In response to public comments and concerns, the Army is now considering a third alternative site in addition to the Cross Keys Road and Erial Road sites. The third site is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ (Camden County) (Enclosure 2). This site is County-owned property and is located outside of the Pinelands National Preserve. The site consists of approximately 14 acres and is also known as the 4-H County Fairgrounds. The property includes three structures (two barns and a snack bar) and a parking lot for Camden County Health Department employees that would all need to be demolished. Camden County will be responsible for relocating these facilities. There are wetlands associated with the adjacent South Branch of the Big Timber Creek along the western portion of the parcel (Enclosure 3). These wetlands were delineated by the County in 2008. Subsequently, the NJ Department of Environmental Protection issued a Letter of Interpretation (LOI) indicating they had a Wetland Resource Value Classification (RVC) of Intermediate with a 50 foot standard wetland buffer. Should this site be chosen, the Army would avoid any construction activities within the wetlands and their associated 50 foot buffer.

The Army is initiating this consultation in accordance with NEPA and the Endangered Species Act to evaluate the potential impacts (both beneficial and adverse) of implementing the Proposed Action. Based on information available we do not anticipate that the project will impact any state listed species, migratory birds, or wetlands. We seek confirmation from the NJ Department of Environmental Protection Natural Heritage Program that this BRAC-related action will not adversely impact any of the trust resources of the State of New Jersey on the third alternative site located in Lakeland area of Gloucester Township, NJ. A completed Natural Heritage Data Request Form is attached (Enclosure 4). To sufficiently address key project issues while maintaining the project schedule, we request that you provide a written response to this letter within 30 days of receipt.

If you require additional information or have questions or concerns pertaining to this correspondence, please contact: Ms. Robyn Mock, U.S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil.

Sincerely,

FOR:

Jose E. Cepeda
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Previous Correspondence
Enclosure 2: Alternative 3 Location for BRAC Proposed Action – USGS Topographic Map
Enclosure 3: Alternative 3 Location for BRAC Proposed Action – Aerial Photo
Enclosure 4: NJ Natural Heritage Form

State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Division of Parks and Forestry
Office of Natural Lands Management
Natural Heritage Program
P.O. Box 404
Trenton, NJ 08625-0404
Tel. #609-984-1339
Fax. #609-984-1427

BOB MARTIN
Acting Commissioner

March 17, 2010

Joseph H. Ledlow
Department of the Army
99 Regional Support Command
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

Re: Construction of an Armed Forces Reserve Center (Block 12302, Portion of Lot 1)

Dear Colonel Ledlow:

Thank you for your data request regarding rare species information for the above referenced project site in Gloucester Township, Camden County.

Searches of the Natural Heritage Database and the Landscape Project (Version 3 for the highlands region, Version 2.1 elsewhere) are based on a representation of the boundaries of your project site in our Geographic Information System (GIS). We make every effort to accurately transfer your project bounds from the topographic map(s) submitted with the Request for Data into our Geographic Information System. We do not typically verify that your project bounds are accurate, or check them against other sources.

Neither the Natural Heritage Database nor the Landscape Project has records for any rare wildlife species on the referenced site.

We have also checked the Natural Heritage Database and the Landscape Project habitat mapping for occurrences of any rare wildlife species or wildlife habitat within 1/4 mile of the referenced site. Please see the table below for species list and conservation status.

Species within 1/4 mile of referenced site.

Common Name	*Scientific Name*	Federal Status	State Status	Grank	Srank
great blue heron	*Ardea herodias*		SC/S	G5	S3B,S4N

We have also checked the Natural Heritage Database for occurrences of rare plant species or ecological communities. The Natural Heritage Database does not have any records for rare plants or ecological communities on or within 1/4 mile of the site.

A list of rare plant species and ecological communities that have been documented from Camden County can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/countylist.html. If suitable habitat is present at the project site, the species in that list have potential to be present.

Status and rank codes used in the tables and lists are defined in EXPLANATION OF CODES USED IN NATURAL HERITAGE REPORTS, which can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/nhpcodes_2008.pdf.

If you have questions concerning the wildlife records or wildlife species mentioned in this response, we recommend that you visit the interactive I-Map-NJ website at the following URL, http://www.state.nj.us/dep/gis/depsplash.htm or contact the Division of Fish and Wildlife, Endangered and Nongame Species Program at (609) 292 9400.

PLEASE SEE 'CAUTIONS AND RESTRICTIONS ON NHP DATA', which can be downloaded from http://www.state.nj.us/dep/parksandforests/natural/heritage/newcaution2008.pdf.

Thank you for consulting the Natural Heritage Program. The attached invoice details the payment due for processing this data request. Feel free to contact us again regarding any future data requests.

Sincerely,

Herbert A. Lord

Herbert A. Lord
Data Request Specialist

cc: Robert J. Cartica
NHP File No. 10-3907571-4542

(by Patricia Sziber)

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

REPLY TO
ATTENTION OF

April 10, 2009

Katherine J. Marcopul
Historic Preservation Office
PO Box 404
501 East State Street, 3rd Floor
Trenton, NJ 08625-0404

Dear Ms. Marcopul:

The Department of the Army (DA) is preparing an Environmental Assessment (EA) for the proposed construction of a new Armed Forces Reserve Center (AFRC) and associated support facilities in Camden County, NJ. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The EA will analyze and document potential environmental effects associated with the Army's proposed realignment actions. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Environmental Analysis of Army Actions (32 CFR Part 651); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The Army is evaluating two alternatives for implementing the proposed action. The preferred alternative is to construct the new AFRC on approximately 11 acres of land to be purchased at 389 Cross Keys Road in Gloucester Township Camden County, NJ (see Enclosure 1 & 3). The second alternative is to construct the facilities on approximately 10 acres of land to be purchased from a larger 34 acre parcel at 320 Erial Road in Sicklerville (Winslow Township, Camden County), NJ (see Enclosures 2 & 3). Both alternative sites are located outside of the Pinelands National Reserve.

In accordance with NEPA and Section 106 of the National Historic Preservation Act (NHPA) an evaluation of the potential impacts associated with implementing this action is required. To support the evaluation, the Army contracted with The Louis Berger Group Inc. (Berger) to conduct a Phase I/II cultural resource investigation at each alternative site being considered under the proposed action. The surveys were conducted in October and November, 2008. The final Phase I/II Cultural Resource Investigation report is included as an enclosure to this

correspondence (see Enclosure 4) with the key findings summarized below.

A survey was conducted of historic architecture throughout the architectural Area of Potential Effect (APE) for each site which consisted of tax parcels with an immediate view of the alternative sites. Four historic architectural resources were identified within the architectural APE; one at the Preferred Alternative site and three at the Alternative 2 site. Of these four properties, two were previously identified in a 1982 survey of cultural resources within the Great Egg Harbor and Tuckahoe River watersheds. Survey forms were not completed at that time and there is no N.J. Historic Preservation Office (NJHPO) opinion on file. The four identified architectural resources have been researched, photographed, and documented, and NJHPO Historic Resource Forms have been completed for each (see Enclosure 4). The significance and integrity of each property was also evaluated using National Register eligibility criteria (36 CFR 60). As a result of this survey, the two previously identified and the two newly identified properties are recommended by Berger as ineligible for listing on the National/State Registers due to either a lack of historical association, architectural significance, and/or a loss of architectural and/or historic integrity. As such, the Army does not anticipate that the proposed action would have any visual or physical effects on any historic architectural properties eligible for or listed on the New Jersey and National Register of Historic Places (NRHP).

The archaeological APEs for the Preferred Alternative and the Alternative 2 sites were defined as the entire 11 acre and 34 acre parcels respectively. Based on the results of an archaeological sensitivity assessment, Berger characterized approximately 8-acres of the Preferred Alternative site and approximately 16-acres of the Alternative 2 site as being sensitive for containing previously undocumented historic and/or prehistoric archaeological resources. Within both properties Berger excavated a total of 541 shovel test pits (STP) and two excavation units.

The excavations within the Preferred Alternative site recovered a total of 49 historic and 3 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter, or with the recent demolition of animal pens associated with a former pig farm that was operated on the property. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Two of the prehistoric artifacts, however, were found in close proximity to each other and included two chert flakes. These artifacts have been registered with the New Jersey State Museum as the Hoffman Farm Prehistoric Site (28-Ca-122) (see Enclosure 3 for location). The third prehistoric artifact was identified as an isolated piece of quartz block shatter.

The excavations within the Alternative 2 site recovered a total of 1,058 historic and 4 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter or modern episodes of ground disturbance, including the late 1950s demolition of a former barn, and more recent episodes of landscape modification associated with the expansion of the agricultural fields. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Three of the prehistoric artifacts; however, were found in close proximity to each other and included a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. These artifacts have been registered with the New Jersey State Museum as the Andrews Prehistoric Site (28-Ca-121) (see Enclosure 3 for location). The fourth prehistoric artifact was identified as an isolated hammerstone.

Based on the results of the Phase I/II archaeological investigations, Berger has identified two prehistoric archaeological sites – 28-Ca-121, and 28-Ca-122. Both sites were evaluated with regard to their eligibility for listing on the National Register of Historic Places. For the Hoffman Prehistoric site (28-Ca-122) on the Preferred Alternative site additional excavations recovered only two artifacts, both chert flakes. No evidence of any cultural features or buried ground surfaces was encountered during excavation. Given the limited cultural material recovered from 28-Ca-122, the lack of diagnostic artifacts, and the lack of prehistoric features or buried ground surfaces, The Hoffman Prehistoric Site (28-Ca-122) did not yield, and is unlikely to yield information important in prehistory or history (Criterion D of 36 CFR 60.4, Criteria for Evaluation) and therefore is recommended as not eligible for listing on the NRHP. No further archaeological investigations are recommended for the Preferred Alternative site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Hoffman Prehistoric Site (28-Ca-122).

The Andrews Prehistoric Site (28-Ca-121) is located within the Alternative 2 site and consisted of a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. The artifacts have yielded new data with regard to the prehistory of the surrounding area – i.e., a diagnostic projectile point suggesting Middle Archaic period activity within the property. Therefore, the Andrews Prehistoric Site (28-Ca-121) is recommended eligible for listing on the NRHP under Criterion D (36 CFR 60.4, Criteria for Evaluation). Extensive subsurface testing within the limits of the Andrews Prehistoric Site (28-Ca-121) recovered only the three prehistoric artifacts and no features or buried ground surfaces. Due to the paucity of archaeological material recovered from 28-Ca-121, it is unlikely that further subsurface excavations would yield additional information. No further archaeological investigations are recommended for the proposed undertaking within the Alternative 2 site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Andrews Prehistoric Site (28-Ca-121).

We welcome your input and request your concurrence with the determinations made. Your office will also be provided with a copy of the EA when it is released for public review. Thank you in advance for your cooperation in this matter. If there are any questions or if there is a need for additional information, please contact: : Ms. Robyn Mock, U. S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil. Please provide any comments within 30-calander days from day of receipt of this letter.

Sincerely,

For: Deputy

Joseph H. Ledlow
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Preferred Alternative Location for BRAC Proposed Action Topographic Map
Enclosure 2: Alternative 2 Location for BRAC Proposed Action Topographic Map
Enclosure 3: Prehistoric Site Locations on the Preferred Alternative and Alternative 2 Sites
Enclosure 4: Phase 1&2 Cultural Resource Investigation

CONVERSATION RECORD

Date 19 May 2009 Time 3:00

Name: John Kinney

Organization: NJ Historic Preservation Office

Phone: 609-984-0141

RE: Consultation Letter

Mr Kinney stated that the letter was received on 20 April and was currently being reviewed. Comments will be sent ASAP.

Written by Rudi Byron

HPO- H2009-145 PROD
Log # 09-1000-2,-3 VM

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NATURAL & HISTORIC RESOURCES, HISTORIC PRESERVATION OFFICE
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JON S. CORZINE
Governor

MARK N. MAURIELLO
Acting Commissioner

August 20, 2009

Colonel Joseph H. Ledlow
Department of the Army
Headquarters, 99TH Regional Support Command
5231 South Scott Plaza
Fort Dix, New Jersey 08640-5000

Dear Colonel Ledlow:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published with amendments in the Federal Register on 6 July 2004 (69 FR 40544-40555), I am providing **Consultation Comments** for the following proposed undertaking:

Camden County, Gloucester and Winslow Townships
Environmental Assessment (EA)
Construction of a new Armed Forces Reserve Center (AFRC)
389 Cross Keys Road (Gloucester Township) &
320 Erial Road (Winslow Township)
United States Department of the Army

Summary: Phase I/II archaeological survey identified an ephemeral Late Archaic period Native American archaeological site within the Alternative 2 Erial Road area of potential effects. This **new SHPO Opinion** finds the **Andrews Prehistoric Site (28-Ca-121)** eligible for listing on the New Jersey and National Registers of Historic Places under Criterion D for its ability to provide new information on Native American settlement and exploitation of the upper Great Egg Harbor River drainage. However, additional archaeological survey of the Andrews Prehistoric Site (28-Ca-121) has only a low potential to yield any additional artifacts or information important in prehistory. Therefore, the undertaking will have **conditional no adverse effect** on the Andrews Prehistoric Site (28-Ca-121) provided that the artifact collection is curated in accordance with 36 CFR Part 79.

Thank you for providing the opportunity for review and comment on the potential for the above-referenced undertaking to affect historic properties pursuant Section 106 of the National Historic Preservation Act, as amended. The comments below are in response to the following Phase I/II cultural resources survey report received at the Historic Preservation Office (HPO) on April 20, 2009:

Wieczorek, Scott, Zachary J. Davis & Carolyn Keenan
January, 2009 *Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Actions, Preferred Site & Alternatives 2 Site, Gloucester & Winslow Townships, Camden County, New Jersey.* Prepared for the United States Department of the Army. Prepared by the Louis Berger Group, Inc., Morristown, NJ.

800.4 Identifying Historic Properties

The historic architectural survey for the above-referenced report assessed the following four structures over 50 years of age within the architectural area of potential effects (APE) as **not eligible** for listing on the National Register of Historic Places (NRHP) based on the lack of historic and/or architectural significance and/or their loss of architectural integrity: 389 Cross Keys Road; Mongan's Gas Station (438 Williamstown Road); Andrews House (324/320 Erial Road); and William R. Andrews House (319 Erial Road). The report does not recommend additional architectural survey for this undertaking. The HPO *concurs* with this assessment.

The archaeological survey for the above-referenced report assessed the Hoffman Pig Farm Prehistoric Site (28-Ca-122) as **not eligible** for listing on the National Register of Historic Places (NRHP) based on the level of Phase I/II testing, recovery of only three debitage flakes, and lack of any diagnostic artifacts. The report does not recommend additional archaeological survey for this undertaking. The HPO *concurs* with this assessment.

The above-referenced archaeological survey assessed the **Andrews Prehistoric Site (28-Ca-121)** as eligible for listing on the New Jersey and National Registers of Historic Places under Criterion D. Based on the lack of known archaeological sites in the area, the report recommends the recovered Late Archaic period Poplar Island projectile point, quartz biface, and chert biface reduction flake provides new information on Native American exploitation for this section of the Great Egg Harbor River drainage. The HPO *concurs* with this assessment. In consequence, this is a **new SHPO opinion** of eligibility.

800.5 Applying the Criteria of Adverse Effect

Based on the amount of Phase I/II archaeological testing, paucity of Native American artifacts, and lack of any identified archaeological features, any additional archaeological survey is unlikely to yield additional information on the eligible Andrews Prehistoric Site (28-Ca-121). In consequence, the proposed AFRC undertaking will have **conditional no**

adverse effect on the Andrews Prehistoric Site (28-Ca-121) provided that the artifact collection is curated in accordance with 36 CFR Part 79. Therefore, pursuant to 36 CFR Part 800.5(c), the project may proceed, as proposed unless resources are discovered during project implementation, pursuant to 36 CFR Part 800.13.

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. If you have any questions, please feel free to contact Vincent Maresca of my staff at (609) 633-2395 with questions regarding archaeology or Jonathan Kinney (609-984-0141) with questions regarding historic architecture, historic districts, or historic landscapes.

Sincerely,

Daniel D. Saunders
Deputy State Historic Preservation Officer

c. Laura Dell'Olio, 99TH Regional Support Command
Spence H. Smith, Louis Berger group Inc.

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

REPLY TO
ATTENTION OF

March 9, 2010

Katherine J. Marcopul
New Jersey Department of Environmental Protection
Natural and Historic Resources
Historic Preservation Office
PO Box 404
501 East State Street, 3rd Floor
Trenton, NJ 08625-0404

Dear Ms. Marcopul:

The United States Army Reserve, Regional Support Command is proposing land acquisition and construction and operation of a U.S. Armed Forces Reserve Center (AFRC) in Camden County, New Jersey (NJ), in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The Department of Army is preparing an Environmental Assessment and conducting a cultural resource assessment for the proposed action in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the National Historic Preservation Act of 1966, as amended (PL 89-6650), its implementing authority, Section 106 of 36 CFR 800; the Archaeological and Historic Preservation Act of 1974; the Native American Graves Protection and Repatriation Act of 1990; Executive Order #11593 "Protection and Enhancement of the Cultural Environment"; the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); and the Environmental Analysis of Army Actions (32 CFR Part 651).

By correspondence dated April 10, 2009 (Enclosure 1) your office was previously consulted regarding the Proposed Action for two alternative sites; 389 Cross Keys Road in Gloucester Township, Camden County, NJ, and 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ. By return correspondence dated August 20, 2009, your office provided a **conditional no adverse effect** determination that construction within the original two proposed alternative sites would have no adverse effect on cultural resources provided that the artifact collection recovered as part of the Phase IB Cultural Resource Survey was curated, which was carried out.

In response to public comments and concerns, the Army is now considering a third alternative site in addition to the Cross Keys Road and Erial Road sites. The third site is located at the

intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ (Camden County) (Enclosure 2). This site is County-owned property and is located outside of the Pinelands National Preserve. The site consists of approximately 12 acres and is also known as the 4-H County Fairgrounds. The property includes three structures (two barns and a snack bar) and a parking lot for Camden County Health Department employees that would all need to be demolished. Camden County will be responsible for relocating these facilities. There are wetlands associated with the adjacent South Branch of the Big Timber Creek along the western portion of the parcel (Enclosure 3). A Phase 1B cultural resource assessment is recommended for the third alternative site located in Blackwood, NJ due to the site's location near Big Timber Creek.

We seek your concurrence with the recommendation discussed above. If you require additional information or have questions or concerns pertaining to this correspondence, please contact: Ms. Robyn Mock, U.S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil.

Sincerely,

FOR

Jose E. Cepeda
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Previous Correspondence
Enclosure 2: Alternative 3 Location for BRAC Proposed Action – USGS Topographic Map
Enclosure 3: Alternative 3 Location for BRAC Proposed Action – Aerial Photo

HPO- D2010-60
Log# 09-1000-4

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

April 9, 2010

Colonel Jose E. Cepeda
Department of the Army
Headquarters, 99th Regional Support Command
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

Dear Colonel Cepeda:

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 consultation comments on the following proposed undertaking:

Camden County, Gloucester Township
Armed Forces Reserve Center &
Implementation of BRAC 05 Realignment Actions
Alternative 3 Site
Intersection of Woodbury-Turnersville Road and Salina Road

These comments were prepared in response to your letter of March 9, 2010 and supporting documentation received by the Historic Preservation Office (HPO) on March 10, 2010.

<u>800.4 Identification of Historic Properties</u>

Archaeology

HPO concurs that Phase IB survey is appropriate to identify the presence or absence of archaeological deposits within the project's area of potential effects. If archaeological resources are identified, Phase II survey will provide for evaluation of the National Register eligibility of the site(s) and assessment of project impacts. For properties on or eligible for National Register inclusion, recommendations must be provided for avoidance of impacts. If impacts cannot be avoided, analyses must be provided exploring

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alternatives to minimize and/or mitigate impacts. Means to avoid, minimize and/or mitigate impacts to National Register eligible properties will need to be developed and undertaken prior to project implementation.

All phases of the archaeological survey and reporting will need to be in keeping with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*, and the HPO's *Guidelines for Phase I Archaeological Investigations: Identification of Archaeological Resources and Guidelines for Preparing Cultural Resources Management Archaeological Reports Submitted to the Historic Preservation Office*. These guidelines can be obtained through the HPO's web page at: (http://www.nj.gov/dep/hpo/1identify/survarkeo.htm). Reasoning and documentation for areas excluded from testing must be included in the technical report. Evaluations to determine the National Register eligibility of archaeological sites must be in keeping with the National Park Service's 2000 National Register Bulletin, *Guidelines for Evaluating and Registering Archeological Properties*. The individual(s) conducting the work will need to meet the relevant *Secretary of the Interior's Professional Qualifications Standards* for archaeology.

Architecture

Although your submitted letter references a "Phase IB cultural resource assessment," no mention is made of an architectural survey. The Department of the Army must delineate an architectural Area of Potential Effects (APE) for Alternative Site 3 in consultation with the HPO and any additional consulting/interested parties that have been identified. In addition to the architectural resources located on the property which will be directly affected, the architectural APE should also include the surrounding properties that may be indirectly affected. Indirect effects can be visual or audible effects or even changes in land use or traffic patterns caused by the project. An examination of historic aerial images by HPO staff revealed a number of buildings over 50 years of age which are still extant and located directly adjacent to Alternative Site 3.

Once an architectural APE has been agreed upon, the HPO requests that an intensive-level Architectural Survey be completed in order to properly identify resources that may be affected. The intensive-level Architectural Survey must be conducted in accordance with the HPO's *Guidelines for Architectural Survey* (www.state.nj.us/dep/hpo/1identify/identify.htm). All survey work, as well as any eligibility evaluations, should be performed by individuals who meet the National Park Service's *Professional Qualifications Standards* for architectural history and/or history.

Additional Comments

The HPO appreciates the opportunity to review and comment on the potential for the proposed undertaking to affect historic and archaeological resources. If you have any questions regarding this letter, please do not hesitate to contact Jonathan Kinney at (609) 984-0141 with any questions regarding historic architecture, historic districts, or historic

landscapes, or Vincent Maresca at (609) 633-2395 with questions regarding archaeology. Thank you.

Sincerely,

Daniel D. Saunders
Deputy State Historic
Preservation Officer

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

REPLY TO
ATTENTION OF

May 28, 2010

Katherine J. Marcopul
New Jersey Department of Environmental Protection
Natural and Historic Resources
Historic Preservation Office
PO Box 404
501 East State Street, 3rd Floor
Trenton, NJ 08625-0404

Dear Ms. Marcopul,

In response to concerns expressed in your letter dated April 09, 2010, the Army has conducted intensive architectural and Phase IB archaeological surveys. The results of the surveys are combined in the report entitled "*Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Actions, Lakeland Site #2, Gloucester Township, Camden, New Jersey*", which I have provided with this letter for your review.

As discussed in previous correspondence, in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended, the Army proposed action consists of the construction of training and support facilities, parking areas, a maintenance shop, and military equipment parking. A more detailed description of the action is provided in Chapter 1 of the enclosed report. The entire Area of Potential Effect (APE) considers direct effects to all 12 acres of proposed development land. For indirect or visual effects, the APE includes all tax parcels within immediate view of the project locations. Figure 2 of the enclosed report provides the limits of the APE as currently defined. The proposed site is located at the intersection of Woodbury-Turnersville Road and Salina Road in Blackwood, NJ (Gloucester Township, Camden County). The site, also known as the 4-H County Fairgrounds, is County-owned property located outside of the Pinelands National Preserve. The property currently includes three structures (two barns and a snack bar) and a parking lot for Camden County Health Department employees. All existing structures will be demolished as part of the proposed action.

Although the property is the location of the former County Farm Complex, no previously recorded sites located within the property were found during archaeological background research. Intensive pedestrian surveys and subsurface testing (n=313) found remnants of the former historic activity on the property. The survey also revealed an extremely light scatter of prehistoric material (n=6) including lithic debitage and one diagnostic Madison projectile point. Based on the archaeological investigations and background research, the multi-component archaeological site recorded as 28-CA-123 is recommended as ineligible for listing on the NRHP.

The architectural survey of the APE found 17 structures to date fifty years or older, including the two 4-H barns located on the subject property. Both barns were found to be ineligible for listing on the NRHP. The snack bar was not found to meet either the age or other criteria necessary for listing on the NRHP. In addition, no structures within the direct view of the site have been found to qualify as historic properties.

In accordance with Section 106 of the NHPA, the lead Federal agency has the responsibility to determine the potential effects of an action on historic properties. Based on the results of the background research, Phase IB archaeological survey, and the intensive architectural survey, the Army, as lead Federal agency, has determined *no historic properties affected* by the proposed construction of the Camden AFRC at Alternative Site#3 as per 36 CFR 800.4(d)(1).

The Army respectfully requests for you to review the enclosed report and provide your concurrence with our *no historic properties affected* determination and the proposed undertaking within 30 days of receiving this correspondence.

I thank you in advance for your efforts, and request you direct your comments and questions to Ms. Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,

JEFFREY M HRZIC
Chief, Environmental Division

Enclosure 1: Cultural Resources Report

HPO-G2010-225
Log #09-1000-5,-6 JK

State of New Jersey

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
NATURAL & HISTORIC RESOURCES
HISTORIC PRESERVATION OFFICE
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

July 27, 2010

Mr. Jeffery M. Hrzic
Chief, Environmental Division
Department of the Army
Headquarters, 99TH Regional Support Command
5231 South Scott Plaza
Fort Dix, New Jersey 08640-5000

Dear Mr. Hrzic:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published with amendments in the Federal Register on 6 July 2004 (69 FR 40544-40555), I am providing **Consultation Comments** for the following proposed undertaking:

Camden County, Gloucester and Winslow Townships
Reserve Center and Implementation of
BRAC 05 Realignment Actions
Lakeland Site #2
Phase I/II Cultural Resource Investigations
United States Department of the Army

The comments below are in response to the following archaeological reports submitted with for review to the Historic Preservation Office (HPO):

Wieczorek, Scott, Zachary J. Davis and Abbie Hurlbut
May 2010 *Phase I/II Cultural Resource Investigations, Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Actions, Lakeland Site #2, Gloucester Township, Camden County, New Jersey.* Prepared by The Louis Berger Group, Inc., Morristown, NJ.

And

May 2010 *Environmental Assessment, Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Actions in Camden, New Jersey.* Prepared by U.S. Army Corps of Engineers, Mobile District, Mobile, AL.

800.4 Identifying Historic Properties

The above-referenced Phase I/II cultural resource investigation report identified the Lakeland multicomponent 1 archaeological site (28-Ca-123) within the project site. The Lakeland multicomponent 1 contained an ephemeral scatter of isolated Native American artifacts (6 artifacts) consisting of quartz and jasper debitage and a distal fragment of a possible chert Madison-type projectile point. The second component of the Lakeland multicomponent 1 consists of four concentrations of early-20th-century historic artifacts characterized as sheet middens and several former agricultural outbuilding remains from the early-20th-century Lakeland County Farm complex.

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The historic architectural survey for the above-referenced Phase I/II cultural resource investigation surveyed 17 structures, including the two 4-H barns within the physical area of potential effects (APE). The 17 structures over 50 years of age within the architectural APE were identified as a possible historic property – the Camden County Health Complex at Lakeland.

800.5 Assessment of Eligibility

The above-referenced Phase I/II cultural resource investigation report recommends the Lakeland multicomponent 1 archaeological site (28-Ca-123) is unlikely to yield information important in prehistory or history (Criterion D; 36 CFR 60.4) and, therefore, is not eligible for listing on the National Register of Historic Places (NR). *The HPO concurs with this assessment.*

In addition, the Phase I/II cultural resource investigation report recommends archaeological monitoring during the removal of the existing parking lot for potential shaft features (wells, privies or cisterns) from the former early-20th-century barn from the County Farm Complex in this general location. *The HPO disagrees with this recommendation.* Additional archaeological remains of the early-20th-century County Farm Complex, component elements of the already identified Lakeland multicomponent 1 archaeological site (28-Ca-123) determined ineligible for listing in the NR, is unlikely to unlikely to yield information important in history (Criterion D; 36 CFR 60.4). Therefore, no additional archaeological survey is recommended.

The above-referenced Phase I/II cultural resource investigation report recommends, based on the lack of: 1) historical and architectural significance; and 2) loss of historic or architectural integrity; that the Camden County Health Complex at Lakeland is ineligible for listing on the NR. The report concludes that there will be no visual or physical effect to any historic properties eligible for or listed on the NR. The report recommends that if project plans chance, additional research and evaluation of resources and the potential project effects may be required.

In consequence, I concur that no historic properties are affected within the project's 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

Additional Comments

Thank you again for providing the opportunity to review and comment on this potential for the above undertaking to affect historic properties. Please be aware, the HPO requests that a CD containing a PDF copy of the Phase I/II report is provided to our office for accessing into our electronic database per HPO reporting guidelines. If you have any questions, please feel free to contact Vincent Maresca of my staff at (609) 633-2395 with questions regarding archaeology or Jonathan Kinney (609) 984-0141 with questions regarding historic architecture, historic districts, or historic landscapes.

Sincerely,

Daniel D. Saunders
Deputy State Historic
Preservation Officer

c. Laura Dell 'Oloi, 99TH Regional Support Command
Robin Mock, 99TH Regional Support Command

99TH RSC DPW, Environmental Division
5231 South Scott Plaza
Fort Dix, New Jersey 08640-5000

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

REPLY TO
ATTENTION OF

April 10, 2009

Ms. Tamara Francis
Cultural Preservation Director
Delaware Nation Cultural Preservation Office
PO Box 825
Anadarko, OK 73005

Dear Ms. Francis:

The Department of the Army (DA) is preparing an Environmental Assessment (EA) for the proposed construction of a new Armed Forces Reserve Center (AFRC) and associated support facilities in Camden County, NJ. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The EA will analyze and document potential environmental effects associated with the Army's proposed realignment actions. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Environmental Analysis of Army Actions (32 CFR Part 651); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The Army is evaluating two alternatives for implementing the proposed action. The preferred alternative is to construct the new AFRC on approximately 11 acres of land to be purchased at 389 Cross Keys Road in Gloucester Township Camden County, NJ (see Enclosure 1 & 3). The second alternative is to construct the facilities on approximately 10 acres of land to be purchased from a larger 34 acre parcel at 320 Erial Road in Sicklerville (Winslow Township, Camden County), NJ (see Enclosures 2 & 3). Both alternative sites are located outside of the Pinelands National Reserve.

In accordance with NEPA and Section 106 of the National Historic Preservation Act (NHPA) an evaluation of the potential impacts associated with implementing this action is required. To support the evaluation, the Army contracted with The Louis Berger Group Inc. (Berger) to conduct a Phase I/II cultural resource investigation at each alternative site being considered under the proposed action. The surveys were conducted in October and November, 2008. The

final Phase I/II Cultural Resource Investigation report is included as an enclosure to this correspondence (see Enclosure 4) with the key findings summarized below.

A survey was conducted of historic architecture throughout the architectural Area of Potential Effect (APE) for each site which consisted of tax parcels with an immediate view of the alternative sites. Four historic architectural resources were identified within the architectural APE; one at the Preferred Alternative site and three at the Alternative 2 site. Of these four properties, two were previously identified in a 1982 survey of cultural resources within the Great Egg Harbor and Tuckahoe River watersheds. Survey forms were not completed at that time and there is no N.J. Historic Preservation Office (NJHPO) opinion on file. The four identified architectural resources have been researched, photographed, and documented, and NJHPO Historic Resource Forms have been completed for each (see Enclosure 4). The significance and integrity of each property was also evaluated using National Register eligibility criteria (36 CFR 60). As a result of this survey, the two previously identified and the two newly identified properties are recommended by Berger as ineligible for listing on the National/State Registers due to either a lack of historical association, architectural significance, and/or a loss of architectural and/or historic integrity. As such, the Army does not anticipate that the proposed action would have any visual or physical effects on any historic architectural properties eligible for or listed on the New Jersey and National Register of Historic Places (NRHP).

The archaeological APEs for the Preferred Alternative and the Alternative 2 sites were defined as the entire 11 acre and 34 acre parcels respectively. Based on the results of an archaeological sensitivity assessment, Berger characterized approximately 8-acres of the Preferred Alternative site and approximately 16-acres of the Alternative 2 site as being sensitive for containing previously undocumented historic and/or prehistoric archaeological resources. Within both properties Berger excavated a total of 541 shovel test pits (STP) and two excavation units.

The excavations within the Preferred Alternative site recovered a total of 49 historic and 3 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter, or with the recent demolition of animal pens associated with a former pig farm that was operated on the property. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Two of the prehistoric artifacts, however, were found in close proximity to each other and included two chert flakes. These artifacts have been registered with the New Jersey State Museum as the Hoffman Farm Prehistoric Site (28-Ca-122) (see Enclosure 3 for location). The third prehistoric artifact was identified as an isolated piece of quartz block shatter.

The excavations within the Alternative 2 site recovered a total of 1,058 historic and 4 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter or modern episodes of ground disturbance, including the late 1950s demolition of a former barn, and more recent episodes of landscape modification associated with the expansion of the agricultural fields. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Three of the prehistoric artifacts; however, were found in close proximity to each other and included a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. These artifacts have been registered with the New Jersey State Museum as the Andrews Prehistoric Site (28-Ca-121) (see

Enclosure 3 for location). The fourth prehistoric artifact was identified as an isolated hammerstone.

Based on the results of the Phase I/II archaeological investigations, Berger has identified two prehistoric archaeological sites – 28-Ca-121, and 28-Ca-122. Both sites were evaluated with regard to their eligibility for listing on the National Register of Historic Places. For the Hoffman Prehistoric site (28-Ca-122) on the Preferred Alternative site additional excavations recovered only two artifacts, both chert flakes. No evidence of any cultural features or buried ground surfaces was encountered during excavation. Given the limited cultural material recovered from 28-Ca-122, the lack of diagnostic artifacts, and the lack of prehistoric features or buried ground surfaces, The Hoffman Prehistoric Site (28-Ca-122) did not yield, and is unlikely to yield information important in prehistory or history (Criterion D of 36 CFR 60.4, Criteria for Evaluation) and therefore is recommended as not eligible for listing on the NRHP. No further archaeological investigations are recommended for the Preferred Alternative site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Hoffman Prehistoric Site (28-Ca-122).

The Andrews Prehistoric Site (28-Ca-121) is located within the Alternative 2 site and consisted of a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. The artifacts have yielded new data with regard to the prehistory of the surrounding area – i.e., a diagnostic projectile point suggesting Middle Archaic period activity within the property. Therefore, the Andrews Prehistoric Site (28-Ca-121) is recommended eligible for listing on the NRHP under Criterion D (36 CFR 60.4, Criteria for Evaluation). Extensive subsurface testing within the limits of the Andrews Prehistoric Site (28-Ca-121) recovered only the three prehistoric artifacts and no features or buried ground surfaces. Due to the paucity of archaeological material recovered from 28-Ca-121, it is unlikely that further subsurface excavations would yield additional information. No further archaeological investigations are recommended for the proposed undertaking within the Alternative 2 site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Andrews Prehistoric Site (28-Ca-121).

We understand that although the Delaware Nation does not now reside in New Jersey, the Delaware Nation does maintain an interest in this area and we welcome your input. Your office will be provided with a copy of the EA when it is released for public review; however, we would appreciate any initial input you may have on the Proposed Action and the sites being considered. Thank you in advance for your cooperation in this matter. If there are any questions or if there is a need for additional information, please contact: Ms. Robyn Mock, U. S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil. Please provide any comments within 30 calendar days from day of receipt of this letter.

Sincerely,

For: Joseph H. Ledlow Deputy
Colonel, US Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Preferred Alternative Location for BRAC Proposed Action Topographic Map
Enclosure 2: Alternative 2 Location for BRAC Proposed Action Topographic Map
Enclosure 3: Prehistoric Site Locations on the Preferred Alternative and Alternative 2 Sites
Enclosure 4: Phase 1& 2 Cultural Resource Investigation

From: Pugh, David W [David.W.Pugh@usace.army.mil]
Sent: Monday, June 15, 2009 11:22 AM
To: tfrancis@delawarenation.com
Importance: High
Attachments: 2009-APR10-Camden LTR to Delaware Nation.pdf

Ms Francis:

This is a follow-up to my voice mail this morning concerning a federal action at Camden NJ; where the US Army 99th wants to build an Armed Forces Reserve Center.

Also attached is a copy of the original letter dated April 10th.

If you have any question, please call myself or Ms Robyn Mock at (609) 562-7662.

Thank you,
<<2009-APR10-Camden LTR to Delaware Nation.pdf>>
David W. Pugh
SAM/PD-M
109 Saint Joseph Street
Mobile, Alabama 36602-3630
(251)694-3761

The Delaware Nation
Cultural Preservation Office
P.O. Box 825 - 31064 State Highway 281- Anadarko, OK 73005
Phone: 405/247-2448 – Fax: 405/247-9393

NAGPRA ext. 121
Section 106 ext. 120
Museum ext. 120
Library ext. 134

Date: 9-28-09

Company: Dept. of the Army HQ, 99th Regional Support Command

TCNS#/County/State: Environmental Assessment (EA) for the Construction of A New Armed Forces Reserve Center (AFRC) and associated Support Facilities Camden Co., New Jersey

To Whom It May Concern:

The Delaware Nation received a letter regarding the above referenced project(s). The Delaware Nation is committed to protecting sites important to tribal heritage, culture and religion. Furthermore, the tribe is particularly concerned with archaeological sites that may contain human burial remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find the Lenape people occupied these areas either historically or prehistorically. However, the location of the project does not endanger known sites of interest to the Delaware Nation. Please continue with the project as planned. However, should this project inadvertently uncover an archaeological site or object(s) we request that you immediately contact the appropriate state agencies, as well as the Delaware Nation (within 24 hours). Also, we ask that you halt all construction and ground disturbing activities until the tribe and these state agencies are consulted.

Please note the Delaware Nation and the Stockbridge-Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these two tribes, Tamara Francis (Delaware Nation) and Sherry White(Stock-Bridge Munsee). We appreciate your cooperation in contacting the Delaware Nation. Should you have questions, feel free to contact our offices at 405/247-2448 ext. 120 or by email tfrancis@delawarenation.com.

Sincerely,

Tamara Francis
Cultural Preservation Director

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

REPLY TO
ATTENTION OF

March 9, 2010

Ms. Tamara Francis
Cultural Preservation Director
Delaware Nation Cultural Preservation Office
PO Box 825
Anadarko, OK 73005

Dear Ms. Francis:

The United States Army Reserve, Regional Support Command is proposing land acquisition and construction and operation of a U.S. Armed Forces Reserve Center (AFRC) in Camden County, New Jersey (NJ), in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

By correspondence dated April 10, 2009 (Enclosure 1) your office was previously consulted regarding the Proposed Action for two alternative sites; 389 Cross Keys Road in Gloucester Township, Camden County, NJ, and 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ. By return correspondence dated September 28, 2009 your office determined that the location of the project would not endanger known sites of interest to the Delaware Nation.

In response to public comments and concerns, the Army is now considering a third alternative site in addition to the Cross Keys Road and Erial Road sites. The third site is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ (Camden County) (Enclosure 2). This site is County-owned property and is located outside of the Pinelands National Preserve. The site consists of approximately 12 acres and is also known as the 4-H County Fairgrounds. The property includes three structures (two barns and a snack bar) and a parking lot for Camden County Health Department employees that would all need to be demolished. Camden County will be responsible for relocating these facilities. There are wetlands associated with the adjacent South Branch of the Big Timber Creek along the western portion of the parcel (Enclosure 3). A Phase 1B cultural resource assessment will be conducted for this alternative site.

Please accept this correspondence as notification and invitation to participate in the consultation process concerning this action, as required by the National Historic Preservation Act of 1966 (NHPA), as amended; the Archaeological Resources Protection Act of 1979; the Native American Graves Protection and Repatriation Act of 1990; and Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments.* In accordance with the above

regulations, we are proposing to conduct a cultural resource assessment as discussed above for this project. If you wish to participate in the process, please contact us within 30 days of the date of this letter. In addition, we are requesting that you provide information about any known Traditional Cultural Properties or sacred sites within the proposed development tracts.

I look forward to working with you or your designated representative. If we do not hear from you within 30 days, we will assume that you concur with our determination and will proceed as discussed above. If you require additional information or have questions or concerns pertaining to this correspondence, please contact: Ms. Robyn Mock, U.S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil.

Sincerely,

FOR:

Jose E. Cepeda
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Previous Correspondence
Enclosure 2: Alternative 3 Location for BRAC Proposed Action – USGS Topographic Map
Enclosure 3: Alternative 3 Location for BRAC Proposed Action – Aerial Photo

Smith, Spence

From: Smith, Spence
Sent: Thursday, April 22, 2010 3:06 PM
To: Smith, Spence
Subject: Woodbury-Turnersville Road and Salina road "Third Alternative Site" (UNCLASSIFIED)

From: Jason Ross [mailto:JRoss@delawarenation.com]
Sent: Thursday, April 22, 2010 11:44 AM
To: Mock, Robyn A CTR CTR USAR 99TH RSC -NA-
Subject: Re: Woodbury-Turnersville Road and Salina road "Third Alternative Site"

Hello Ms. Mock,

The Delaware Nation received correspondence regarding the third alternative site that is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, Camden County, New Jersey.

The Delaware Nation will be a consulting party on this project and at this time we do no know of any culture sites.

As described in your correspondence and, upon research of our database and files we find that the location of the project does not endanger known archaeological sites of interest to the Delaware Nation. Should this project inadvertently uncover an archaeological site we request that you immediately contact the appropriate state agencies, as well as the Delaware Nation. Also, we ask that you halt all construction and ground disturbing activities until the tribe and these state agencies are consulted.

Thank you again for consulting with the Delaware Nation,

Jason Ross

Museum/Section 106 Assistant
Cultural Preservation Department
The Delaware Nation
P.O. Box 825
Anadarko, OK 73005
PH# 405) 247-2448
FAX# 405) 247-8905

www.delawarenation.com

Classification: UNCLASSIFIED
Caveats: FOUO

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

REPLY TO
ATTENTION OF

June 7, 2010

Jason Ross
Museum/Section 106 Assistant
Cultural Preservation Department
The Delaware Nation
P.O. Box 825
Anadarko, OK 73005

Mr. Ross:

As you know, the United States Army Reserve, 99th Regional Support Command is proposing land acquisition, construction, and operation of a U.S. Armed Forces Reserve Center in Camden County, New Jersey (NJ), in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended. A third location was identified for assessment, known as Alternate#3.

In response to requirements of 36 CFR 800 the Army has conducted an intensive Phase IB archaeological survey, and an intensive architectural survey. The results of the surveys are combined in the report entitled "*Construction of an Armed Forces Reserve Center and Implementation of BRAC 05 Realignment Actions, Lakeland Site #2, Gloucester Township, Camden, New Jersey*". In response to your interest expressed on this project via previous correspondence, the cultural report is provided for your review and comments.

I thank you in advance for your efforts, and request you direct your comments and questions to Ms. Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Respectfully,

JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:
Enclosure 1: Phase I/II Cultural Resources Investigation

The Delaware Nation
Cultural Preservation Office
31064 State Highway 281~ P.O. Box 825~ Anadarko, OK 73005
Phone: 405/247-2448~ Fax: 405/247-8905

Library ext. 1196
Museum ext. 1180
NAGPRA ext. 1182
Section 106 ext. 1180

Date: 7-21-10

Company: Dept. of The Army HQ, 99th Regional Support Command

TCNS#/County/State: BRAC 05 Realignment Actions
Lakeland Site #2, Gloucester Township
Camden County, New Jersey

To Whom It May Concern:

The Delaware Nation received a letter regarding the above referenced project(s). The Delaware Nation is committed to protecting sites important to tribal heritage, culture and religion. Furthermore, the tribe is particularly concerned with archaeological sites that may contain human burials, remains, and associated funerary objects.

As described in your correspondence and upon research of our database(s) and files, we find the Lenape people occupied these areas either historically or prehistorically. However, location of the project does not endanger known sites of interest to the Delaware Nation. Please continue with the project as planned. However, should this project inadvertently uncover an archaeological site or object(s) we request that you immediately contact the appropriate state agencies, as well as the Delaware Nation (within 24 hours). Also, we ask that you halt all construction and ground disturbing activities until the tribe and these state agencies are consulted.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation. Should you have questions, feel free to contact our offices at 405/247-8903 or by email: tfrancis@delawarenation.com.

Sincerely,

Tamara Francis
Cultural Preservation Director
The Delaware Nation

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

REPLY TO
ATTENTION OF

April 10, 2009

Ms. Sherry White
Stockbridge Munsee Tribe
P.O. Box 70
N8510 Moh-He-Con-Nuck Rd.
Bowler, WI 54416

Dear Ms. White:

The Department of the Army (DA) is preparing an Environmental Assessment (EA) for the proposed construction of a new Armed Forces Reserve Center (AFRC) and associated support facilities in Camden County, NJ. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The EA will analyze and document potential environmental effects associated with the Army's proposed realignment actions. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Environmental Analysis of Army Actions (32 CFR Part 651); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The Army is evaluating two alternatives for implementing the proposed action. The preferred alternative is to construct the new AFRC on approximately 11 acres of land to be purchased at 389 Cross Keys Road in Gloucester Township Camden County, NJ (Enclosure 1 & 3). The second alternative is to construct the facilities on approximately 10 acres of land to be purchased from a larger 34 acre parcel at 320 Erial Road in Sicklerville (Winslow Township, Camden County), NJ (Enclosures 2 & 3). Both alternative sites are located outside of the Pinelands National Reserve.

In accordance with NEPA and Section 106 of the National Historic Preservation Act (NHPA) an evaluation of the potential impacts associated with implementing this action is required. To support the evaluation, the Army contracted with The Louis Berger Group Inc. (Berger) to conduct a Phase I/II cultural resource investigation at each alternative site being considered under the proposed action. The surveys were conducted in October and November, 2008. The

final Phase I/II Cultural Resource Investigation report is included as an enclosure to this correspondence (Enclosure 4) with the key findings summarized below.

A survey was conducted of historic architecture throughout the architectural Area of Potential Effect (APE) for each site which consisted of tax parcels with an immediate view of the alternative sites. Four historic architectural resources were identified within the architectural APE; one at the Preferred Alternative site and three at the Alternative 2 site. Of these four properties, two were previously identified in a 1982 survey of cultural resources within the Great Egg Harbor and Tuckahoe River watersheds. Survey forms were not completed at that time and there is no N.J. Historic Preservation Office (NJHPO) opinion on file. The four identified architectural resources have been researched, photographed, and documented, and NJHPO Historic Resource Forms have been completed for each (see Enclosure 4). The significance and integrity of each property was also evaluated using National Register eligibility criteria (36 CFR 60). As a result of this survey, the two previously identified and the two newly identified properties are recommended by Berger as ineligible for listing on the National/State Registers due to either a lack of historical association, architectural significance, and/or a loss of architectural and/or historic integrity. As such, the Army does not anticipate that the proposed action would have any visual or physical effects on any historic architectural properties eligible for or listed on the New Jersey and National Register of Historic Places (NRHP).

The archaeological APEs for the Preferred Alternative and the Alternative 2 sites were defined as the entire 11 acre and 34 acre parcels respectively. Based on the results of an archaeological sensitivity assessment, Berger characterized approximately 8-acres of the Preferred Alternative site and approximately 16-acres of the Alternative 2 site as being sensitive for containing previously undocumented historic and/or prehistoric archaeological resources. Within both properties Berger excavated a total of 541 shovel test pits (STP) and two excavation units.

The excavations within the Preferred Alternative site recovered a total of 49 historic and 3 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter, or with the recent demolition of animal pens associated with a former pig farm that was operated on the property. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Two of the prehistoric artifacts, however, were found in close proximity to each other and included two chert flakes. These artifacts have been registered with the New Jersey State Museum as the Hoffman Farm Prehistoric Site (28-Ca-122) (Enclosure 3). The third prehistoric artifact was identified as an isolated piece of quartz block shatter.

The excavations within the Alternative 2 site recovered a total of 1,058 historic and 4 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter or modern episodes of ground disturbance, including the late 1950s demolition of a former barn, and more recent episodes of landscape modification associated with the expansion of the agricultural fields. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Three of the prehistoric artifacts; however, were found in close proximity to each other and included a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. These artifacts have been registered with the New Jersey State Museum as the Andrews Prehistoric Site (28-Ca-121) (Enclosure 3). The fourth prehistoric artifact was identified as an isolated hammerstone.

Based on the results of the Phase I/II archaeological investigations, Berger has identified two prehistoric archaeological sites – 28-Ca-121, and 28-Ca-122. Both sites were evaluated with regard to their eligibility for listing on the National Register of Historic Places. For the Hoffman Prehistoric site (28-Ca-122) on the Preferred Alternative site additional excavations recovered only two artifacts, both chert flakes. No evidence of any cultural features or buried ground surfaces was encountered during excavation. Given the limited cultural material recovered from 28-Ca-122, the lack of diagnostic artifacts, and the lack of prehistoric features or buried ground surfaces, The Hoffman Prehistoric Site (28-Ca-122) did not yield, and is unlikely to yield information important in prehistory or history (Criterion D of 36 CFR 60.4, Criteria for Evaluation) and therefore is recommended as not eligible for listing on the NRHP. No further archaeological investigations are recommended for the Preferred Alternative site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Hoffman Prehistoric Site (28-Ca-122).

The Andrews Prehistoric Site (28-Ca-121) is located within the Alternative 2 site and consisted of a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. The artifacts have yielded new data with regard to the prehistory of the surrounding area – i.e., a diagnostic projectile point suggesting Middle Archaic period activity within the property. Therefore, the Andrews Prehistoric Site (28-Ca-121) is recommended eligible for listing on the NRHP under Criterion D (36 CFR 60.4, Criteria for Evaluation). Extensive subsurface testing within the limits of the Andrews Prehistoric Site (28-Ca-121) recovered only the three prehistoric artifacts and no features or buried ground surfaces. Due to the paucity of archaeological material recovered from 28-Ca-121, it is unlikely that further subsurface excavations would yield additional information. No further archaeological investigations are recommended for the proposed undertaking within the Alternative 2 site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Andrews Prehistoric Site (28-Ca-121).

We understand that although the Stockbridge Munsee Tribe does not now reside in New Jersey, the Stockbridge Munsee Tribe does maintain an interest in this area and we welcome your input. Your office will be provided with a copy of the EA when it is released for public review; however, we would appreciate any initial input you may have on the Proposed Action and the sites being considered. Thank you in advance for your cooperation in this matter. If there are any questions, please contact: Ms. Robyn Mock, U. S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil. Please provide any comments within 30 calendar days from day of receipt of this letter.

Sincerely,

For: Deputy

Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Preferred Alternative Location for BRAC Proposed Action Topographic Map
Enclosure 2: Alternative 2 Location for BRAC Proposed Action Topographic Map
Enclosure 3: Prehistoric Site Locations on the Preferred Alternative and Alternative 2 Sites
Enclosure 4: Phase 1& 2 Cultural Resource Investigation

From: Pugh, David W [David.W.Pugh@usace.army.mil]
Sent: Monday, June 15, 2009 11:25 AM
To: sherry.white@mohican-nsn.gov
Subject: Federal Action at Camden NJ
Importance: High
Attachments: 2009-APR10-Camden LTRr to StockbridgeMunsee.pdf

Ms White:

This is a follow-up to my voice mail this morning concerning a federal action at Camden NJ; where the US Army 99th wants to build an Armed Forces Reserve Center.

Also attached is a copy of the original letter dated April 10th.

If you have any question, please call myself or Ms Robyn Mock at (609) 562-7662.

<<2009-APR10-Camden LTRr to StockbridgeMunsee.pdf>>
David W. Pugh
SAM/PD-M
109 Saint Joseph Street
Mobile, Alabama 36602-3630
(251)694-3761

Stockbridge-Munsee Tribal Historic Preservation Office

Sherry White - Tribal Historic Preservation Officer
W13447 Camp 14 Road
P.O. Box 70
Bowler, WI 54416

July 8, 2009

Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer
Headquarters, 99th regional Support Command
5231 south Scott Plaza
Fort Dix, NJ 08640-5000

RE: Proposed construction of a new Armed forces Reserve Center and support facilities in Camden Co., NJ

Dear Sir:

Thank you for contacting the Stockbridge-Munsee Tribe regarding the above referenced project. The Tribe is committed to protecting archaeological sites that are important to tribal heritage, culture and religion. Furthermore, the tribe is particularly concerned with archaeological sites that may contain human burial remains and associated funerary objects.

As described in your correspondence, the proposed ground disturbing activity of this project does not appear to endanger archaeological sites of interest to the Stockbridge-Munsee Tribe, therefore, the tribe will defer to your State Archaeologist and your state's Office of Historical Preservation regarding the need for archaeological surveys of further investigation. Should either of these agencies recommend an archaeological survey of the proposed construction site, we ask that the Stockbridge-Munsee Tribe be informed of the results of the survey should they uncover any Native American artifacts, including copies of site forms and reports. Also, any changes to the above referenced project should be resubmitted to the Historic Preservation Office.

Should this project inadvertently uncover an archaeological site, even after an archaeological survey, we request that you immediately contact the appropriate state agencies, as well as the Stockbridge-Munsee Tribe. Also, we ask that you halt all construction and ground disturbing activities until the Tribe and these state agencies are consulted.

We appreciate your cooperation in notifying the Historic Preservation Office. Should you have any questions, feel free to contact me.

Sincerely,

Sherry White/SJ

Sherry White,
Tribal Historic Preservation Officer

(715) 793-3970 *Email: sherry.white@mohican-nsn.gov*

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

REPLY TO
ATTENTION OF

March 9, 2010

Ms. Sherry White
Stockbridge Munsee Tribe
P.O. Box 70
N8510 Moh-He-Con-Nuck Rd.
Bowler, WI 54416

Dear Ms. White:

The United States Army Reserve, Regional Support Command is proposing land acquisition and construction and operation of a U.S. Armed Forces Reserve Center (AFRC) in Camden County, New Jersey (NJ), in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

By correspondence dated April 10, 2009 (Enclosure 1) your office was previously consulted regarding the Proposed Action for two alternative sites; 389 Cross Keys Road in Gloucester Township, Camden County, NJ, and 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ. By return correspondence dated July 8, 2009 your office determined that the locations of the project would not endanger archaeological sites of interest to the Stockbridge-Munsee Tribe.

In response to public comments and concerns, the Army is now considering a third alternative site in addition to the Cross Keys Road and Erial Road sites. The third site is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ (Gloucester Township, Camden County) (Enclosure 2). This site is County-owned property and is located outside of the Pinelands National Preserve. The site consists of approximately 12 acres and is also known as the 4-H County Fairgrounds. The property includes three structures (two barns and a snack bar) and a parking lot for Camden County Health Department employees that would all need to be demolished. Camden County will be responsible for relocating these facilities. There are wetlands associated with the adjacent South Branch of the Big Timber Creek along the western portion of the parcel (Enclosure 3). A Phase 1B cultural resource assessment will be conducted for this alternative site.

Please accept this correspondence as notification and invitation to participate in the consultation process concerning this action, as required by the National Historic Preservation Act of 1966 (NHPA), as amended; the Archaeological Resources Protection Act of 1979; the Native American Graves Protection and Repatriation Act of 1990; and Executive Order 13175,

Consultation and Coordination with Indian Tribal Governments. In accordance with the above regulations, we are proposing to conduct a cultural resource assessment as discussed above for this project. If you wish to participate in the process, please contact us within 30 days of the date of this letter. In addition, we are requesting that you provide information about any known Traditional Cultural Properties or sacred sites within the proposed development tracts.

I look forward to working with you or your designated representative. If we do not hear from you within 30 days, we will assume that you concur with our determination and will proceed as discussed above. If you require additional information or have questions or concerns pertaining to this correspondence, please contact: Ms. Robyn Mock, U.S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil.

Sincerely,

FOR:

Jose E. Cepeda
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Previous Correspondence
Enclosure 2: Alternative 3 Location for BRAC Proposed Action – USGS Topographic Map
Enclosure 3: Alternative 3 Location for BRAC Proposed Action – Aerial Photo

Stockbridge-Munsee Tribal Historic Preservation Office

Sherry White - Tribal Historic Preservation Officer
W13447 Camp 14 Road
P.O. Box 70
Bowler, WI 54416

TCNS#_____ Date 3-18-10
PROJECT # AERC - Camden Co., NJ.
COMPANY NAME Dept. of the Army

ADDITIONAL INFORMATION NEEDED

_____Site visit by Tribal Historic Preservation Officer
_____Archeological survey, phase 1
_____Literature/record search including colored maps
_____Pictures of site
_____SHPO report
_____Project does not appear to endanger archaeological sites of interest to the Stockbridge-Munsee Tribe.
X Out of area

Has site been previously disturbed?_____ _____
Yes No

If yes, to what extent and when?_____

Will the proposed action adversely affect properties listed, or eligible for, listing on the National Register of Historic Places? (buildings, archaeological sites; objects of significance to a Tribe including graves, funerary objects, and traditional cultural properties) _____ _____
Yes No

Should this project inadvertently uncover a Native American site, even after an archaeological survey or if there is a change to the project, we ask that you halt all construction and notify the Stockbridge-Munsee Tribe immediately.

Sincerely,

Sherry White/gj
Sherry White
Tribal Historic Preservation Officer

(715) 793-3970 *Email: sherry.white@mohican-nsn.gov*

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

REPLY TO
ATTENTION OF

April 27, 2009

Ms. Rebecca Hawkins, THPO
Shawnee Tribe Historic Preservation Office
29 South Highway 69A
Miami, Oklahoma, 74354

Dear Ms. Hawkins:

The Department of the Army (DA) is preparing an Environmental Assessment (EA) for the proposed construction of a new Armed Forces Reserve Center (AFRC) and associated support facilities in Camden County, NJ. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

The EA will analyze and document potential environmental effects associated with the Army's proposed realignment actions. The EA is being prepared in strict accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Environmental Analysis of Army Actions (32 CFR Part 651); and the Army 2006 Base Realignment and Closure Manual for Compliance with the National Environmental Policy Act.

The Army is evaluating two alternatives for implementing the proposed action. The preferred alternative is to construct the new AFRC on approximately 11 acres of land to be purchased at 389 Cross Keys Road in Gloucester Township Camden County, NJ (see Enclosure 1 & 3). The second alternative is to construct the facilities on approximately 10 acres of land to be purchased from a larger 34 acre parcel at 320 Erial Road in Sicklerville (Winslow Township, Camden County), NJ (see Enclosures 2 & 3). Both alternative sites are located outside of the Pinelands National Reserve.

In accordance with NEPA and Section 106 of the National Historic Preservation Act (NHPA) an evaluation of the potential impacts associated with implementing this action is required. To support the evaluation, the Army contracted with The Louis Berger Group Inc. (Berger) to

conduct a Phase I/II cultural resource investigation at each alternative site being considered under the proposed action. The surveys were conducted in October and November, 2008. The final Phase I/II Cultural Resource Investigation report is included as an enclosure to this correspondence (see Enclosure 4) with the key findings summarized below.

A survey was conducted of historic architecture throughout the architectural Area of Potential Effect (APE) for each site which consisted of tax parcels with an immediate view of the alternative sites. Four historic architectural resources were identified within the architectural APE; one at the Preferred Alternative site and three at the Alternative 2 site. Of these four properties, two were previously identified in a 1982 survey of cultural resources within the Great Egg Harbor and Tuckahoe River watersheds. Survey forms were not completed at that time and there is no N.J. Historic Preservation Office (NJHPO) opinion on file. The four identified architectural resources have been researched, photographed, and documented, and NJHPO Historic Resource Forms have been completed for each (see Enclosure 4). The significance and integrity of each property was also evaluated using National Register eligibility criteria (36 CFR 60). As a result of this survey, the two previously identified and the two newly identified properties are recommended by Berger as ineligible for listing on the National/State Registers due to either a lack of historical association, architectural significance, and/or a loss of architectural and/or historic integrity. As such, the Army does not anticipate that the proposed action would have any visual or physical effects on any historic architectural properties eligible for or listed on the New Jersey and National Register of Historic Places (NRHP).

The archaeological APEs for the Preferred Alternative and the Alternative 2 sites were defined as the entire 11 acre and 34 acre parcels respectively. Based on the results of an archaeological sensitivity assessment, Berger characterized approximately 8-acres of the Preferred Alternative site and approximately 16-acres of the Alternative 2 site as being sensitive for containing previously undocumented historic and/or prehistoric archaeological resources. Within both properties Berger excavated a total of 541 shovel test pits (STP) and two excavation units.

The excavations within the Preferred Alternative site recovered a total of 49 historic and 3 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter, or with the recent demolition of animal pens associated with a former pig farm that was operated on the property. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Two of the prehistoric artifacts, however, were found in close proximity to each other and included two chert flakes. These artifacts have been registered with the New Jersey State Museum as the Hoffman Farm Prehistoric Site (28-Ca-122) (see Enclosure 3 for location). The third prehistoric artifact was identified as an isolated piece of quartz block shatter.

The excavations within the Alternative 2 site recovered a total of 1,058 historic and 4 prehistoric artifacts. The historic artifacts were found to be associated with either historic field scatter or modern episodes of ground disturbance, including the late 1950s demolition of a former barn, and more recent episodes of landscape modification associated with the expansion of the agricultural fields. As such, the historic artifacts did not meet the New Jersey State Museum criteria for registration as historic archaeological sites. Three of the prehistoric artifacts; however, were found in close proximity to each other and included a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. These artifacts have been registered with the New Jersey State Museum as the Andrews Prehistoric Site (28-Ca-121) (see

Enclosure 3 for location). The fourth prehistoric artifact was identified as an isolated hammerstone.

Based on the results of the Phase I/II archaeological investigations, Berger has identified two prehistoric archaeological sites – 28-Ca-121, and 28-Ca-122. Both sites were evaluated with regard to their eligibility for listing on the National Register of Historic Places. For the Hoffman Prehistoric site (28-Ca-122) on the Preferred Alternative site additional excavations recovered only two artifacts, both chert flakes. No evidence of any cultural features or buried ground surfaces was encountered during excavation. Given the limited cultural material recovered from 28-Ca-122, the lack of diagnostic artifacts, and the lack of prehistoric features or buried ground surfaces, The Hoffman Prehistoric Site (28-Ca-122) did not yield, and is unlikely to yield information important in prehistory or history (Criterion D of 36 CFR 60.4, Criteria for Evaluation) and therefore is recommended as not eligible for listing on the NRHP. No further archaeological investigations are recommended for the Preferred Alternative site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Hoffman Prehistoric Site (28-Ca-122).

The Andrews Prehistoric Site (28-Ca-121) is located within the Alternative 2 site and consisted of a quartz Poplar Island projectile point, a quartz biface, and a chert biface reduction flake. The artifacts have yielded new data with regard to the prehistory of the surrounding area – i.e., a diagnostic projectile point suggesting Middle Archaic period activity within the property. Therefore, the Andrews Prehistoric Site (28-Ca-121) is recommended eligible for listing on the NRHP under Criterion D (36 CFR 60.4, Criteria for Evaluation). Extensive subsurface testing within the limits of the Andrews Prehistoric Site (28-Ca-121) recovered only the three prehistoric artifacts and no features or buried ground surfaces. Due to the paucity of archaeological material recovered from 28-Ca-121, it is unlikely that further subsurface excavations would yield additional information. No further archaeological investigations are recommended for the proposed undertaking within the Alternative 2 site. Therefore, the Army does not anticipate that the proposed action will create an adverse effect on historic properties as no additional information could be recovered from the Andrews Prehistoric Site (28-Ca-121).

We understand that although the Shawnee Tribe does not now reside in New Jersey, the Shawnee Tribe does maintain an interest in this area and we welcome your input. Your office will be provided with a copy of the EA when it is released for public review; however, we would appreciate any initial input you may have on the Proposed Action and the sites being considered. Thank you in advance for your cooperation in this matter. If there are any questions or if there is a need for additional information, please contact: Ms. Robyn Mock, U.S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil. Please provide any comments within 30 calendar days from day of receipt of this letter.

Sincerely,

Joseph H. Ledlow
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures
Enclosure 1: Preferred Alternative Location for BRAC Proposed Action Topographic Map
Enclosure 2: Alternative 2 Location for BRAC Proposed Action Topographic Map
Enclosure 3: Prehistoric Site Locations on the Preferred Alternative and Alternative 2 Sites
Enclosure 4: Phase I/II Cultural Resource Investigation

2009-APR27-Camden LTR to Shawn...

-----Original Message-----
From: Pugh, David W
Sent: Monday, June 15, 2009 10:08 AM
To: 'Auntweezer@msn.com'
Cc: 'Mock, Robyn A CTR CTR USAR 99TH RSC -NA-'
Subject: Camden NJ Coordination LTR

Dear Ms Jumper:

Thank you for speaking with me. Attached is a copy of the letter addressed to Ms Hawkins; if you have any further questions, please do not hesitate to contact me, as the Cultural Resource Specialist for BRAC. An accelerated repsonse would be greatly appreciated on the 99th's behalf.

If you have any specific project questions, you may want to contact Ms. Robyn Mock of the US Army 99th, at (609)562-7662 or robyn.mock@usar.army.mil

Again, thank you for your cooperation and I look forward to further communication with the Shawnee Tribe.

David W. Pugh
SAM/PD-M
109 Saint Joseph Street
Mobile, Alabama 36602-3630
(251)694-3761

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

REPLY TO
ATTENTION OF

March 9, 2010

Ms. Rebecca Hawkins
Shawnee Tribe Historic Preservation Office
29 South Highway 69A
Miami, Oklahoma, 74354

Dear Ms. Hawkins:

The United States Army Reserve, Regional Support Command is proposing land acquisition and construction and operation of a U.S. Armed Forces Reserve Center (AFRC) in Camden County, New Jersey (NJ), in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended. On September 8, 2005, the Defense Base Closure and Realignment Commission ("BRAC Commission") recommended to close the Nelson Brittin Army Reserve Center in Camden, NJ, and relocate units to a new consolidated AFRC in Camden, NJ that should have the capability to accommodate units from the New Jersey Army National Guard (NJARNG) Armory in Burlington, NJ if the Army is able to acquire suitable land for the construction of the facilities. To enable implementation of these recommendations, the Army proposes to provide the necessary facilities to support the recommended changes in force structure.

By correspondence dated April 10, 2009 (Enclosure 1) your office was previously consulted regarding the Proposed Action for two alternative sites; 389 Cross Keys Road in Gloucester Township, Camden County, NJ, and 320 Erial Road, Sicklerville, Winslow Township, Camden County, NJ.

In response to public comments and concerns, the Army is now considering a third alternative site in addition to the Cross Keys Road and Erial Road sites. The third site is located at the intersection of Woodbury-Turnersville Road and Salina Road in the Lakeland area of Gloucester Township, NJ (Camden County) (Enclosure 2). This site is County-owned property and is located outside of the Pinelands National Preserve. The site consists of approximately 12 acres and is also known as the 4-H County Fairgrounds. The property includes three structures (two barns and a snack bar) and a parking lot for Camden County Health Department employees that would all need to be demolished. Camden County will be responsible for relocating these facilities. There are wetlands associated with the adjacent South Branch of the Big Timber Creek along the western portion of the parcel (Enclosure 3). A Phase 1B cultural resource assessment will be conducted for this alternative site.

Please accept this correspondence as notification and invitation to participate in the consultation process concerning this action, as required by the National Historic Preservation Act of 1966 (NHPA), as amended; the Archeological Resources Protection Act of 1979; the Native American Graves Protection and Repatriation Act of 1990; and Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*. In accordance with the above regulations, we are proposing to conduct a cultural resource assessment as discussed above for this project. If you wish to participate in the process, please contact us within 30 days of the

date of this letter. In addition, we are requesting that you provide information about any known Traditional Cultural Properties or sacred sites within the proposed development tracts.

I look forward to working with you or your designated representative. If we do not hear from you within 30 days, we will assume that you concur with our determination and will proceed as discussed above. If you require additional information or have questions or concerns pertaining to this correspondence, please contact: Ms. Robyn Mock, U.S. Army Reserve 99th RSC, Department of Public Works, at (609) 562-7662 or at robyn.mock@usar.army.mil.

Sincerely,

FOR:

José E. Cepeda
Colonel, U.S. Army Reserve
Regional Engineer

Enclosures:
Enclosure 1: Previous Correspondence
Enclosure 2: Alternative 3 Location for BRAC Proposed Action – USGS Topographic Map
Enclosure 3: Alternative 3 Location for BRAC Proposed Action – Aerial Photo

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APPENDIX C— ECONOMIC IMPACT FORECAST SYSTEM (EIFS) MODEL

SOCIOECONOMIC IMPACT ASSESSMENT

Socioeconomic impacts are linked through cause-and-effect relationships. Military payrolls, local procurement of goods and services, and construction projects all contribute to the economic base of the region of influence (ROI). In this regard, changes at proposed alternative site in Camden, NJ, per the Proposed Action, would have a multiplier effect on the local and regional economy. With the Proposed Action, direct jobs would be created, generating new income and increasing personal spending. This spending generally creates secondary jobs and increases business volume.

THE ECONOMIC IMPACT FORECAST SYSTEM

The U.S. Army (Army), with the assistance of many academic and professional economists and regional scientists, developed the Economic Impact Forecast System (EIFS) to address the economic impacts of actions requiring analysis under the National Environmental Policy Act (NEPA) and to measure their significance. As a result of its designed applicability, and in the interest of uniformity, EIFS is used in NEPA assessments for a number of Army BRAC NEPA documents. The entire system is designed for the scrutiny of a populace affected by the actions being studied. The algorithms in EIFS are simple and easy to understand, but still have firm, defensible bases in regional economic theory.

EIFS was developed under a joint project of the U.S Army Corps of Engineers (USACE), the U.S. Army Environmental Policy Institute (AEPI), and the Computer and Information Science Department of Clark Atlanta University, Georgia. EIFS is an on-line system, and the EIFS Web application is hosted by the USACE, Mobile District. The system is available to anyone with an approved user-id and password. University staff and the staff of USACE, Mobile District is available to assist with the use of EIFS.

The databases in EIFS are national in scope and cover the approximately 3,700 counties, parishes, and independent cities that are recognized as reporting units by federal agencies. EIFS allows the user to define an economic ROI by identifying the counties, parishes, or cities to be analyzed. Once the ROI is defined, the system aggregates the data, calculates multipliers and other variables used in the various models in EIFS, and prompts the user for forecast input data.

THE EIFS MODEL

The basis of the EIFS analytical capabilities is the calculation of multipliers that are used to estimate the impacts resulting from Army-related changes in local expenditures or employment. In calculating the multipliers, EIFS uses the economic base model approach, which relies on the ratio of total economic

activity to basic economic activity. Basic, in this context, is defined as the production or employment engaged to supply goods and services outside the ROI or by federal activities (such as military installations and their employees). According to economic base theory, the ratio of total income to basic income is measurable (as the multiplier) and sufficiently stable so that future changes in economic activity can be forecast. This technique is especially appropriate for estimating aggregate impacts and makes the economic base model ideal for the EA and EIS process.

The multiplier is interpreted as the total impact on the economy of the region resulting from a unit change in its base sector; for example, a dollar increase in local expenditures due to an expansion of its military installation. EIFS estimates its multipliers using a location quotient approach based on the concentration of industries within the region relative to the industrial concentrations for the nation.

The user inputs into the model the data elements which describe the Army action: the change in expenditures, or dollar volume of the construction project(s); change in civilian or military employment; average annual income of affected civilian or military employees; the percent of civilians expected to relocate due to the Army's action; and the percent of military living on-post. Once these are entered into the EIFS model, a projection of changes in the local economy is provided. These are projected changes in sales volume, income, employment, and population. These four indicator variables are used to measure and evaluate socioeconomic impacts. Sales volume is the direct and indirect change in local business activity and sales (total retail and wholesale trade sales, total selected service receipts, and value-added by manufacturing). Employment is the total change in local employment due to the proposed action, including not only the direct and secondary changes in local employment, but also those personnel who are initially affected by the military action. Income is the total change in local wages and salaries due to the proposed action, which includes the sum of the direct and indirect wages and salaries, plus the income of the civilian and military personnel affected by the proposed action. Population is the increase or decrease in the local population as a result of the proposed action.

THE SIGNIFICANCE OF SOCIOECONOMIC IMPACTS

Once model projections are obtained, the Rational Threshold Value (RTV) profile allows the user to evaluate the significance of the impacts. This analytical tool reviews the historical trends for the defined region and develops measures of local historical fluctuations in sales volume, income, employment, and population. These evaluations identify the positive and negative changes within which a project can affect the local economy without creating a significant impact. The greatest

historical changes define the boundaries that provide a basis for comparing an action's impact on the historical fluctuation in a particular area. Specifically, EIFS sets the boundaries by multiplying the maximum historical deviation of the following variables:

		Increase	Decrease
Sales Volume	X	100%	75%
Income	X	100%	67%
Employment	X	100%	67%
Population	X	100%	50%

These boundaries determine the amount of change that will affect an area. The percentage allowances are arbitrary, but sensible. The maximum positive historical fluctuation is allowed with expansion because economic growth is beneficial. While cases of damaging economic growth have been cited, and although the zero-growth concept is being accepted by many local planning groups, military base reductions and closures generally are more injurious to local economics than are expansion.

The major strengths of the RTV are its specificity to the region under analysis and its basis on actual historical data for the region. The EIFS impact model, in combination with the RTV, has proven successful in addressing perceived socioeconomic impacts. The EIFS model and the RTV technique for measuring the intensity of impacts have been reviewed by economic experts and have been deemed theoretically sound.

APPENDIX D— AIR QUALITY APPLICABILITY ANALYSIS

GENERAL CONFORMITY APPLICABILITY ANALYSIS

This air quality applicability analysis was conducted to identify potential increases or decreases in criteria air pollutant emissions associated with the proposed construction of an Armed Forces Reserve Center, in Camden, NJ. The project will occur within a U.S. EPA designated moderate non-attainment zone for ozone and non-attainment for $PM_{2.5}$ and is subject to the federal conformity requirements. The purpose of the analysis is to apply the Federal General Conformity Rule established in 40 CFR, Part 93 entitled: *Determining Conformity of Federal Actions to State or Federal Implementation Plans* to the Proposed Action Alternative in order to determine any effect on air quality.

The federal conformity rules were established to ensure that federal activities do not hamper local efforts to control air pollution. In particular, Section 176(c) of the Clean Air Act (CAA) prohibits federal agencies, departments or instrumentalities from engaging in, supporting, licensing, or approving any action, in an area that is in non-attainment of the National Ambient Air Quality Standards (NAAQS), which does not conform to an approved state or federal implementation plan. Therefore, the agency must determine whether or not the project would interfere with the clean air goals in the State Implementation Plan (SIP).

1.0 PROJECT DESCRIPTION

The Proposed Action is to construct a new AFRC and associated support facilities in Camden, NJ to support six U.S. Army (Army) Reserve units and one New Jersey Army National Guard (NJARNG) unit relocating from the local area (Camden County and Burlington County, NJ). The proposed AFRC would provide a training facility with administrative, educational, assembly, library, learning center, vault, weapons simulator, and physical fitness areas for the relocating units. Associated support facilities include an Organizational Maintenance Shop (OMS), and an unheated storage building.

Supporting improvements proposed to complement the AFRC and associated facilities include paving, fencing, the extension of utilities to service the project, and general site improvements. AT/FP safety and security measures, including minimum stand-off distance from roads, parking areas and vehicle unloading areas, would be incorporated into the facility designs and siting, and accessibility for disabled persons would also be provided (U.S. Army, 2008a).

The approximate size of the AFRC and associated buildings is estimated at approximately 53,000 SF, and 7,000 SF and 1,200 SF, respectively, for the Operational Maintenance Shop (OMS) and unheated storage facilities. The associated parking is estimated at 2.25 acres.

2.0 METEOROLOGY/CLIMATE

Temperature is a parameter used in calculations of emissions for air quality applicability. The climate in Camden County, NJ varies seasonally. The average high temperature in Camden County, which includes the project sites, is 65 degrees F (TWC, ND).

3.0 CURRENT AMBIENT AIR QUALITY CONDITIONS

Camden County, NJ is part of the Philadelphia-Wilmington-Trenton airshed and has been classified by the U.S. EPA as being in moderate non-attainment for the criteria pollutant ozone, and in non-attainment for the criteria pollutant $PM_{2.5}$.

4.0 AIR QUALITY REGULATORY REQUIREMENTS

The U.S. EPA defines ambient air in 40 CFR Part 50 as "that portion of the atmosphere, external to buildings, to which the general public has access." In compliance with the 1970 Clean Air Act (CAA) and the 1977 and 1990 Clean Air Act Amendments (CAAA), the U.S. EPA has promulgated National Ambient Air Quality Standards (NAAQS). The NAAQS were enacted for the protection of the public health and welfare, allowing for an adequate margin of safety. To date, the U.S. EPA has issued NAAQS for six criteria pollutants: carbon monoxide (CO), sulfur dioxide (SO_2), particles with a diameter less than or equal to a nominal 10 micrometers (PM_{10}), particles with a diameter less than or equal to a nominal 2.5 micrometers ($PM_{2.5}$), ozone (O_3), nitrogen oxides (NO_X), and lead (Pb). Areas that do not meet NAAQS are called non-attainment areas.

The NAAQS for ozone and PM2.5 are in Table D-1.

Table D-1. Ambient Air Quality Standards for Ozone and PM2.5

Pollutant	Federal Standard	New Jersey Standard[2]
Ozone (O_3)[1] 8-Hour Average	 0.075 ppm	 0.075 ppm
Particulate Matter ($PM_{2.5}$)[1] 24-Hour Average Annual Arithmetic Mean	 35 µg/m^3 15 µg/m^3	
Suspended Particulates 24-Hour Annual Average		 75 ug/m^3 260 ug/m^3

1 Federal primary and secondary standards for this pollutant are identical.

Sources: U.S. EPA, 2008a; NJDEP, 1991

To regulate the emission levels resulting from a project, federal actions located in non-attainment areas are required to demonstrate compliance with the general conformity guidelines established in 40 CFR Part 93 *Determining Conformity of Federal Actions to State or Federal Implementation Plans* (the Rule). The project area is located within a non-attainment area; therefore, a General Conformity Rule applicability analysis is warranted.

Section 93.153 of the Rule sets applicability requirements for projects subject to the Rule through establishment of *de minimis* levels for annual criteria pollutant emissions. These *de minimis* levels are set according to criteria pollutant non-attainment area designations. Projects below the *de minimis* levels are not subject to the Rule. Those at or above the levels are required to perform a conformity analysis as established in the Rule. The *de minimis* levels apply to direct and indirect sources of emissions that can occur during the construction and operation phases of the action.

Direct emissions are those caused by or initiated by the federal action that occur at the same time and place as the action. Indirect emissions are those caused by the action, but which occur later in time and/or at a distance removed from the action itself, yet are reasonably foreseeable and the federal agency responsible for the action can maintain control as part of the actions program responsibility. Emissions are estimated for the ozone precursor pollutants nitrogen oxides (NO_x) and volatile organic compounds (VOC). Annual emissions for these compounds were estimated for the project to determine if it would be below or above the *de minimis* levels established in the Rule. The *de minimis* for moderate non-attainment areas for ozone in an ozone transport region is 100 tons per year (TPY) for NO_x and 50 TPY for VOC.

On July 11, 2006 U.S. EPA established *de minimis* levels for $PM_{2.5}$. The final rule established 100 TPY as the *de minimis* emission level under nonattainment for directly emitted $PM_{2.5}$ and each of the precursors that form it (sulfur dioxide (SO_2), NOx, VOC, and ammonia). This 100 TPY threshold applies separately to each precursor. This means that if an action's direct or indirect emissions of $PM_{2.5}$, SO_2, NO_x, VOC, or ammonia exceed 100 TPY, a General Conformity determination would be required. However, neither U.S. EPA nor New Jersey have found $PM_{2.5}$ problems in the region to be caused by VOC or ammonia and ammonia is not further addressed by the EA (VOC is addressed as an ozone precursor).

In addition to the evaluation of air emissions against *de minimis* levels, emissions are also evaluated for regional significance. A federal action that does not exceed the threshold emission rates of criteria pollutants may still be subject to a general conformity determination if the direct and indirect emissions from the action exceed ten percent of the total emissions inventory for a particular criteria pollutant in a

non-attainment or maintenance area. If the emissions exceed this ten percent threshold, the federal action is considered to be a "regionally significant" activity, and thus, the general conformity rules apply.

5.0 CONFORMITY APPLICABILITY ANALYSIS

This project construction- and operations-related General Conformity analysis was performed for the proposed action in Camden, NJ. This conformity analysis and air emissions evaluation will follow the criteria regulated in *40 CFR Parts 6, 51, and 93, Determining Conformity of General Federal Actions to State or Federal Implementation Plans; Final Rule* (November 30, 1993).

5.1 CONSTRUCTION PHASE EMISSIONS

Construction emissions would result from the operation of heavy equipment and the painting of the building structures and parking spaces. The project would utilize a mix of heavy equipment for demolition and construction, mainly associated with preparing the site for the buildings and utility relocation.

5.1.1 Emissions from Heavy Equipment

Annual emissions were calculated for various types of diesel construction vehicles using model emission rate input for the year 2010 in U.S. EPA's *Nonroad2005 Emission Inventory Model: Diesel Construction Equipment, Camden County, New Jersey* (U.S. EPA, 2005). Truck emission levels were calculated using EPA's *MOBILE6* model for an average temperature of 65 °F (U.S. EPA 2006). The total annual emissions, in tons per year were determined for each vehicle based on the number of vehicles used and the number of operating hours per year. While the expected construction period is two years, this analysis assumes a one year construction timeframe for a more conservative analysis.

Emissions factors used for construction vehicles are shown in Table D-2. It was assumed that delivery trucks would travel 20 miles per trip, making three trips a day, for a total of 60 miles a day. The pick-up truck would travel 10 miles per day, used primarily in job management. Water tankers were assumed to travel 20 miles per day supporting earth operations, and dump trucks were assumed to make two-34-mile round trips per day for a total of 68 miles per day.

Table D-2. Emissions Factors for Construction Vehicles

Construction Vehicle Type	Emissions Factors lbs/hr-vehicle			
	NOx	VOC	$PM_{2.5}$	SO_2
Front End Loader	2.750	0.205	0.205	0.496
Excavator	2.946	0.156	0.190	0.529
Dozer	3.058	0.302	0.382	0.551
Pneumatic Tire Roller	0.898	0.094	0.115	0.156
Steel Wheel Roller	0.898	0.094	0.115	0.156
Asphalt Paver	1.214	0.098	0.106	0.215
Vibratory Roller	1.392	0.112	0.120	0.240
Grader	1.419	0.115	0.128	0.265
Concrete Pumper Truck	1.990	0.150	0.148	0.331
Concrete Truck	1.990	0.150	0.148	0.331
Crane	1.014	0.076	0.065	0.164
Backhoe	1.439	0.343	0.269	0.213
Water Tanker*	6.033	0.285	0.160	0.003
Dump Truck*	6.033	0.285	0.160	0.003
Pick-Up Truck*	0.743	1.166	0.011	0.007
Delivery Truck (Medium)*	2.289	1.533	0.042	0.017
Delivery Truck (Heavy)*	0.650	0.361	0.061	0.006
Air Compressor	0.591	0.062	0.058	0.093

* Units are in grams/mile/vehicle

5.1.1.1 Calculations for Construction Emissions

<u>Equipment and Vehicle Emissions</u>

Using the emissions factors in Table D-2, construction emissions were calculated for the proposed construction at Camden, NJ. Using the assumptions described above, the emissions in tons of NO_x, VOC, SO_2 and $PM_{2.5}$ for construction were calculated for each vehicle type using the appropriate equations displayed in Table D-3.

Table D-3. Equations for Construction Emissions Calculations

Emission Source	Equation	Sample Calculation
Heavy Equipment Emissions, On-Site Activities	(# of vehicle type) (Emission factor) (Total # of days in operation) (percent usage) (hours/day) (1 ton/2000 lbs) = tons of air emissions	(1 grader) (1.419lbs/hr/vehicle) (50 days in operation) (100% usage) (8 hours/day) (1 ton/2000 lbs) = 0.29 tons of NOx of equipment emissions
Construction Truck	(# vehicle type) (Emission factor) (Total # of days in operation) (miles/day)(1 ton/2000	(1 dump truck) (6.033 grams/mile/vehicle) (16 days)(68 miles/day)(1 lb/453.59 grams) (1 ton/2000 lb)

Emissions with Vehicle-miles	lbs) = tons of air emissions	= 0 .01 tons NO_x of vehicle emissions

Surface Disturbance (Fugitive $PM_{2.5}$)

The quantity of dust emissions of $PM_{2.5}$ from construction operations is assumed proportional to the days of construction activity on unpaved surfaces. The following sources for emission factors, with a capture fraction of 50 percent and silt and moisture contents of 20 percent, were used in $PM_{2.5}$ emission calculations for fugitive emissions (U.S. EPA, 2006).

- The unpaved road equation 13.2.2.1 equation 1a (AP-42 Chapter 13.2.2) is used to estimate fugitive emissions for the concrete pumper truck, concrete truck, crane, water truck, dump truck pickup truck, and delivery truck. Mileage on unpaved surface for each day of operation by vehicle type is estimated, then multiplied by the number of construction days.
- Front end loader and backhoe emissions combine unpaved road travel from equation 13.2.2.1 equation 1a and the dumping equation from AP-42 Chapter 11, Chapter 11.9-4.
- Dozer, pneumatic tire roller, and vibratory roller emissions are based on the dozer equation from AP-42 Chapter 11, Table 11.9-1.
- Grader emissions are based on the grader equation from AP-42 Chapter 11, Table 11.9-1.
- Scraper emissions are based on the "removing topsoil" equation from AP-42 Chapter 13, Table 13.2.3-1 and dumping equation from Chapter 11, table 11.9-4.2.

Resultant emission rates in lbs/day are presented in Table D-4.

Table D-4. Fugitive $PM_{2.5}$ Emission Factors for Construction Vehicles

Equipment/Vehicle Type	Fugitive $PM_{2.5}$ (lb/day)	Equipment/Vehicle Type	Fugitive $PM_{2.5}$ (lb/day)
Front End Loader	4.49	Concrete Pumper Truck	1.16
Dozer	1.77	Concrete Truck	1.16
Pneumatic Tire Roller	0.89	Water Tanker	13.39
Vibratory Roller	0.89	Dump Truck	11.16
Grader	0.01	Pick-Up Truck	2.64
Backhoe	2.25	Delivery Truck (Medium)	5.44
Crane	1.00	Delivery Truck (Heavy)	7.44

5.1.1.2 Alternative 1 – Cross Keys Road

Equipment requirements were estimated for the construction activities associated with site preparation for buildings, construction of the parking, and trenching for utilities. Demolition of the single existing residence on the site would contribute only a negligible amount to equipment emissions and is therefore not included in the calculations.

Table D-5 provides the equipment assumptions and resultant total equipment emissions for the Alternative 1 site.

Table D-5. Emissions for Construction Equipment – Alternative 1 Site

Construction Vehicle Type	Vehicle Days of Operation	Total Annual Emissions – TPY				
		NO_x	VOC	$PM_{2.5}$	Fugitive $PM_{2.5}$	SO_2
Front End Loader	10	0.094	0.007	0.007	0.020	0.017
Excavator	7	0.080	0.004	0.005	0.000	0.014
Dozer	9	0.107	0.011	0.013	0.008	0.019
Pneumatic Tire Roller	3	0.009	0.001	0.001	0.001	0.002
Steel Wheel Roller	5	0.019	0.002	0.002	0.000	0.003
Asphalt Paver	3	0.013	0.001	0.001	0.000	0.002
Vibratory Roller	57	0.317	0.025	0.027	0.025	0.055
Grader	50	0.289	0.023	0.026	0.000	0.053
Concrete Pumper Truck	84	0.669	0.051	0.050	0.049	0.111
Concrete Truck	200	1.592	0.120	0.119	0.116	0.265
Crane	144	0.584	0.044	0.038	0.072	0.094
Backhoe	5	0.029	0.007	0.005	0.006	0.004
Water Tanker	2	0.000	0.000	0.000	0.015	0.000
Dump Truck	16	0.005	0.000	0.000	0.064	0.000
Pick-Up Truck	240	0.002	0.003	0.000	0.317	0.000
Delivery Truck (Medium)	240	0.036	0.024	0.001	0.653	0.000
Delivery Truck (Heavy)	240	0.010	0.006	0.001	0.893	0.000
Air Compressor	385	0.908	0.095	0.089	0.000	0.142
Total Emissions		**4.763**	**0.627**	**0.386**	**2.238**	**0.782**

5.1.1.3 Alternative 2 – Erial Road

The Alternative 1 and Alternative 2 sites differ only in terms of demolition. The Alternative 2 site would not require any demolition. Emissions would be expected to be the same as Alternative 1.

5.1.1.4 Preferred Alternative – Lakeland

The Alternative 1 and Preferred Alternative sites would include similar site preparation and demolition requirements. Emissions would be expected to be the same as Alternative 1.

5.1.2 Emissions from Painting Activities

Emissions from painting parking spaces painting were based on four-inch wide stripes. It was assumed that the average parking space would be 9 feet wide by 19 feet long and every two parking spaces would share a common line. Approximately 10 square feet would be painted for every parking space. For parking spaces, it was assumed that alkyd paint would be used with a VOC content of three pounds

per gallon and one gallon of paint covers approximately 200 square feet. One coat of paint would be applied to the parking surfaces. Total VOC emissions from parking spaces would be 0.05 tons.

It was assumed that three coats of paint (one primer and two finishes) of water-based latex paint with a VOC content of one pound per gallon (one gallon of paint covers approximately 300 square feet) would be applied to approximately 30,000 square feet of interior surfaces. These values assume the interior space consists of rooms with drop ceilings or other surfaces not requiring paint and a ratio of walls needing paint to floor space of 2 to 1. Based on these assumptions, approximately 300 gallons of paint would be needed for the Proposed Action. Total interior painting for buildings would be expected to create approximately 0.15 tons of VOC emissions.

5.1.3 Summary of Construction Emissions

After the emissions analysis was performed for all aspects of construction, the totals were added to determine the combined construction emissions. Table D-6 displays a summary of the results.

Table D-6. Total Emissions for Construction – All Alternative Sites

Construction Activity	Total Annual Emissions – TPY			
	NO_x	VOC	$PM_{2.5}$	SO_2
Use of Heavy Equipment	4.763	0.424	2.624	0.782
Painting	N/A	0.203	N/A	N/A
Total Emissions from Construction	**4.763**	**0.627**	**2.624**	**0.782**

5.2 OPERATIONAL EMISSIONS

This section analyzes operational emissions from building heating sources, generators, and new commuters.

5.2.1 Heating Source Emissions

Designs for the proposed facilities have not yet been prepared; therefore, actual boiler or furnace types and sizes have not been determined. Operational heating requirements for the EA analysis are based on the most recent Commercial Buildings Energy Consumption Survey (CBECS) in 2003 conducted by the Department of Energy, Energy Information Administration. Table C30 from this document indicates that the average energy intensity for buildings using natural gas in climate zone 3, which includes Camden County, NJ (DOE, 2003). The average intensity for office space in zone 3 is 30.1

standard cubic feet of natural gas per square foot (SCF/SF) annually. The average intensity for warehouse/storage, as assumed for the OMS, is 30.7 SCF/SF.

Water heating is assumed to be included in these estimates or provided electrically.

The AFRC space heating for 54,000 SF of office space and 7,000 SF warehouse/storage space requires annually:

- (54,000 SF)(30.1 SCF/SF) + (7,000 SF)(30.7 SCF/SF) = 1.84 million SCF annually

The new buildings to be constructed are assumed to be heated by a small boiler that operates at less than 100 million Btu per hour. Operational heating emissions are based on the U.S. EPA's *AP-42 Fifth Edition, Compilation of Air Pollution Emission Factors Volume I, Chapter 1: Stationary Sources, Supplement E* (U.S. EPA, 1998).

The following natural gas emission rates are assumed:

- NO_x = 100 lb/10^6 SCF
- VOC = 5.5 lb/10^6 SCF
- $PM_{2.5}$ = 7.6 lb/10^6 SCF
- SO_2 = 0.6 lb/10^6 SCF

Given these assumptions the annual heating emissions at full operation are available in Table D-7.

Table D-7. Annual Heating Emissions

Alternative	Total Annual Emissions – TPY			
	NO_x	VOC	$PM_{2.5}$	SO_2
All Three Alternative Site Locations	0.092	0.005	0.007	0.001

5.2.2 Vehicle Emissions from Daily Commuters

Vehicle emissions from commuter vehicles are not included in this analysis. All incoming units are from within the Philadelphia-Wilmington-Trenton airshed and therefore there would be no net increase in commuter emissions as a result of the Proposed Action.

5.2.3 Emissions from Generators

There are no generators programmed for the AFRC.

5.2.4 Summary of Operation Emissions

Operational emissions include emissions from heating the building space and water, generator use, and emissions from employee traffic. Table D-8 combines all operational emissions.

Table D-8. Total Emissions from Operations

Operational Activity	Total Annual Emissions – TPY			
	NOx	VOC	PM2.5	SO2
Heating	0.092	0.005	0.007	0.001
Generator	NA	NA	NA	NA
Daily Commuters	NA	NA	NA	NA
Total	**0.092**	**0.005**	**0.007**	**0.001**

5.3 EMISSIONS FROM CONSTRUCTION AND OPERATIONS

Construction and operations emissions for each alternative site location are shown in Table D-9. This table also compares results to *de minimis* standards. Federal *de minimis* standards are based on the 8-hour ozone and $PM_{2.5}$ nonattainment determination.

The results in Table D-9 show that the emissions associated with constructing and operating the proposed facilities, when compared to the *de minimis* values for this moderate ozone non-attainment area and $PM_{2.5}$ nonattainment area, fall well below the Federal *de minimis* levels of 100 TPY for NO_x,

Table D-9. Summary of Emissions – All Three Alternative Site Locations

	Total Annual Emissions – TPY			
	NOx	VOC	$PM_{2.5}$	SO_2
Federal *de minimis* standards	**100**	**50**	**100**	**100**
Construction	4.763	0.627	2.624	0.782
Full Operation	0.092	0.005	0.007	0.001

50 TPY for VOC, and 100 for $PM_{2.5}$ and SO_2 even under the initial conservative assumptions that were employed.

5.4 REGIONAL SIGNIFICANCE

In addition to *de minimis* values, actions are also evaluated for regional significance. An action is considered to be regionally significant if the annual increase in emissions would make up 10 percent or

more of the available regional emission inventory. The *NJDEP State Implementation Plan (SIP) Revision for the Attainment and maintenance of the Ozone National Ambient Air Quality Standard* sets forth 2009 daily emission targets of 25.98 tons per day of VOC and 63.66 tons per day of NO_x for the Delaware Valley 8-hour ozone non-attainment area where Camden County is located (NJDEP, 2007). The increase in annual emissions from the construction and operational activities would not make up ten percent or more of the available regional emission target for VOC or NO_x and would not be regionally significant. *NJDEP State Implementation Plan (SIP) Revision for the Attainment and Maintenance of the Fine Particulate Matter National Ambient Air Quality Standard* sets forth 2009 annual emission targets of 14,752 ton for $PM_{2.5}$, 113,690 tons for NO_x, and 26,811 tons for SO_2 for the state of New Jersey (NJDEP, 2009). Emissions from the construction and operation of the Proposed Action would not exceed 10 percent of the emissions budget and would not be regionally significant for $PM_{2.5}$.

5.5 CONCLUSION

The results in Table D-9 show that the emissions associated with constructing and operating the proposed facilities, when compared to the *de minimis* values for this moderate ozone non-attainment area and $PM_{2.5}$ nonattainment area, fall well below the Federal *de minimis* levels of 100 TPY for NO_x, 50 TPY for VOC, and 100 for $PM_{2.5}$ and SO_2 even under the initial conservative assumptions that were employed. Emissions also are not regionally significant. Therefore, a full conformity determination is not required for any of the alternatives. A Record of Non-Applicability (RONA) can be found in Attachment One of this appendix.

6.0 REFERENCES

Clean Air Partners, n.d. *Air Quality Index.* Available Online. http://www.air-watch.net/aqiinfo.cfm. Accessed September 21, 2007.

DOE, 2003 U.S. Department of Energy, Energy Information Administration. *Commercial Buildings Energy Consumption Survey (CBECS)*. 2003.

NJDEP, 2009. New Jersey Department of Environmental Protection. *NJDEP State Implementation Plan (SIP) Revision for the Attainment and Maintenance of the Fine Particulate Matter National Ambient Air Quality Standard.* March 24, 2009.

NJDEP, 2007. New Jersey Department of Environmental Protection. *State Implementation (SIP) Revision for the Attainment and Maintenance of the Ozone National Ambient Air Quality Standard: 8-Hour Ozone Attainment Demonstration Final.* October 29, 2007.

NJDEP, 1991. New Jersey Department of Environmental Protection. *New Jersey Administrative Code Title 7, Chapter 27, Subchapter 13: Ambient Air Quality Standards.* May 6, 1991.

TWC, n.d. The Weather Channel. "Camden, NJ Averages" Available www.weather.com. Accessed November 14, 2008.

U.S. EPA, 2008a. U.S. Environmental Protection Agency. *National Primary and Secondary Ambient Air Quality Standards.* 40 CFR Part 50.

U.S. EPA, 2008b. U.S. Environmental Protection Agency. AP 42, Fifth Edition. *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*

U.S. EPA, 2006. U.S. Environmental Protection Agency. 2006. Nonroad2005 Emission Inventory Model: Diesel Construction Equipment, Camden County, New Jersey. Posted 2/10/2006. Model Run 11/21/08.

U.S. EPA, 2005. U.S. Environmental Protection Agency. 2005. *MOBILE6 Emission Factor Model, for Trucks year 2008 Vehicle Emissions.*

U.S. EPA, 1998. U.S. Environmental Protection Agency. 1998a. *Compilation of Air Pollutant Emission Factors, Volume I, Chapter 1 Supplement D: Stationary Sources, AP-42, 5th edition.*

ATTACHMENT ONE

AIR QUALITY RECORD OF NON-APPLICABILITY (RONA)

GENERAL CONFORMITY – RECORD OF NON-APPLICABILITY

Project/Action
Name: Implementation of BRAC 05 Realignment at Camden, NJ

Project/Action
Point of Contact: Laura Dell'Olio
Environmental/NEPA Specialist
Innovar Environmental Inc., supporting
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ, 08640
609-562-7661
laura.dellolio@usar.army.mil

Begin Date: September 23, 2005
End Date: September 15, 2011

General Conformity under the Clean Air Act, Section 176 has been evaluated for the project described above according to the requirements of 40 CFR 93, Subpart B. The General Conformity Rule applies to federal actions occurring in regions designated as being in non-attainment for the NAAQS or attainment areas subject to maintenance plans (maintenance areas). Threshold (*de minimis*) rates of emissions have been established for federal actions with the potential to have significant air quality impacts. If a project/action located in an area designated as non-attainment exceeds these *de mimimis* levels, a general conformity analysis is required. Camden County is designated as a moderate ozone (8-hour) non-attainment area in an ozone transport region, and a nonattainment area for particulate matter (2.5 microns) thus the NO_x, VOC, $PM_{2.5}$, and SO_2 thresholds apply.

A General Conformity Analysis of this project/action is not required because maximum annual direct and indirect emissions from this project/action have been estimated for both alternatives as:

NO_X: 4.763 tons per year (TPY); VOC: 0.627 TPY; $PM_{2.5}$: 2.624 tons; SO_2: 0.782 TPY

These are below the *de minimis* levels established in 40 CFR 93.153 (b) of:

NO_x: 100 tons; VOC: 50 tons; $PM_{2.5}$: 100 tons; SO_2: 100 tons

Furthermore, the project/action is not considered regionally significant under 40 CFR 93.153 (i). Camden County is in attainment for criteria pollutants NO_x, SO_2, PM_{10}, CO, and Pb and therefore these pollutants are not subject to conformity review.

Supporting documentation and emissions estimates can be found in Section 4.4 and Appendix D of the Environmental Assessment document.

for

JOSE E. CEPEDA
Colonel, U.S. Army Reserve
Regional Engineer

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APPENDIX E — COMMENTS RECEIVED AND RESPONSES

Introduction

A Notice of Availability (NOA) of the EA was published in the Courier-Post newspaper on July 2 and July 3, 2009 initiating a 30-day public comment period from July 2 to July 31, 2009.

During the initial 30-day comment period the U.S. Army received requests from the Mayor of Gloucester Township and other citizens to extend the comment period by 30 days to allow the public adequate time to review the document and provide comments. The Mayor and others also requested a public meeting be set up in Gloucester Township. The U.S. Army granted a 30-day extension of the comment period until August 30, 2009. The U.S. Army also agreed to conduct a public meeting on August 17, 2009 in Gloucester Township.

A total of forty seven sets of written comments on the EA were received from interested parties. In addition, a number of comments were made during the public meeting. The comments on the EA and the U.S. Army's responses to those comments are provided in this Appendix. All of the comment letters are provided in alphabetical order. After the comment letters, the comments by individual are summarized and the U.S. Army's responses are provided. Next, a summary of the comments that were made during the public meeting and the U.S. Army's responses to those comments is presented. Following these, the transcript of the public meeting is provided. One written comment regarding the lack of sewer capacity and the existence of a sewer moratorium at the Alternative 2 – Erial Road site resulted in changes to the analysis of the EA. These changes were made to the Alternative 2 – Erial Road Affected Environment portion of the Utilities Section (*Section 4.12.1.2 – Sanitary Sewer Service*) and the Alternative 2 – Erial Road Environmental Consequences portion of the Utilities Section (*Section 4.12.2.3 – Sanitary Sewer Service*). No other written comments or comments received during the public meeting resulted in changes to the analysis of the EA

Written comments were received during the public comment period from the following agencies, organizations and individuals:

Federal:
Congressman Robert Andrews

Indian Tribes:
Stockbridge-Munsee Tribal Historic Preservation Office
Sherry White

State Agency:
NJ Division of Fish and Wildlife
Kelly Davis

Local Government:

Gloucester Township
Mayor Cindy Rau-Hatton

Gloucester Township Economic Development Corporation
James Forte, Vice President

Gloucester Township Economic Development Corporation
Frederick Doolittle

Township of Winslow
Joseph Gallagher, Town Administrator

Citizens:

Sheila Alexander
Maureen Barra-Warner
Tina and Wayne Bridda
Lisa Cowne
Paulette Crawford
Linda DeWitt
Kandee Dias
Sandi Frehmel-Heim
Nancy Hawn
Denise Horgan
James Kibelstis
Deana Korcynski
Joseph Leckerman
Joe and Diane Lynch
Amy Mallonee
Michael and Michelle McGinness
Maureen McLaughlin
Fancis Mellace
Dennis Palmer
Diane and Frank Palogruto
Mary and Nicholas Palumbi
Beverly Pawlak
David and Marilyn Peoples
Lisa Phifer
Nancy Schmidt
Jay Stiefel
Marjorie and Maceo Thomas, Jr.
Shawn Thomas
Tom and Mary Vaccara

Alyssa Finley
62 Clement Dr.
Somerdale, NJ
08083

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Fax: 609.562.7983
Laura.dellolio@usar.army.mil

RE: 30-day public comment period for the BRAC Realignment Actions in Camden County, NJ

To whom it may concern:

I wish to oppose the construction of the proposed military facility on Cross Keys Road and would like to see such a facility built in a non-residential area. There are other non-residential, already tax-exempt properties that would offer a better fit for such a facility. The proposed facility would disrupt our neighborhood as well as depreciate our home values. We, the residents of Gloucester Township, do not want to hear drills and machinery during our weekend retreats in our backyards. We do not want our children's playground to be the backdrop for a parking lot or maintenance shop. Kindly look for an alternate site.

Thank you for taking the time to hear my voice.

Sincerely,

Alyssa M. Alyssa

From the Office of Mayor Cindy Rau-Hatton Gloucester Township

P. O. Box 8
Blackwood, NJ 08012
(856) 374-3514
Fax: (856) 374-5721

FAX TRANSMISSION COVER SHEET

Date: July 30, 2009

To: Laura Dell'Olio
Environmental/NEPA Specialist

Fax: 609-562-7983

Re:

Sender: *Joan M. Wagner (for Mayor Rau-Hatton)*

YOU SHOULD RECEIVE 2 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (856) 374-3514.

Attached is a copy of Congressman Robert Andrews' letter sent to Lieutenant General Van Antwerp on behalf of Mayor Cindy Rau-Hatton and Gloucester Township.

ROBERT E. ANDREWS
FIRST DISTRICT, NEW JERSEY

COMMITTEES:
EDUCATION AND THE WORKFORCE
SENIOR RANKING DEMOCRAT, SUBCOMMITTEE ON EMPLOYER-EMPLOYEE RELATIONS
MEMBER, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS

SELECT COMMITTEE ON HOMELAND SECURITY
MEMBER, SUBCOMMITTEE ON CYBERSECURITY, SCIENCE, AND RESEARCH & DEVELOPMENT
MEMBER, SUBCOMMITTEE ON INTELLIGENCE AND COUNTERTERRORISM

Congress of the United States
House of Representatives
Washington, DC 20515–3001

PLEASE REPLY TO:

☐ 2439 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-5801

☐ 506-A WHITE HORSE PIKE
HADDON HEIGHTS, NJ 08035
(856) 546-5100

☐ 83 NORTH BROAD STREET
WOODBURY, NJ 08096
(856) 848-3900

E-MAIL:
rob.andrews@mail.house.gov

July 29, 2009

Robert L. Van Antwerp, Lieutenant General
US Army Corps of Engineers
Headquaters, US Army Corps of Engineers
441 G. Street, NW
Washington, DC 20314-1000

Dear Lieutenant General Van Antwerp:

I would like to begin this letter by thanking the Army Corps of Engineers for selecting Gloucester Township to serve as the host of a new United States Army Reserve Training Center. Furthermore, I am glad to hear that the public comment period was extended for an additional thirty days so that the residents and township officials of Gloucester Township are given the opportunity to express their questions and concerns regarding the proposed Training Center.

Mayor Rau-Hatton and I are excited that a new Training Center will be constructed in Gloucester Township; however we share similar concerns. First, neither my respective office nor myself were informed beforehand of the proposed training center. A greater concern is that the Army Corps of Engineers isn't working with the local community. Mayor Rau-Hatton has proposed several alternative sites that could be used to accommodate the proposed Training Center. The current proposed site is strategically located for economic development and would be an invaluable loss to the citizens of Gloucester Township.

I urge you to work closely with Gloucester Township Officials so that all options are thoroughly reviewed. A project of this magnitude cannot be rushed. I am confident that a compromise can be reached and that the Training Center will become a valuable asset to Gloucester Township.

Should you have any questions, please do not hesitate to contact my aide, Mr. Thomas Woltjen at 515 Grove Street Suite 3C, Haddon Heights, N.J. 08035, (856) 546-5100, ext. 105, Fax (856) 546-9529, thomas.woltjen@mail.house.gov. Your time and cooperation in this matter is greatly appreciated.

Sincerely,

Robert E. A

Robert Andrews
Member of Congress

REA:tw

THIS STATIONERY PRINTED ON PAPER MADE OF RECYCLED FIBERS

Maureen Barra-Warner
813 Roosevelt Ave
Glendora NJ 08029

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Fax: 609.562.7983
Laura.dellolio@usar.army.mil

RE: 30-day public comment period for the BRAC Realignment Actions in Camden County, NJ

To whom it may concern:

I wish to oppose the construction of the proposed military facility on Cross Keys Road and would like to see such a facility built in a non-residential area. There are other non-residential, already tax-exempt properties that would offer a better fit for such a facility. The proposed facility would disrupt our neighborhood as well as depreciate our home values. We, the residents of Gloucester Township, do not want to hear drills and machinery during our weekend retreats in our backyards. We do not want our children's playground to be the backdrop for a parking lot or maintenance shop. Kindly look for an alternate site.

Thank you for taking the time to hear my voice.

Sincerely,

Maureen Barra-Warner

948 Kearsley Road
Erial, New Jersey 08081
July 22, 2009

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Email: laura.dellolio@usar.army.mil

RE:30-day public comment period for the BRAC Realignment Actions in Camden, NJ

To whom it may concern:

I am writing to express my concerns regarding the environmental assessment for the Construction of BRAC on Cross Keys Road (preferred site) after reviewing the 216 page Environmental Assessment. I am opposed to the building of the said facilities as you would be doing so in my backyard. Your maps (figures 3-2, 4-2, 4-7) are at least four years outdated and do not even show my home. My property, 948 Kearsley Road, Erial, runs along the AT&T easement and stands alone on Kearsley Road. I chose this property because of calm, suburban environment, lush forest (which is now half gone) and local attractions. I believe your facility will have significant impact on the surrounding suburban areas and will deteriorate the calm, neighborhood environment as well as insult home values. I believe your estimate of how the use/storage of 61 vehicles, 40 trailers and 400 personnel would not impact the area's setting, traffic and noise levels to be narrow and unrealistic. Regardless if all personnel are on site at the same time or not. Area residents and I do not agree that, and I quote *"proposed facility would "fit" visually with surrounding land uses."*

The construction of such a site would heavily impact an already congested and unattended length of Cross Keys Road that has been seemingly forgotten from a 4-lane expansion project that has been suspended for several years now. It is already impossible to make a left hand turn from the adjacent residential road, Kearsley Road, onto Cross Keys Road. Disrupting the flow of traffic with construction vehicles prior to the 4-lane expansion would most definitely interfere with traffic patterns in the area. I would like to be more specific to the following quote from the EA review, since we are getting technical here, *"There are some single family houses adjacent to the western boundary of the site. The nearest house, off Kenwyck Court, is approximately 90 feet from the site boundary."* There are exactly __single family homes adjacent to the western boundary of the site. Five of the homes on Kenwyck Court will be directly affected by the construction of the said facilities as well as my property which is adjacent to Kenwyck Court.

I have been a resident of Erial in Gloucester Township for 31 years and the proposed land was never used as farmland until its clearing in 2007. The previous owner of the land who still occupies the residence subject to demolition told area neighbors that he was farming the property until sold so that it may be labeled 'unable to produce'. For as long as I can remember, the property currently cleared was a thick, lush forest. Therefore, your identification of the acreage as farmland is somewhat misleading. The farm consisted of livestock, mainly pigs, on the other side of the previous owner's residence which is home subject to demolition.

I would like to add to section 4.81.2 Wildlife as my family and I enjoy the surrounding wildlife on a daily basis and again I believe would most certainly impact the surrounding wildlife. Besides the disruption of homes for the many birds listed in your report that have already been affected with the clearing of the land and the clearing that will ensue in the future, the property was and the surrounding properties are most definitely inhabited by white tailed deer, wild turkey, fox, box turtles, skunk, opossum, toads, bullfrogs, tree frogs, golden eagles, multiple species of snakes, and Cooper's hawk. My property is home to many frogs, box turtles, numerous worm snakes and black rat snakes, all seeking refuge from the clearing of the property in 2007. I fear further disruption of the wildlife would occur upon such major construction adjacent to the

property in question.

I question why the old Nike Base property is not a site of inquiry as it is closer to the business interests of Erial and to the AC Expressway. I would rather see your site at your alternative location as the area is not as densely populated as Gloucester Township. I believe you would have less of an impact here then in the multiple backyards of Gloucester Township residents.

Please accept this letter of opposition as well as the signature of my fellow residents who are also opposed to the proposed construction.

Sincerely,
Tina and Wayne Bridda-948 Kearsley Road, Erial, NJ 08081

Name of residents	Address	signature

-----Original Message-----
From: lisa cowne [mailto:lcowne@yahoo.com]
Sent: Tuesday, July 07, 2009 3:23 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Camden EA- AFRC / Implementation of BRAC 05

To Whom it May Concern:

I am responding to the letter I received yesterday, July 6, 2009. I am a resident of Kenwyck Ct., in the Erial section of Gloucester Township. My property is adjacent to the proposed site for your new facility.

I have been a homeowner here for over 32 years. During that time it was a peaceful place with the exception of a "junk yard" that was in operation directly behind me for about a year. That land was filled with junk cars, mountains of tires, barrels, metal, etc. You name it, it was there. Finally, the junkyard was put out of operation and after pleading with the mayor, the old cars were removed.

In the summer of 2007 the 11 acres that you are considering became what was like a "war zone" for the residents of Kenwyck Ct. What was a setting of quiet woods and animal life, became an area of trees being ripped up, 4-5 at a time and tossed aside as the wildlife scurried for shelter. You could actually see squirrels flying out of trees! The summer was filled with noise, constant noise and destruction. When all quieted down, a lone tree stood in the middle of the field. The residents of Kenwyck Ct. were devastated. The woods that our children played in and the one place of solace was gone. This was NOT an area of farmland where crops were grown. The farmer raised pigs for as long as I have been here and the rest was a forest that protected our homes from the noise and pollution of the very busy road called Cross- Keys Rd.

Our homes have very different environments now. Our properties are no longer shaded and the change has affected the plant life around us. Our landscaping that was purchased and nurtured for partly sunny is now incorrect for the said environment. The noise from the road that was never heard is loud and headlights shine into the windows. Kearsley Rd. is already difficult to exit onto Cross Keys Rd. One could wait 10 minutes to pull out and there are many accidents or close calls all the time.

I fail to understand how it can be said there will be no effect or no significant effect from noise, pollution, aesthetics, etc. We USE our backyards and weekends filled with Army training does not sound like pleasant weekend gatherings. The wildlife is already invading our yards, and can you blame them? They have no place to go. My pool was covered with birds due to a lack of a better place! Vehicles, whether personal or Army owned, add pollution and noise to the area. Aesthetically, there is a drastic effect on the residents of Kenwyck Ct. We used to have a beautiful forest,now a barren field, and to top it off, you want to put buildings and lots of paving and vehicles. How can you say that has no effect!!!

The ground water will be effected and I'm sure that there will be a change in our neighborhood. We have already had flooding issues recently. Every time more paving is added, the water and run off is drastically effected, many times into our basements! The mosquito issue has become worsened since the forest has been destroyed. What will happen when you take away the field?

Construction and ground rumblings by equipment will surely affect our wells, many of which have been replaced since the originals. The pollutants from the construction and then the facility can run into our underground water source.

On top of all of this, we surely do not want the "terrorist" potential close to our homes. Given the fact that you feel the need to provide protection for this, why would we want to have that added worry? Fort Dix is a prime example of targeting!

If a facility already exists, fix it, spend the money there. Don't add to an already over built area. The last thing we need is a facility of this type near our Technical School that children attend, an elementary school about 2 miles away, and homes full of families that bought these homes hoping to have quiet and safe havens. Property values have declined. What will happen to ours with this facility in our backyards???????????????

You wanted comments and concerns, these are just the beginning. I am appalled at the consideration of this site and disgusted with the higher ups in the county and Army that would even think that this was appealing. Would you like it in your backyard?

Sincerely disgusted,
Lisa Cowne

-----Original Message-----
From: lisa cowne [mailto:lcowne@yahoo.com]
Sent: Monday, July 13, 2009 12:38 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: adverse effects

"Based on the EA, it has been determined that implementation of the Proposed Action will have no significant direct,

indirect, or cumulative adverse effects on the quality of the natural or human environment. Because no significant

environmental impacts will result from implementation of the Proposed Action, an Environmental Impact Statement

is not required and will not be prepared."

This is surely not correct! no adverse effects on the quality of human environment? Did you ask us?

-----Original Message-----
From: lisa cowne [mailto:lcowne@yahoo.com]
Sent: Monday, July 20, 2009 7:51 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: & Nash Freeholders Greco, Leonard
Subject: proposed AFRC site

To Whom it May Concern,

I would like to invite you to visit our little community that is about to be disrupted, uprooted, and totally de-valued as viable properties to own. This will be caused by the proposed AFRC to be located at 389 Cross Keys Rd., Erial, NJ. There are many sites throughout Camden County that could be considered without causing so much harm. These would include property 16096643/2348 Rt. 70W, 15530930/11 Perina Blvd., 15772558/3905 River Rd., 15887456/7001 North Park Dr., 14830213/614 Hampton Rd. These were all found on www.loopnet.com <http://www.loopnet.com/> .

It seems that the Army has made no analysis of energy costs of the life cycle of the project vs. refitting existing buildings.

We are very distraught and ask that you look into this matter.

Thank you.

Carpe Diem! Now is the time to drink. Now is the time to dance footloose on the Earth.

-----Original Message-----
From: lisa cowne [mailto:lcowne@yahoo.com]
Sent: Tuesday, August 25, 2009 7:24 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-; Camden County Freeholder
Cc: Cindy Rau-Hatton
Subject: another meeting?

Will there be another meeting held to let the community know the outcome of the decision made on the proposed AFRC site in Gloucester Township? How will we be notified?
Lisa Cowne

Carpe Diem! Now is the time to drink. Now is the time to dance footloose on the Earth.

~~RDC~~ ?
PDR

I have been a taxpaying resident of Gloucester Township for 32 years and have lived at 7 Kenwyck Ct. in Erial for those same 32 years. I spent 10 years of my childhood living in Gloucester Township. I watched the Nike base in operation and then close, watched Cross Keys Rd. go from a crowned road surrounded by farmland to a piecemeal 4-lane road. In those years I have also seen many other changes in the Township, some beneficial, some not, depending on your perspective. The reaction to the proposed AFRC to be built basically in my backyard is definitely my perspective. However, my point of view is not without concern for my fellow township residents. We as taxpayers will be losing our voice in governing what is around us, losing tax revenues that would benefit our families, and who's to say, at some point, losing our homes.

Due to the extent of information, and may I say, a lot of misinformation, in the **BRAC EA** report, I will reference items and respond in this letter. Since I have taken the time to read the report more than once, I would appreciate it if you took the same time to read my rebuttal. In advance, thank you for your time and consideration.

The first problem that has since been rectified is the fact that the EA was not available in hardcopy in our local Library and the residents didn't know about it. I reference **1.4 Public Participation and Involvement**. Only we chosen few within 200 feet of the proposed site were actually notified by a letter delivered by the USPS. One would think that something of such great importance would have come certified, making sure that the residents received it. At that same time, our mayor was notified as stated in the report. How can the US government choose a site without discussing it with the local government? Bringing in people from another state that do not understand how the government breakdown in Southern NJ works is just asking for problems. For instance, the EA references finding a new **site in Camden, NJ, there is a very big difference between Camden** and Camden County. I digress… as I said, this has been rectified and the comment time has been extended due to the work of our mayor and others.

In **ES.5** it states *" the site (389 Cross Keys Rd.) consists of approximately 11 acres of vacant agricultural land which has been used in the past for crops and livestock."* This is not the case. It was wooded acreage that was cleared in the summer of 2007. There were no crops or roaming livestock. There were penned pigs. The pig farmer sold out and then the woods were destroyed, literally. We spent a summer hearing complete destruction, watching as 4-5 trees were ripped up at a time, tossed, chipped, and hauled away. When the dust settled, one tree was left standing in the middle as if it were pastureland for animals. We were left with dirt, heat, noise, car lights, and worry.

Also in **ES.5** I find it ironic that it states *"the site also provides good exposure to the public, which is beneficial for recruiting purposes."* This bothers me as a teacher of young children. The site would be built right next to our Vo-Tech School (county run and tax exempt) where there are students who will be prime targets for recruitment. In an economy such as ours is today, this will be morally wrong. I am not blind to think that these young people will not be enticed by such opportunities and will enter into something that they haven't given long term thought. In saying this, I have nothing against the military and believe that it

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is a fantastic opportunity for **some. However, many of the young people who attend the Vo-Tech school are not white collar, but blue collar. These are people learning skills and not going onto college. What better recruits?** **Section 4.2.2.2** states "*Impacts on land use on the site are expected to be limited in scope to the site itself.*" This statement is appalling! The impact will definitely **not** be limited to the site. The Army Corps Of Engineers has obviously not spent much time at the site. **Depending on the reports of others that are not current is asking for disaster**.

This section also discusses **Current and Future Development in the Region of Influence.** At a meeting on Aug. 17, 2009 that was hosted by the Army Corp they said that this project would bring jobs and business to the community. In **Section 4.2.2.2** it states that will **not happen**. This is a direct contradiction. It says the personnel and construction in the ROI would add minimal financial capital to the local and regional economy.

Section 4.3.2.2 "*Implementing the Proposed Action at the preferred alternative site would have not have a significant effect on aesthetics and visual resources.*" Obviously the person who made this statement doesn't live here. Presently we are looking at a field that once was woods. Woods… thick enough for children to play and hide, a place of solace for some, a home to wildlife and plants. In fact, on my property there stands a Black Walnut Tree, something of a treasure. There were probably others, in the woods. Aesthetically, the present owner has already violated us. Could the Army really make this statement in good conscience? We are not just discussing some nice "campus like buildings" here. We are speaking of 61 military vehicles and 40, yes, 40 trailers. We will be seeing THOSE every day. Living in a home that is 2 stories high and being able to see directly into the site tells me **that** is the "aesthetics" I will have. There are no trees that will grow fast enough in my lifetime or ever, that will block the view. There are no **(Section 4.3.2.2)** *"existing stands of trees which bound the project site to* the west" except what I have planted in my own yard. It also states *"additional landscaping, IF INCORPORATED INTO THE FINAL DESIGN would also help to lessen any visual impact that may occur"*. What guarantee is that to us as homeowners looking into the site area?

Section 4.4.1.2 The numbers seem to be incorrectly stated. The average yearly temperature in Camden County is 69 degrees F. with an average high of 89 degrees F. in July and an average low of 51.1 degrees F. in January. The section states, *" The average high temperature in Camden County, which includes the project sites, is 65 degrees F."* There is a definite difference between average high and yearly average. I bring this point to the forefront since I fall into the category of the sensitive group pertaining to unhealthy air quality. There are also other neighbors in close proximity to the site who fall into this category. Days that are filled with emissions from demolition, construction, and future operational phases will directly affect us. Are we to be held captives in our homes in order to have clean air to breathe?

Section 4.5 Noise is defined here as unwanted sound. There will be no ambient noise that will not distress us. There are many in our neighborhood of working class people who SLEEP during the day due to shift work. How are they

supposedly not going to be affected? *"Noise interferes with normal activities such as ...sleep"*. **Section 4.5.1.4** discusses traffic noise from the facility. We already hear the traffic on Cross Keys Rd. as if it were in our yard. We hear the train in Albion (2 miles away) as if it were coming down our street. This is all since the owner took down the woods. How can you say that the added vehicular traffic will have no impact?

Section 4.5.2 Noise levels will exceed natural sounds.

Section 4.5.2.2 We **use** our backyards on weekends. Many of us have created "safe havens" for our families and have spent a lot of time, effort, and hard earned dollars to do so. Are we supposed to be housebound now in order to still have that atmosphere? OR are we supposed to listen to engines starting and vehicles moving all weekend long. The routine maintenance that is referred to is more than just a tire check and oil check. There are no emissions from that type of maintenance. Running diesel engines all day long creates emissions.

Section 4.6.2.2 This section states *"Soils found within the footprints of the proposed new construction would likely be affected by activities associated with the overall preparation and minor leveling and grading of the site... Disturbed areas outside of the building and parking facility footprints would be reseeded..."* Again, the people who are making these statements have not spent any time in the area. There is much runoff and there have been many difficulties incurred due to increased paved areas, poor drainage, construction poorly completed, and lack of funds to correct problems. Many in our neighborhood have had water problems in basements that have cost thousands of dollars to fix. There are quite a few who have had to create French drains around their homes to take water away. Places where the sewer lines were added have caved in on the roads. The more paving, the less vegetation, the more erosion and problems for the people outside of the site. We cannot afford any more problems! **Section 4.7.1.1** states *"no known drainage concerns were noted"* Did you ask us?

Section 4.7.1.2 This section discusses the Kirkwood-Cohansey aquifer system and how it is not confined. It also discusses how 75 percent of the freshwater supply in the NJ Coastal Plain is from groundwater. We who live on Kenwyck Ct. have our own wells. The groundwater is from the Kirkwood-Cohansey aquifer. According to the report cited in this section, the groundwater is anticipated to be encountered at a depth of 5-9 feet below ground surface. This will directly affect our drinking water supply. We LIKE our well water and DO NOT want to connect into the city water lines. **In fact, it has not been offered nor can many of us AFFORD to do so**. The **Safe Drinking Water Act** is mentioned and that *"the construction, demolition, and operation of facilities on the site would continue to adhere to existing applicable groundwater protection protocols..."* **Are we to put faith in this? We are the section of the state that has had to deal with one of the worst landfills in the NATION- GEMS! To date, that problem is still not completely solved**.

Section 4.7.2.2 *states that no specific storm water management measures for the PA have yet been designed...the proposed OMS design would LIKELY include floor drains...minimizing the likelihood of pollutants entering the storm water."* I find it strange that so many things have been laid out in detail but this

important matter has not been addressed. It directly affects the neighborhoods surrounding the site. AND if affects the roadway that is already prone to flooding. We are already plagued with mosquitoes, not just at dusk but also during the daytime hours.
The section goes on to speak of possible small leaks and spills… things happen! Oil tankers are not supposed to leak either.

Section 4.8.2.2 *"efforts will be made to preserve a few of the particularly large trees, if site preparation and construction can occur without causing damage"* How many more trees would come down? In the middle of the field there is only one large oak tree remaining. As far as the statement that *"no significant adverse effects would be expected as a result pertaining to the wildlife…"* There already are adverse effects since the destruction of the woods. They are now in our yards, in our homes, in our gardens, and in our pools. On a daily basis we have creatures that used to have homes trying to find new ones. Why would you add to their distress? Comments were made that no redheaded woodpecker was seen. Of course they can come on demand, right?? We have seen them, our neighbor had nest near their home, and we just didn't have the camera out at the right time.

Section 4.9.2.2 discusses the prehistoric artifacts that were found. They warranted registration with the NJ State Museum. Possibly if more time were spent, more would be found. I realize that many shovel tests were done. The owner and his destruction quite possibly have already compromised this property. I'm sure he didn't even look.

Section 4.10.1 states *"due to the fact all the personnel relocating to the proposed AFRC would not be moving to the area only a brief overview of the regional economic activity and demographic data and trends is presented."* I again refer to the statements made at the Aug. 17th meeting saying that this will bring jobs to the area and the military will frequent our restaurants and hotels. We have no hotels and there is a kitchen and dining hall at the proposed facility. This is again a contradiction. Can we be assured that not one military family would be moving to be closer to the facility? Not one child will attend our overcrowded schools? It will be fine, from the Army's point, to add a giant footprint and not give back to the community? We already host other tax-exempt sites and don't need more. What do we have to gain? Our homes are at stake. Many people are out of work, are on the brink of losing their homes, or are hanging on by fingernails and the kindness of others. Presently our homes are being re-assessed by the township for tax purposes. What will happen to those of us whose homes abut the site? Our homes will be worth less than they are now. They presently have already declined in value at approximately 40%. What will they be worth when the Army comes in? We will be stuck in real estate that is virtually worthless as are the homes in front of the GEMS landfill. Yet, **Section 4.10.2.2.3** states no effects would be expected.

Section 4.10.1.4 discusses the protection of children from environmental health risks and safety risks. As a teacher I see the effects of the environment on the health and well being of children on a day-to-day basis. Children's health is not only physical but also mental and emotional. Let me address the demolition

and construction first. This will put into the air, for a period of about 2 years, emissions, other pollutants such as lead, dust, and chemicals. The children living in the area and the children at the elementary schools will be directly affected. Children play outdoors unless it is under 32 degrees F. during recess times. The new air systems draw in outside air and we can tell you if they are cutting the grass, so obviously, the systems don't filter very well. We already have had mold issues to deal with and water problems. Safety Risks—Cross Keys Rd. is a highly traveled road and our school buses are on them regularly, even on weekends. The change over to a four-lane thoroughfare is a very slow process and we have had to deal with it for years. The traffic is bottlenecked on a regular basis. We risk our own lives and those of our families as we try to maneuver the intersection of Cross Keys and Kearsley Rds. The expansion is noted as SCHEDULED. The fact that it will be a military installation will affect children who are old enough to remember 9-11. Many of those children still suffer the effects and worry when they see anything they perceive as a threat. Kearsley Rd. has become a major thoroughfare from Cross Keys Rd. to Blackwood Clementon Rd. There is constant traffic on the road, even late at night. The children can't ride their bikes on the road, can't safely travel to their friends' homes, and can't even go to the local Walgreens or convenience store to buy a snack. Parents must drive their children everywhere. The small park at the end of our court has become an open area to the traffic and anyone who would like to prey upon young children. The basketball court is right out in the open along with the climbing bars. Swings have been removed along with the fence.

Section 4.10.2.2.1 Again we have a contradiction. In this section it is stated, *"the proposed action will generate an estimated 93 direct and 238 induced jobs for a total of 331 jobs created within the ROI"* I refer you back **to Section 4.2.2.2.**

Section 4.11.1.1 states, " *No speed limit is posted for this section of Cross Keys Rd."* The speed limit is 45 mph on Cross Keys Rd. In the state, if a road is not posted and it isn't residential, the limit is 50mph. Kearsley Rd. is 35mph. Accidents occur on a regular basis. Left turns onto Kearsley Rd. cause backups all the way to Erial-New Brooklyn Rd. This intersection is only a "stone's throw" from the proposed site. Cars trying to exit Kearsley Rd. by making a left onto Cross Keys Rd. either take chances or sit and wait for 10-15 minutes. This is weekdays and weekends. At times, it is easier to go right and then turn around. The cars double up at the intersection, battling to make right turns instead of waiting for those making a left, thus blocking the left turn driver's view.

Section 4.11.1.2 states "*no significant effects on traffic would be expected during the construction of the proposed facility as long as the same number of travel lanes are maintained for the duration of the construction...using barriers, cones, arrow boards, police, flag men, etc. to direct traffic".* **I can state right here that I am a handicapped person today due to this wonderful system in a busy area.** How can this have no significant effect on the traffic, on an extremely busy road, at all hours of the day and night? The estimated trips of entering or exiting the site after completion as shown by **table 4-14** shows a total of 15 in and the out during the weekday peak hours and on the weekends, 122 and 135 in and

out. That makes for a total of 287trips either in or out on a regular basis. Cross Keys Rd. is already in ill repair. Between the heavy loads that are carried by demolition and construction and then the vehicles in and out after completion, an already taxed road will be even worse. It is filled with potholes, patches, and more patches. It is poorly maintained during bad weather and has poor drainage. Numerous times it is flooded.

Section 4.12.1.1 Are the sewer lines and services responsible for carrying away the maintenance wastes? They are pollutants. Nowhere is it stated that a special system will have to be installed. The fact that it has to be across Cross Keys Rd. adds to the traffic situation and the poor road surfaces that follow.

Section 4.12.2 Our potable water supply will be compromised by this proposal. Those of us on Kenwyck Ct. have well water. Many of us, in the past, have had to have new wells drilled due to cave-ins or sand in the wells. The constant rumblings of demolition, construction, and then operations will surely compromise our systems. I find it offensive to think that this is of little significance to the Army as water is essential to life.

Section 4.13.1.3 site contamination cleanup. How will the transformer adjacent to the site, if it contains PCB be handled? Are you aware that at one time the vacant area was host to an operating junkyard? Host to dumping of vehicles, tires, building supplies, appliances, chemicals, feral cats and stray dogs? We had tire mountain fires and most of the vehicles were hauled away by the township after much pleading on our part. Are you aware that the pig farmer gathered garbage from the local schools to feed his pigs? What kind of chemicals is in the ground due to old appliances, including refrigerators and Freon? Do the research! Why is it stated, *"Some negligible long-term adverse effects would be expected from the very minimal increase in use of hazardous materials and wasted generated by the proposed facilities"?* What type of long- term adverse effects? Who needs more? The children?

Section 4.14.2 Again, discussion on the construction and Cross Keys Rd. improvement. How can it be said that if the 2 projects overlap, that it will have no adverse impact? This is not MINOR!

Section 5.2 Conclusion states, *" based on the analysis performed in this EA, implementation of the Proposed Action at the Preferred Alternative Site would have not significant direct, indirect, or cumulative effects on the quality of the natural or human environment."*

I am offended, appalled, disgusted, and ashamed of my government if the statements in this EA are their beliefs. We are voting citizens, have the right to live in a clean, healthy environment, and according to our constitution, the right to petition the government for a redress of grievances. It is also stated in the Preamble " to insure domestic tranquility and promote general welfare".

We feel that our military should be trained and cared for properly and are deserving of such. However, if our jobs put such distress on a community, I would hope that we would be held accountable. I know that in my job, I am accountable on a daily basis. That being stated, we are asking that another more suitable site be chosen, one that is going to be more positive for all involved. One that will not be resented and continually cause grief for all.

Sincerely,

Lisa C Cowne
7 Kenwyck Ct.
Erial, NJ 08081-9713

7 Kenwyck Ct.
Erial, NJ 08081
Aug. 28, 2009

Re: AFRC proposed on Cross Keys Rd. in Erial, NJ

To Whom It May Concern:

We would like to offer comments regarding the proposed AFRC proposed for Cross Keys Rd. This site is located in the backyard of the home we have raised our children in, put blood, sweat, tears, and dollars into, and considered an investment for my future. As home values decline, we cannot refinance nor can we sell our property. If this site is chosen we will NEVER be able to sell our home for a profit nor will we reap the benefits of a tax ratable property that could actually lower our taxes. We have some of the highest in the entire U.S.

While we have the utmost respect and support for our men and women in the armed forces, we feel this facility would be better suited elsewhere. There will be no benefits for the residents of the neighborhood or the community. Given that fact, there will also be discontent as we are forced to have our lifestyles changed and disrupted. Discontent as we spend more money trying to shield our homes from the demolition, construction, and operations of such a facility. Where are we supposed to find the extra dollars to put into such necessities? One large tree that is fast growing and non-deciduous is at least $100! There is virtually no way to really block the view from our windows. The view of 61 vehicles and 40 trailers. We will not be looking at the campus like building. We will have years of dirt, dust, noise, and other pollutants.

The selection of the training center site was made without the consultation of our local officials who could have steered the Army Corps of Engineers in a direction of better-suited properties. These properties would have been chosen with the community in mind, taxes, and environment, not to say anything about the impact on traffic.

At this point in time, we as residents are aware that a deadline has to be met and that an extension is needed to find another site. Please take that into consideration, meet with the officials of Gloucester Township, and make a better choice for all involved.

Sincerely,

Lisa and Michael Cowne

July 31, 2009

To: Laura Dell'Olio
NEPA Specialist, 99th RSC
5231 South Scott Plaza
Fort Dix, NJ 08640

Dear Ms. Dell'Olio

I would like to take the time to comment on the proposed Armed Forces Reserve Center on Cross Keys Road in Gloucester Township. As a resident of Gloucester Township and Cobblestone Farms, I would think we to need to clean up the South side of Sicklerville and work on making our neighborhoods safe and clean, instead of bringing more traffic to our community.

My neighbors and I pay more than $10,000 in property taxes and are quite troubled by the eye sore along Sicklerville and Jarvis Roads.

We need resources that would pay for regular street clean-ups and to purchase new consistent fences that would stretch the length of Sicklerville and Berlin Cross Keys road. These new fences would block the bad conditions of the row homes that begin after Terrestria. The fences could pick up past Cobblestone Farms near the row homes just before the CVS at Sicklerville and Berlin Cross Keys road. There are fences up now, but please take a drive out there and see that they are in horrible condition.

If an armed forces reserve center is built in our town, what resources will you give back to our community? We need to improve the look of Sicklerville and I don't think housing an armed forces reserve is the answer to beautifying our area! Curb appeal is so important! We live in a climate where there are several foreclosed homes and prospective buyers are driving through an area that looks decrepit and run down. I can tell you that some of my neighbors are trying to move to areas like Washington Township, Mullica Hill and Haddon Field because they are not pleased with some of the living conditions in the southern section of Gloucester Township. But, there are plenty of folks like myself who want to stay and make sure that the values of our homes are maintained.

Please take my suggestions in consideration! I appreciate the opportunity to address my concerns. If you have any further questions, please feel free to reach me at 856-357-5225!

Sincerely,

M. Paulette Crawford

State of New Jersey

Jon S. Corzine
Governor

Department of Environmental Protection

Mark N. Mauriello
Commissioner

Division of Fish and Wildlife
P.O. Box 400
Trenton, NJ 08625-0400
Dave Chanda, Director

Laura Dell'Olio,
Environmental /NEPA Specialist,
Innovar Environmental Inc., supporting,
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640

Dear Ms. Dell'Olio,

This serves to inform you of the NJ Division of Fish and Wildlife's [DFW] comments about the DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI) - CONSTRUCTION OF AN ARMED FORCES RESERVE CENTER ANDIMPLEMENTATION OF BRAC 05 REALIGNMENT ACTIONS IN CAMDEN, NEW JERSEY.
The DFW has the area found at 389 Cross Keys Road in Gloucester Township, Camden County, NJ. (Preferred Alternative) mapped for the State listed T/E species, Coopers Hawk, and Species of Concern, Eastern Box Turtle, Eastern King Snake and Great Blur Heron. The DFW would request GIS shape (.shp) files of the area or areas expected to be impacted in order to agree or disagree with the Draft FONSI.

We hope these comments are of service to you.

Sincerely,

Kelly Davis, Office of Environmental Review
NJ Division of Fish and Wildlife

Kelly Davis, Ast. Biologist - Fisheries
N.J. Division of Fish and Wildlife - Office of Env. Review
P.O. Box 394, 1255 County Rt. 629
Lebanon, NJ 08833
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kelly.davis@dep.state.nj.us

-----Original Message-----
From: Linda DeWitt [mailto:ldewitt19@yahoo.com]
Sent: Tuesday, August 18, 2009 4:11 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: Linda DeWitt
Subject: Army Reserve Plans

I live in the middle of this proposed project.Iwas not thrilled at first,but I would rather see the army reserve there than ashopping center. I was at the meeting on Aug. 17 in Gloucester Twp., alot of people complained about the traffic on Cross Keys Rd. It is true about the traffic, but I think we would have a lot more traffic with a shopping center there. That would be traffic seven days a week not just the weekends. My only concerns would be about my well water and drainage. Ido not get any water in my yard now, so I just hope I don't get any. I would also like to know where the fence would be located near myproperty line? I am the only one who has trees left behind my house when they cut the woods down. It would be nice to keep those six trees behind my house, they're not on my property,but it would be great if they could stay! I just wanted you to know that I would rather be a neighbor to you than a shopping center!!!

Gloucester Township
Economic Development Corporation

Laura Dell'Olio
Environmental / NEPA Specialist
Innovar Environmental Inc. Supporting,
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640

RE: US Army Training Center Project

Dear Ms. Laura Dell'Olio

I respectfully submit the following comments relating to the above referenced Project:

I have thoroughly researched the specifics on this project, and I desire to speak directly to the appropriateness of the proposed site chosen by US Army for a Reserve Center in Gloucester Township, New Jersey.

I am a long time Board Member and Corporate Officer of the Gloucester Township Economic Development Corp. (EDC). I am also seriously aware of the Government's sincere efforts at this time to efficiently control the spending of taxpayer's dollars.

The EDC is sincerely directing its efforts to stream line all of our operations. The Township of Gloucester is under pressure to eliminate excess, redistribute duties, delay hiring and basically endeavor to get more productivity with fewer resources, every year.

In an effort to efficiently maintain taxes as low as possible the Township and EDC has re-doubled our combined efforts to make the most of every piece of Master Plan commercially zoned property in the Township.

For this reason it would be irresponsible for public and corporate officials of Gloucester Township not to make every effort to select the **highest and best** use possible for every piece of property carefully identified for development.

I earnestly support the premise that the Federal Government **must** also reflect the same important goals:

1.) To manage growth to produce the least tax burden for the citizens of the Township.
2.) Intelligently guiding Highway Commercial development by choosing property for projects that have the least negative impact on local community, governments and area economies.
3.) To NOT support a flawed Public Process.

There for I am wholly opposed to the Army selecting land designated for Highway Commercial or Industrial use as the site of the proposed Training Center.

I recommend that the Army seriously consider working with the EDC to develop the project on Tax Exempt properties in the Township.

I would be glad to work with you and support the development of approved Tax Exempt property that meets and/or exceeds your strict requirements for a successful project.

Sincerely

Frederick S. Doolittle, Board Secretary

-----Original Message-----
From: Kim Forte [mailto:forteearlady@verizon.net]
Sent: Sunday, August 30, 2009 5:10 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Army Reserve Center

To: Laura Dell'Olio

Environmental / NEPA Specialist

Innovar Environmental Inc. Supporting

From: James J, Forte, Vice-President

Gloucester Township Economic Development Corp.

As a U.S. Army Veteran during the Vietnam War and Vic-President of the Gloucester Township Economic Development Corporation, Chairman of the

Gloucester Township Chamber of Commerce and retired Gloucester Township Planning Board Vice-Chairman, I welcome the U. S. Army Training Project to our Township.

The 10.8 acre site which you are considering for the Army Reserve Center Project is currently zoned for Highway Commercial development and is located in an active commercial growth corridor along busy Cross Keys - Berlin Road. This site is better suited for Retail Commercial Use which would provide a much needed Tax Revenue source for the Township during this current Major National Recession providing employment for our community.

The selection process needs to be consistent with the Township Master Plan which includes other sites already designated as Tax Exempt. The Gloucester Township Economic Development Corporation would be glad to work in conjunction with the Army in the selection process of a Tax Exempt Site.

-----Original Message-----
From: racerqueen3@comcast.net [mailto:racerqueen3@comcast.net]
Sent: Tuesday, July 28, 2009 7:02 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Army Reserve Center

Dear Laura,

I live in Gloucester Twp. and I am puzzled by the selection of the site on Cross Keys Road for the building of the Reserve center. There are several open areas, including the former Nike base on New Freedom Road, that would be better suited as they would not be backing up to someones yard.

I live on Kearsley Road and would only be bothered with the added traffic which doubles when the area schools are in session.

Please don't misconstrue my message, I am not against the center, I just believe there are more suitable sites.

Thank you,

Sandi frehmel-Heim

"Dear God, please make me the person my dog thinks I am."

"If we ever forget that we're one nation under God, Then we will be a nation gone under." - Ronald Reagan

Saving one dog will not change the world...but surely for that one dog, the world will change forever!

They say it takes only a second to find a special dog, an hour to get to know him and a lifetime to forget him.

He is your friend, your partner, your defender, your dog. You are his life, his love, his leader. He will be yours, faithful and true. To the last beat of his heart. You owe it to him to be worthy of such devotion.

JOSEPH GALLAGHER Jr., MPA
TOWNSHIP ADMINISTRATOR

August 24, 2009

Kevin L. Jasper, P.E.
US Army Corps of Engineers
P.O. Box 59
Louisville, Ky 40201-0059

RE: Army Reserve and National Guard Training Center Proposed on Erial Road

Dear Mr. Jasper:

In my capacity as Winslow Township Administrator, and on behalf of the Winslow Township Governing Body, we would like to offer a few comments regarding the proposed Army Reserve and National Guard Training Center on Erial Road in Winslow Township.

As a follow up to our meeting and several prior conversations, please allow me to re-state Winslow Township's position. We certainly welcome an Army Reserve and National Guard Training Center, as well as expressing our utmost respect and support for our men and women in the United States Military. However, as you know, we also have an obligation to the residents and tax payers of Winslow Township to ensure that any planning and development clearly benefits Winslow Township.

MUNICIPAL COMPLEX 125 South Route 73, Braddock, NJ 08037-9422
Telephone: (609) 567-0700 Facsimile: (609) 567-0500

Our primary concern and a very serious concern, is the process in which the site selection for the training center had taken place. As you are aware, the local officials in Gloucester Township and Winslow Township were never contacted, nor were they ever consulted regarding their input for the site selection for the training facility. The training facility would be a wonderful asset for our Township, however; there are several key issues that were never considered. There are environmental concerns, sewer issues, and the project is tax exempt and being inserted into a commercially zoned area, therefore the township would be losing another tax ratable.

Furthermore, if we were consulted prior to the site selection process, we would have identified sites that are currently available with no environmental concerns, not zoned commercial, and currently tax exempt. It would be a "win-win" for both the Army Corps of Engineers and Winslow Township.

Secondly, the residents surrounding the proposed site were never notified prior to the current studies, and the issuing of the environmental impact report identifying the Cross-Keys Road site being the priority site in Gloucester Township and the Erial Road location being the alternate site. If the local officials were contacted, the site on Erial Road may have been eliminated immediately. The environmental concerns including possible wetlands issues on the property, and the lack of sewer capacity because of a sewer moratorium, should be a clear indication that another site should be considered. Contained within the environmental impact report it cites that there is public sewer, when in fact there is no sewer connection at the property, and the sewer capacity is not currently available.

I think we all agree at this point in the process that it is imperative that all interested parties are invited into the initial planning phase to ensure that; one, the training facility is built in a safe and secure area, and two, it is built in an area that addresses the concerns of the local community.

I would respectfully ask at this time the Army Corps of Engineers reconsider their site selection and meet with the local officials of Winslow Township or Gloucester Township, so we can assist in the process in selecting the best site for the proposed training facility.

I would like to make this a matter of official record for public comment submitted prior to the deadline date of August 30, 2009.

Thank you very much for your cooperation.

If you should have any questions, please contact me at (609) 567-0700.

Respectfully,

Joseph Gallagher, MPA
Township Administrator

JG/aq

cc: Honorable Mayor and Township Committee
Debbie Puchakjian, Municipal Clerk
Congressman Robert Andrews, First District of New Jersey
Mayor Cindy Rau Hatton, Gloucester Township
Sandy Kelly, Camden County Improvement Authority

T:\Annette\Army Reserve and National Guard Proposed Site.doc

-----Original Message-----
From: hawnnl@aol.com [mailto:hawnnl@aol.com]
Sent: Monday, August 17, 2009 12:50 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Army Reserve Center on Berlin-Cross Keys Road

Dear Mr. Dellolio:

I am a 31 year resident of Gloucester Township, and I have serious concerns about the location of this Center. In addition to the significant environmental impact and home value considerations, I would like to know what plan the U.S. Army has in place to handle the potential terrorist situation, such as the one the Maguire Air Force base experienced.

Please be prepared, along with the Gloucester Township Police, the Winslow Township Police and the Camden County Sheriff's office, as well as any other appropriate law enforcement people, to give a detailed plan at the meeting scheduled for tonight in Gloucester Township.

I look forward to hearing your plan,

Nancy Hawn
2697 Garwood Road
Erial, NJ 08081

-----Original Message-----
From: denisehorgan@comcast.net [mailto:denisehorgan@comcast.net]
Sent: Monday, July 13, 2009 8:40 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Construction of Armed Forces Reserve Center in Sicklerville, New Jersey

Ms. Laura Dell'Olio;

I am writing in regards to the construction of an ARmed Forces Reserve at 389 Berlin Road Sicklerville, NJ. This is a residential area which is next to my home it has been farm land for crops and animals for many years. I am very much opposed to the construction of this site. I have well water and am raising my family in this home which in this residential area many other families reside. The area already has had the trees removed which has displaced the wild life needless to say the chopping down of trees. This is a quiet neighorhood and this is no place for this site. Constuct this in an area which is not next to family dwellings. My family's health and well being depends on this site not being built here. Please do not do this.

Thank you,

Denise, Timmy, Nicole, April, Melanie and Franny Horgan

Kandee Dias
12 Killington Cr
Erial NJ 08081

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Fax: 609.562.7983
Laura.dellolio@usar.army.mil

RE: 30-day public comment period for the BRAC Realignment Actions in Camden County, NJ

To whom it may concern:

I wish to oppose the construction of the proposed military facility on Cross Keys Road and would like to see such a facility built in a non-residential area. There are other non-residential, already tax-exempt properties that would offer a better fit for such a facility. The proposed facility would disrupt our neighborhood as well as depreciate our home values. We, the residents of Gloucester Township, do not want to hear drills and machinery during our weekend retreats in our backyards. We do not want our children's playground to be the backdrop for a parking lot or maintenance shop. Kindly look for an alternate site.

Thank you for taking the time to hear my voice.

Sincerely,

Kandee Dias

-----Original Message-----
From: JAMES KIBELSTIS [mailto:kibelstj@verizon.net]
Sent: Wednesday, August 12, 2009 3:46 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: Harry Eden; George Brown
Subject: BRAC- Camden County, NJ

Hello Ms. Dellolio

I have the following questions concerning the location for the new military training base to be located at 389 Cross Keys Road - Gloucester Township New Jersey.

1. Will the local fire districts personnel require special training related to the materials being stored at this facility? For example hazardous materials, explosives, etc.

2. How many fire hydrants will be located within the boundaries of the location?

3. Will the facility be subject to fire inspections by the local fire district?

Thank you,

James R. Kibelstis
81 Shelly St.
Sicklerville, NJ 08081

-----Original Message-----
From: deana55@verizon.net [mailto:deana55@verizon.net]
Sent: Tuesday, July 28, 2009 10:41 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: deana55@verizon.net
Subject: Construction of an Armed Forces Reserve Center in Camden, NJ

Dear Ms. Dell'Olio:

Pursuant to your letter supplied by the Louis Berger Group, I am writing you so you may know my views of the proposed Armed Forces Reserve Center. After speaking with several of my neighbors, I don't understand why all the residents in the area of the proposed site did not receive the letter from Louis Berger Group. Our mayor provided a copy of the letter to all the residents near the proposed site. I also do not understand why this letter is dated June 30, 2009, when this proposed construction has been in the planning stage since 2005. It takes the government more than four years to get to this point in the construction but the residents in the area have a 30-day public comment period. I am a taxpayer and we are the people that should be represented by the government. I believe people in government forget that taxpayers pay their salaries. How can you justify spending millions of taxpayers' dollars on this proposed project in this economic time? I live on Kearsley Road across the street from the proposed site. I believe this will impact the residents of Gloucester Township in a negative way: the area proposed is a residential area and will not help the resale value of our homes which are already going down because of the mortgage mess the country is currently experiencing.

Thank you for your consideration,

Deana Korczynski
947 Kearsley Road
Erial, NJ 08081

-----Original Message-----
From: imjoeleck@comcast.net [mailto:imjoeleck@comcast.net]
Sent: Tuesday, July 28, 2009 2:33 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: LECKERMAN, TERRY
Subject: the proposed army reserve center on berlin cross keys rd sicklerville nj

Dear Laura

in regards to your proposed army reserve center on berlin cross keys rd in sicklerville nj to put it simply please choose another site for this center as this is a growing residential community which has no room or the tollarance for such a center.we pay a very high amount in home taxes in order to live in peace and quiet and we do not need to have to see and hear military equipment and jeeps,trucks,air planes,hellicopters and whatever else would accompany such a center.you can be assured,we will fight this action in anyway we can.today is july 28th 2009 why in the world would we just get this written notification today and not at least a month ago? it seems you are using todays politics in regards to jamming something like this down our throats the very last minute so that we all do not have time to read this or time to get sufficiant help concerning this.your time frame and your use of politics is an outrage to the residents of our fine community,again we are a growing residential community with families and are in no need of this type of center to be put right in the middle of our community. please refrain from doing so and search other parts of the state which will be more accomidating for such a center.

thank you so much for your expected cooperation and understanding and good luck with your new site just as long as it is no where near our homes and families..

mr. joseph leckerman (home owner)

-----Original Message-----
From: joedianel@comcast.net [mailto:joedianel@comcast.net]
Sent: Wednesday, July 29, 2009 5:30 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: mayor@glotwp.com
Subject:

To whom it may concern,

We live on Diana Court. Our neighborhood is on the corner of Kearsley and Crosskeys Roads. We are opposed of the reserve site you are planning a 1/2 mile from our house. This area is already way to crowded, and traffic is impossible. Crosskeys Road and Kearsley Road are both one lane roads There are many more land sites that are not on main roads. Roads that a lot of people already use to get to work and back are already way to busy. Adding to the problem will be more accidents and probably road rage. .Please pick a spot that is more remote and traffic will not be an issue to anyone . .

Thank you ,

Joe & Diane Lynch

Amy Mallonee
7 Kenwyck Court
Erial, NJ 08081

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Fax: 609.562.7983
Laura.dellolio@usar.army.mil

RE: 30-day public comment period for the BRAC Realignment Actions in Camden County, NJ

To whom it may concern:

I wish to oppose the construction of the proposed military facility on Cross Keys Road and would like to see such a facility built in a non-residential area. There are other non-residential, already tax-exempt properties that would offer a better fit for such a facility. The proposed facility would disrupt our neighborhood as well as depreciate our home values. We, the residents of Gloucester Township, do not want to hear drills and machinery during our weekend retreats in our backyards. We do not want our children's playground to be the backdrop for a parking lot or maintenance shop. Kindly look for an alternate site.

Thank you for taking the time to hear my voice.

Sincerely,

Amy Mallonee

From the Office of Mayor Cindy Rau-Hatton Gloucester Township

P. O. Box 8
Blackwood, NJ 08012
(856) 374-3514
Fax: (856) 374-5721

FAX TRANSMISSION COVER SHEET

Date: *July 27, 2009*

To: *Laura Dell'Olio*

Fax: *609-562-7983*

Re: *Letter re: Public Comment period on the EA and Draft FNSI regarding 389 Cross Keys Road, Gloucester Township, Camden County, New Jersey*

Sender: *Emmy A. Keating (for Mayor Rau-Hatton)*

YOU SHOULD RECEIVE __3__ PAGES, INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (856) 374-3514.

GLEN V. BIANCHINI
Council President

ORLANDO MERCADO
Council Vice President

Council Members
CRYSTAL EVANS
DAN HUTCHISON
KENNETH GARBOWSKI
SHELLEY LOVETT
FRANKLIN T. SCHMIDT

TOWNSHIP OF GLOUCESTER

1261 Chews Landing-Clementon Rd., at Hider Lane
P.O. Box 8, Blackwood, New Jersey 08012

(856) 228-4000 • FAX: (856) 374-3527 (Clerk)
FAX: (856) 374-3528 (Finance)

CINDY RAU-HATTON
Mayor

THOMAS C. CARDIS
Business Administrator

DAVID F. CARLAMERE, ESQ.
Solicitor

ROSEMARY DIJOSIE
Township Clerk

July 27, 2009

Laura Dell'Olio
Environmental /NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640

Sent via: Regular mail and Fax

Re: Public Comment period on the EA and Draft FNSI regarding 389 Cross Keys Road, Gloucester Township, Camden County, New Jersey

Dear Ms. Dell'Olio,

This letter is my request for an extension of the 30 day public comment period on the EA and Draft FNSI. The comment period is from July 2 through July 31.

The EA report states (1.4 on page 1-3) *"The Army invites public participation in the NEPA process. Consideration of the views and information of all interested persons promotes open communication and enables better decision making. All agencies, organizations, and members of the public having a potential interest in the Proposed Action, including minority, low-income, disadvantaged, and Native American groups, are urged to participate in the decision making process."*

The Township Mayor and Council received no formal correspondence until the letter from the Louis Bergen Group of Rhode Island, dated June 30, 2009 and received on July 6, 2009. No detailed plans were submitted for review to the Planning Board or Township officials.

Residents were instructed to *"review during the public comment at the following local libraries"*. The libraries, located in Berlin and Pennsauken are not in the Township and are quite a distance from Gloucester Township. The Burlington Library is not even located in Camden County. The three libraries are inconvenient to our residents, especially considering we have a library within our community.

July 27, 2009
Ms. Laura Dell'Olio
Re: Public Comment Period
Page 2

Congressman Robert Andrews, a senior member of the Armed Services Committee was not notified. Residents within 200 feet of the property received a letter dated June 30 in July. Residents should not be expected to download a 216 page document.

The residents and the Township government were not given sufficient time to review the information. The information was not located within the Township border for residents to review. The manner in which the Army presented the information defies the definition of an open and public process.

I request the public comment period be extended by an additional 30 days and should have a public hearing at the Municipal building. It should be advertised by an ad (in addition to a legal advertisement) and give the Township the opportunity to place it on our Public Access Channel and Township website.

Therefore my request is justified and should be approved by the Army in order to provide optimal public participation.

Please do not hesitate to contact me if I can be of assistance. I can be reached Monday through Thursday, 8:00 am until 5:45 pm, at (856) 374-3514.

Sincerely,

Cindy Rau-Hatton

Cindy Rau-Hatton
Mayor

CRH/eak
cc: Congressman Rob Andrews
Township Council
Dave Carlamere, Esq; Township Solicitor
Ken Lechner, Township Planner

From the Office of Mayor Cindy Rau-Hatton Gloucester Township

P. O. Box 8
Blackwood, NJ 08012
(856) 374-3514
Fax: (856) 374-5721

FAX TRANSMISSION COVER SHEET

Date: *July 28, 2009*

To: *Laura Dell'Olio*

Fax: *609-562-7983*

Re: *Resolution from Gloucester Township Council*

Sender: *Emmy A. Keating (for Mayor Rau-Hatton)*

YOU SHOULD RECEIVE __3__ PAGES, INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (856) 374-3514.

Attached please find the resolution passed July 27, 2009 by Gloucester Township Council.

Thank you,

Cindy Rau-Hatton
Mayor

R-09:07-226

RESOLUTION OF THE TOWNSHIP COUNCIL OF THE TOWNSHIP OF GLOUCESTER IN OPPOSITION TO THE LOCATION OF THE PROPOSED ARMED FORCES RESERVE CENTER TRAINING FACILITY AT CROSS KEYS ROAD

WHEREAS, Township Council has been made aware that the United States Army desires to locate an Armed Forces Reserve Center Training Facility at Cross Keys Road, and

WHEREAS, the Township Council has not been provided advance notice of this intended use and has not been afforded the opportunity to evaluate the impact on economic and quality of life issues caused by said facility, and

WHEREAS, Cross Keys Road is a highly desirable commercial location within the Township of Gloucester and to use this commercial location for a United States Armed Forces Reserve Center Training Facility would mean the loss of a significant tax ratable for the Township residents; and

WHEREAS, the Township Council has been informed that the Armed Forces Reserve Center Training Facility proposes significant week-end training of upwards of 187 personnel; and

WHEREAS, The proposed Cross Keys Road location backs up to a residential community and to permit this form of extensive week-end training would have a significant impact on the quality of life for the adjoining residence; and

WHEREAS, The Township Council has been informed that the public information has been made available at a location in the Township of Pennsauken, Borough of Berlin and Burlington City, but no location for public review has been provided within the Township of Gloucester, and the Township Council finds this lack of availability to Gloucester Township Residents extremely objectionable.

NOW THEREFORE, The Township Council of the Township of Gloucester **RESOLVES** as follows:

That the United States Army immediately delay any further proceeding for the intended facility at Cross Keys Road and extend the public comment for a period of 45 days and thereafter, schedule an open public hearing with Notice, such hearing to be located within the Township of Gloucester for more accessibility to Township residents.

That the United States Army withdraw it proposal to locate an Armed Forces Reserve Center Training Facility at the intended Cross Keys Road location.

That the United States Army work with Township Mayor and Council to identify a more suitable location within the Township of Gloucester for this type of Army facility.

That the Township Solicitor is authorized to research legal issues to restrain the United States Government from locating the Armed Forces Reserve Center Training Facility at the Cross Keys Road site.

BE IT FURTHER RESOLVED, that copies of this Resolution be forwarded to Senator Frank Lautenberg, Congressman Robert E. Andrews, Representatives of the Fourth Legislative District and the Camden County Freeholders.

Adopted: July 27, 2009

Glen V Bianchini
PRESIDENT OF COUNCIL

ATTEST:

Rosemary DiJosie
TOWNSHIP CLERK

GLEN V. BIANCHINI
Council President

ORLANDO MERCADO
Council Vice President

Council Members
CRYSTAL EVANS
DAN HUTCHISON
KENNETH GARBOWSKI
SHELLEY LOVETT
FRANKLIN T. SCHMIDT

TOWNSHIP OF GLOUCESTER

1261 Chews Landing-Clementon Rd., at Hider Lane
P.O. Box 8, Blackwood, New Jersey 08012

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CINDY RAU-HATTON
Mayor

THOMAS C. CARDIS
Business Administrator

DAVID F. CARLAMERE, ESQ.
Solicitor

ROSEMARY DIJOSIE
Township Clerk

August 27, 2009

Laura Dell'Olio
Environmental /NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640

Sent via: Regular mail and Fax

Re: EA and draft FNSI regarding 389 Cross Keys Road, Gloucester Township, Camden County, New Jersey

Dear Ms. Dell'Olio,

Please accept these enclosed comments in my capacity as Mayor of the Township of Gloucester. My comments are inclusive of the many residents that have contacted me regarding this issue. I wish to make it clear that Gloucester Township welcomes the Army Reserves Center to our Community. However it needs to be located at a suitable site that does not adversely impacts the quality of life of our residents, and secondly, a site that is already tax-exempt.

The EA report states (1.4 on page 1-3) *"The Army invites public participation in the NEPA process. Consideration of the views and information of all interested persons promotes open communication and enables better decision making. All agencies, organizations, and members of the public having a potential interest in the Proposed Action, including minority, low-income, disadvantaged, and Native American groups, are urged to participate in the decision making process."*

The Township Mayor and Council received no formal correspondence until the letter from the Louis Bergen Group of Rhode Island, dated June 30, 2009 and received on July 6, 2009. No detailed plans were submitted for review to the Planning Board or Township officials.

Residents were instructed to *"review during the public comment at the following local libraries"*. The libraries, located in Berlin and Pennsauken are not in our Township and are quite a distance from Gloucester Township. The Burlington Library is not even located in Camden County. The three libraries are inconvenient to our residents, especially considering we have a library within our community.

The Army did not establish a partnership with Township Officials and residents to find the proper home for the Center and to have optimal public participation. The process is flawed. Therefore, the Army did not meet their goal.

The proposed site, located on the Berlin-Cross Keys corridor, was zoned to highway commercial in the 1998 revision of the Gloucester Township Master Plan in order to promote and establish commercial tax ratables. According to Phil Rowan, the Township's economic consultant, the property has an estimated commercial value of $26 million and could generate $715,000 in taxes for the two school systems, Camden County, Fire District and local (Township) taxes. (See attached letter)

Gloucester Township contains many existing properties that are already tax-exempt. I have already forwarded them to Kevin Jasper and we discussed the sites at the July 30 meeting between the Army and Township Officials. It appears Lakeland is the most feasible site.

Gloucester Township is 24.5 square miles with a population of 68,000 people. We are 85% residential. Residents value their quality of life as they raise their families. The EA report does not address the impact to the surrounding neighborhood and quality of life issues. Therefore the report is flawed.

The Winslow Township site shares the exact same circumstances and concerns as Gloucester Township.

It is paramount in government to have an open and public process, where all interested parties can participate. I request the Army establish a committee which would include Gloucester Township, Winslow Township and Camden County in order to form a partnership in selecting the best and appropriate site for the center.

I look forward to being part of the process. Gloucester Township would be honored to be home for the Army Reserves Center.

Please accept my letter as part of the official record for the public comment period, which expires August 30. I thank you in advance for your anticipated cooperation in this matter.

If you need to contact me, I can be reached Monday through Thursday, 8:00 am until 5:45 pm, at (856) 374-3514.

Sincerely,

Cindy Rau-Hatton

Cindy Rau-Hatton
Mayor

CRH/eak
cc: Ro DiJosie, Twp. Clerk
Congressman Rob Andrews
Sandy Kelly, Camden County Improvement Authority

Gloucester Township
Economic Development Corporation

PRELIMINARY FISCAL IMPACT ANALYSIS

389 CROSS KEYS ROAD

GLOUCESTER TOWNSHIP, NEW JERSEY

Background

The federal government is considering the purchase and development of an approximate 10.8 acre site located at 389 Cross Keys Road in Gloucester Township, New Jersey for use as an Army Reserve Center. The current site is zoned Highway Commercial, which provides for a wide variety of commercial uses along Cross Keys Road (CR 689), which is a high-volume arterial road that connects Berlin with the Atlantic City Expressway to the west. Several large retail developments have recently been developed along Cross Keys Road west of the site.

Loss of Commercial Development Potential

The site is currently zoned for Highway Commercial development and is located in an active commercial growth corridor along busy Cross Keys Road. Within the past five years, numerous commercial developments, including small to large retail developments have been completed along this highway. A new lifestyle retail and restaurant center, The **Shoppes at Cross Keys**, held its grand opening on August 1st. Although current market conditions for retail and restaurant development are severely impacted by the current recession, upon an forthcoming economic recovery, this site will have strong development potential.

The 10.6 acre site could support the development of approximately 130,000 square feet of new retail/restaurant development. This would provide for adequate set-back, on-site drainage detention, landscape, parking lot and walkways. The development would have a currently estimated value of $200 per square foot or $26,000,000. This development would also have the potential to create between 130 and 260 new jobs, many of which would be secured by residents of Gloucester Township.

Loss of Development Real Estate Tax Potential

The projected new commercial development on the site would have an all-in present value of approximately $26,000,000 for the buildings and underlying land. Using the current assessment ratio and the current tax rate, the projected development could generate significant local dollars for the taxing district including Camden County, local school districts, Gloucester Township and the local fire district on an annual basis. Should the federal government acquire the land for the proposed Reserve Center, this future tax flow would be lost for the foreseeable future.

June 26, 2009

To whom it may concern,

I am writing to you as a mother and a taxpayer. I believe in a strong military and appreciate all of our freedom as an American. However I must object to the proposed military facilities adjacent to our properties. I live at 937 Kearsley Road and my husband and I are opposed to the proposed construction.

I am concerned about the affect it will have on my three year old son. I have a deep concern that there will an increase in traffic congestion as well as an increase in noise level. We have already had an increase in traffic in the last four years I have been a resident here.

This will not help our neighborhood remain quiet. The wildlife already have nowhere to go with the new construction near us already. We moved here because of the nice wooded area and how quiet it is.

This will depreciate the value of our homes and no one would want to purchase property with this facility so close.

Sincerely,
Michael McGinness and
Michelle McGinness

-----Original Message-----
From: mmclaughlin_1@comcast.net [mailto:mmclaughlin_1@comcast.net]
Sent: Sunday, August 30, 2009 1:17 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Cross Keys location Gloucester Township, NJ

Ms. Dell'Olio,

I am responding to a recent meeting held in Gloucester Township. I was extremely disappointed to discover a Gloucester Township site as one of the potential locations for an army reserve building. Although I would welcome a building such as this in our town, I do not want the current site under consideration as this is prime commercial property which we desperately need for ratables. We have many sites in this town that are currently tax exempt which would provide the area you require and would not cost our tax payers more money.

I was also disturbed to find this property was sold to a developer for $500,000. and offered to the army for 2.3 million, which was more than the appraised value. This is upsetting to know my federal tax dollars are lining someones pocket. How does someone purchase land and resell it quickly for a large profit. I'm sure the army was not aware of this but it appears to be insider information that someone made a lot of money.

As for the way the army came into my town making decisions without the knowledge of our Mayor frustrates me. With today's economy one would think the US government would do what they could to minimize any additional cost to it's citizens. By not contacting our Mayor or Township officials you will cost me money out of both pockets. One taking away tax dollars and the other spending more than is necessary. We are all struggling to make ends meet yet the army was irresponsible in the approach of this project.

By the amount of people who attended the first and only town meeting to discuss this project, I believe it was obvious Gloucester Township residence do not want this site selected for this project. I understand there is a time line issued by the BRAC commission for completion however due to the lack of communication I would respectfully request this due date be extended for one year. This would allow the Township Officials to work with the Army to select a more suitable site.

Thank you for your consideration.

Maureen McLaughlin

-----Original Message-----
From: Webpack@aol.com [mailto:Webpack@aol.com]
Sent: Thursday, August 06, 2009 9:27 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: Mellacesells@aol.com
Subject: ARMY Gloucester Twp.

Gloucester Township NJ, July 27, 2009

Mayor Cindy Rau-Hatton in another exhibition in incompetence turns her back on a potential $22 million dollar windfall from the United States military. When notified of the proposed plans of the United States Military moving their campus, and housing from Pennsauken to Gloucester Township Mayor Rau-Hatton claimed she did not get the memo and only learned of the project from a proposed sewer expansion request. Rau-Hatton went on to state she was opposed to the military's plans for Gloucester Township stating she has "a long list of concerns."

Despite the desperately needed upgrade in housing facilities our soldiers and their families need and deserve, for all they sacrifice, for our country, our protection, and our safety, Mayor Rau-Hatton admittedly would rather turn her back on the military which has offered Gloucester Township a generous potential $22 million dollar windfall in construction jobs many of which would be awarded to our local out of work union workers, as well as the numerous jobs that would be created in the municipality that are just as desperately needed since most of the businesses in this part of town are failing because of the lack of patrons. Need I remind our mayor of the $5.5 million dollar budget deficit Rau-Hatton presented to council just as short time ago?

This project when completed would bring approximately 375 military families and that would certainly sure up the economy in an area of our town that could desperately use the additional financial support they would bring to those failing businesses. There is also the issue of the safety and stability this project would bring. With the military presence in Gloucester Township the current gang problems, which are prevalent in that part of Gloucester Township, would certainly be curtailed and deterred. This should be welcomed by our local police as it is no secrete Gloucester Townships police force has certainly been expending a great portion of its resources investigating and breaking up gang activity in this same area.

It's ironic that the mayor has found a new ally in her fellow running mate Republican State Assembly Candidate Gene Lawrence's friend Councilwoman Crystal Evans who lobbied with the mayor against the military saying it would be located to close to our middle class families. It makes you wonder what does she even mean by that? There is an old saying that people associate and hold friendships with people who have like values to their own. That being said Councilwoman Crystal Evans's position of not wanting to live near our military soldiers being now known, I have to ask does Gene Lawrence hold those same values? If so god help us all!

Our military families are proud people with more dignity and honor than anyone could imagine. They risk their lives to protect us everyday and Councilwoman Crystal Evans should be embarrassed to have said she would not want to live near

our military families. I for one welcome the United States Military with open arms and would be proud and honored to live side by side with any US soldier. Everyday of the week!!

With Great Thanks to our Military,
Frank Mellace Proud resident of GT
424 Hillcrest Ave
Blackwood NJ 08012
856-625-4587

-----Original Message-----
From: Webpack@aol.com [mailto:Webpack@aol.com]
Sent: Thursday, August 06, 2009 11:15 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Gloucester Township Military Site

Default<http://www.pennjersey.info/forums/images/icons/icon1.gif> US ARMY BRAC REPORT Rau Hatton failed to give the public until now! posted in penn-jersey forums _____

As you are all aware our Mayor Rau Hatton and her alliance with the disgraced Councilwoman Crystal Evans has caused a fury in the south end of town over the proposed Army Reserve Military Simulation Base. People need to understand the real information not the misinformation Rau Hatton has been spreading. This base will be completely interior with all field simulations training, IE. a Virtual Reality Arcade for soldiers to train under controlled conditions which record their field reaction and help our proud military heroes, whom risk their lives for our freedom, better train for live combat.

What is not understandable is why mayor Rau Hatton has not in any interview to date made any quote claiming she was doing this for the residents nearby or that she was doing anything for any resident anywhere for that matter. In fact her only printed quotes state that she is concerned only about the loss of the approximately $2,000 a year this property is generating in tax revenue a revenue which certainly will be lost if the property is allowed to be developed commercially because of the 20 year tax abatement that certainly will be given to any contractor foolish enough to build in this economic environment. The existing businesses on that side of town are failing faster than they are opening some business even buying out of their leases just not to have to open in this economy which would certainly doom them to failure.

If you want the truth about what is planned for this facility which will be built to the benefit of all, if it comes to Gloucester Township, because the personal that attend this training will support the businesses on that side of town. Gas, cigarettes, and coffee sales alone in the existing businesses surrounding this site will generate tax revenue in this town by supporting those businesses. This revenue for the towns tax payers is much more substantial then this current vacant farmland generates currently.

Rau Hatton claims an unsubstantiated tax of $700,000 that would be lost with the military choosing this site. I'd like to know how much Rau-Hatton plans on raising our taxes to lose that type of revenue. Considering the land is only generating just about $2,000 a year right now. More concerning to the residents should be the alternative of what type of commercial property Mayor Rau Hatton and her friend Councilwoman Crystal Evans are planning on putting on this "RATABLE" that could generate $700,000 a year in taxes? As an example the Deptford Malls taxes are not $700,000 a year. That is the type of construction it would take to generate that type of tax income.

Guess what?
The property is not large enough at our tax rates to generate that type of income. It would take commercial construction on it in every square inch of the

land. Our roadway info structure would not support the traffic generated by that type of business construction on this site. I've been saying this from before the existing businesses were even built.

If we continue to build commercial at the rate we are going were headed down a slippery slope of empty buildings on that side of town. Look this is not a baseball field just because you build it does not mean customers will come. Look no further than Circuit City to see that fact. What is Circuit City bringing into this town now NOTHING BUT BLIGHT. IT"S CLOSED DOWN! A vacant empty shell is what happens when you continue to allow commercial and hand out abatements without recourse in case of business failure.

The truth in the project is here: BRAC Environmental Assessment

The 3 links listed here are to the original complete BRAC report and Environmental Assessment study as well as letter of public notice.

They are downloadable:

http://www.hqda.army.mil/acsim/brac/.../Camden_EA.pdf
<http://www.hqda.army.mil/acsim/brac/EA_DOCS/EA_review/Camden_EA.pdf>

http://www.hqda.army.mil/acsim/brac/...amden_FNSI.pdf
<http://www.hqda.army.mil/acsim/brac/EA_DOCS/EA_review/Camden_FNSI.pdf>

http://www.hqda.army.mil/acsim/brac/...Camden_NOA.pdf
<http://www.hqda.army.mil/acsim/brac/EA_DOCS/EA_review/Camden_NOA.pdf>

It's time to stand up to Mayor Rau Hatton and Councilwoman Evans and advise them that you're in favor of giving our United States Military Heroes the best possible facilities to train and tell them you are proud they would want to partner with Gloucester Township and support our businesses and residents.

It is also time to send a clear message to Councilwoman Evans that we should be honored that our military wants to come here. Make them understand that Councilwoman Evans comments of not wanting military families living so close to our middle class families is not the disgraceful attitude that the residence of Gloucester Township want portray.

With Great respect to our United States Military Heroes!
Proud Resident of Gloucester Township

Frank Mellace
424 Hillcrest Ave
Blackwood NJ 08012
856-625-4587

Comments on the EA and Draft FNSI should be submitted during the 30-day public comment period via mail, fax, or electronic mail to: Laura Dell'Olio, Environmental /NEPA Specialist, 99th RSC, DPW ENV, 5231 South Scott Plaza, Fort Dix, NJ 08640, fax: (609) 562-7983, email: laura.dellolio@usar.army.mil
<mailto:laura.dellolio@usar.army.mil>

-----Original Message-----
From: Webpack@aol.com [mailto:Webpack@aol.com]
Sent: Wednesday, August 12, 2009 9:26 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Gloucester Township Military Facility

To ALL NJ Military Soldiers and Retired Veterans, As an active or retired military hero I know you can understand how I feel. I ask you to please pass this along. The United States Military has determined the Pennsauken NJ Army National Guard Training Facility is obsolete and in need of an overhaul, to bring it up to date with today's technology. To do this they determined it would be more efficient to build a new facility in Gloucester Township NJ. The new facility would be a technological training center with all simulator technology being employed and in all interior facilities.

The Mayor of Gloucester Township Cindy Rau Hatton is vowing to fight the US Military stating the town would lose a valuable ratable (taxable) property by allowing the military into our community. Councilwoman Crystal Evans stated she would not want this facility in our town because she does not believe the military should house near as she stated "Our middle class families."

I assure you this is not the Sentiments of the majority of blue collar American families in this town that are proud supporters of our military, most of which have been in the service or have had injured or lost loved ones in the military over the years. Those are the types of unfortunate events that may not have happened had our soldiers been given the best most up to date facilities to train in.

Sentiment for both sides have been strong mostly because of misinformation being spread by Mayor Rau Hatton, most notably a letter that advised surrounding neighbors of the proposed complex that there would be live munitions training at the facility that would disrupt their tranquility and this is simply not true. We need military personal to attend and explain how this type of operation is not only a benefit to the soldiers training but the community as a whole.

The US military is going to conduct a presentation on this proposed facility to advise the residents of what they truly have planed for the site. The public hearing is August 17, 2009 @ 7 PM at the Gloucester Township Municipal Building. I would love to have as many Military families out to show our towns support for the Military and advise Mayor Rau Hatton that our military deserves the best possible facilities to train in. The men and women of our military are the most honorable and proud people in our society. We need to make sure The US Military soldiers who protect us and have protected us, for hundreds of years now, understand we know and appreciate the fact that they make the ultimate sacrifice for our freedom every Day they strap their boots on to protect us. Without question they deserve the proper training facilities to keep themselves trained properly to stay safe and protect us. They do this for all of us! The least we can do is support them by advising the US Military that we welcome them with open arms and thank them for the honor to be considered a town worthy and willing to help our heroes!

With Pride in our Military Heroes,

Frank Mellace

-----Original Message-----
From: Webpack@aol.com [mailto:Webpack@aol.com]
Sent: Friday, August 14, 2009 3:54 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Gloucester Township Amory proposal

Francis Mellace

424 Hillcrest Ave.

Blackwood NJ 08012

856-625-4587

August 13, 2009

Ms. Dellolio,

It has been brought to my attention that sometime in the week of or approximately the week of 10/20/2006. Mayor Cindy Rau Hatton and John Custodio Flew from Timber creek High School to Fort Dix to tour the facility with some of the local ROTC children.

Can you please advise me of when that was scheduled? The purpose of the visit and what transpired during that visit including the type of tour what was toured and if there were any preliminary conversation as that time as to the possibility of Gloucester Township being chosen as a potential site for this proposed new base? Please also the names of any military personal involved with that visit.

Also please forward me all correspondence with any Gloucester Township officials regarding this proposed project in Gloucester twp. Include all emails and written letters sent and received with proof of delivery receipts if available. I wish to have this sent to me in electronic format to my email webpack@aol.com <mailto:webpack@aol.com> or via fax @ 856-582-0605.

I am requesting the copies of the electronic media (email or notes) used to produce your previous correspondences to Gloucester Township officials. Please forward to me copies of all letters and correspondence in electronic format both to and from Mayor Rau Hatton, Ken Lechner, any other Community development entity including Black Horse Pike Regional School District its personnel and school board members, Gloucester Township Municipal Utilities Authority, Gloucester Township Planning and or Zoning Board, Aqua New Jersey, Camden County Municipal Utilities Authority, Any Camden County Freeholders, Any Congressmen or Senators

or General Assembly personnel as well as the letters to the residence. Please do not forward the actual Brac Report or Environmental Study I already have those documents. Please include all correspondences from 7/1/2006 to the present.

If this is not proper protocol does this need to be requested in an official OPRA request or a Freedom of Information Request and if so can you please forward me the form or a link to the proper forms you will require.

A hearing on this planned is Monday August 17, 2009 in Gloucester Township so time is of the essence in your response.

Truly yours,

Francis Mellace

424 Hillcrest Ave.

Blackwood NJ 08012

_____

Dennis W. Palmer, P.E., P.P.
10 Braemar Ave.
Blackwood, NJ 08012
DMKM10@aol.com

Licensed Professional Engineer in NJ & PA
Licensed Professional Planner in NJ

Laura Dell'Olio,
Environmental NEPA Specialist,

Innovar Environmental Inc., supporting,
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640

Sent via email and fax
609 562-7983

July 30, 2009

Re: Proposed Facility Gloucester Township

Dear Ms. Dell'Olio

This letter is being submitted in response to the FNSI issued on the proposed new site located on Cross Keys Road in Gloucester Township. This letter are my opinions and are not to be take as I am prejudging your project conformance with planning, but rather raise several issues that need to be addressed.

The first being public involvement and participation. I note on page 1-3 section 1.4 reads "*The Army invites public participation in the NEPA process. Consideration of the views and information of all interested persons promotes open communication and enables better decision making.*" I find this at best disingenuous to the people that live in Gloucester Township. Until our Mayor raised an issue on this proposal, no copies were provided in local libraries or other suitable location for our residents. To place two copies at out of town locations and one out of county and no public hearing held in town is a slap in the face of our residents. <u>That said, I am asking for a 30 day extension of the public comment period.</u>

<u>I think also the project should come before the local planning board.</u>

I disagree with the findings of Table ES-2 of the Executive Summary as it appear to be significant impact on land use, impacts on near by residents, noise , traffic, only a two lane road, impact on property values, loss of ratable, negative impact on the neighbors as to their quite enjoyment of their property.

On page 1-4 item 1-5, I disagree with using the year 2008 as the baseline after the site had been cleared. I would like to recommend the use of 2007 pre cleared site.

On page 2.5 listing vehicles under table 2-2, how many of these vehicles are diesel powered?

On page 3-1, Section 3 Alternatives, I think other locations that may lend themselves to better partnerships could be developed. The County Vo-Tech school site and immediate land may have several benefits and synergies that should absolutely be explored and pursued. Also, the nearness of residential properties is less adjacent or on the Vo-Tech site. Page 3-4 clearly demonstrate the close proximity of the homes to the proposed site. I would recommend the further examination of already tax exempt property that would meet the Army's criteria bee examined, specifically the Vocational school site. (Technical Institute of Camden County)

Page 3-8 has the No Action Alternative from which all alternative are judged as the partially cleared land. If no action took place this land could go through old succession and be wooded and be more expansive in its woodland nature and environment. That should be the baseline.

Page 4-11, Section 4.3.2.2. I disagree that with out public input or a public hearing like at a Planning Board meeting, you can not make such a blanket comment. The residents near by near to be heard from.

Page 4-12, 4.4 needs to address how many of the relocated vehicles are diesel powered. A normal commercial site such as stores would have a few deliveries per week, but if a substantial number of diesel engines are at this site, it is not equal to a "normal" land development even for a commercial site.

Page 4-15, 4.5 Noise. Will army activities be kept to the noise limits, especially on weekends? It would strike me that the troops on this base would be up and active prior to 7am. On page 4-21 it states "The noise impact created by facility and vehicle operations; however, is rarely considered significant." I would like to hear testimony from the neighbors with respect to the quiet enjoyment of their properties on drill weekends if this would be to their agreement.

Starting on page 4-27 under 4.6.1.3 Prime Farmland the statements "No impacts to prime farmlands would be expected. Although the site contains soils that are considered farmlands of unique importance and farmland of statewide importance, the project site is zoned commercial and therefore is not subject to the FPPA. The Proposed Action also does not remove prime farmland from the prime farmland inventory as the property has already been removed by local land use planning and zoning." (page 4-28). This misses a huge point of interest to the township. While it may have been removed by planning, if it was replaced with a commercial development, the municipality would gain a tax paying ratable and also the payment of the roll back taxes for the change in use for farming to commercial. This critical missing part and fallacy of this section. It is strongly suggested that other land already not being taxed should be utilized. As previously suggest the County Vo-Tech School site.

Page 4-41, 4.8.1.3 Threatened, Endangered, and Sensitive Species. The NJDEP Natural Heritage Program indicated the occurrence of several state rare wildlife species or wildlife habitat at the Preferred Alternative. In fact four state Rare wildlife species are anticipated to inhabit the site.

Page 4-57, 4.10 SOCTOECONOMICS. This entire section totally misses several points. It misses the anticipated negative impact on the property values of the adjacent residential area. It misses and does not address the removal of additional property from the township tax rolls, a township already with a disproportionate amount of land already used for several county facilities and a new proposed large religious cemetery. There is no impact analysis of the addition of another non taxpaying development. It does not addressed the roll back taxes for 3 years and the payment as would be required if the site was develop in the normal course as zone commercial and a commercial property was installed.

Page 4-74 Solid Waste; there is no mention as to recycling in this section.

Page 4-78, 4.14 "Camden County plans to widen Cross Keys Road from two to four lanes within the County east to White Horse Pike (U.S. 30) (Morris, 2008). Although this project is not currently federally funded as part of Delaware Valley Regional Planning Commission's (DVRPC) FY 2009 - 2012 Transportation Improvement Program (TIP), it was identified by DVRPC in its Long Range Plan, Destination 2030." The project will have vehicles entering and leaving the site on a 2 lane county road with no anticipated date for widening. I can foresee problems at this site.

In conclusion, there are other sites that must be considered that should not result in the loss of a tax ratable, have less impact on residential areas and offer greater synergies. Absolutely the public comment period should be extended and a local public hearing held.

Submitted by,

Dennis W. Palmer, P.E., P.P.

-----Original Message-----
From: dpalogruto@comcast.net [mailto:dpalogruto@comcast.net]
Sent: Tuesday, July 14, 2009 11:24 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: AFRC Comment

To Whom It May Concern:

We are irate that the property, on Cross Keys Road is being considered for an Armed Forces Reserve Center. We have lived in the area over 25 years and have seen a lot of changes over time. We are open to change but in this case we see this as a very negative addition in our community. The traffic on Cross Keys Road is horrendous especially where it bottlenecks into two lanes (right at this proposed AFRC site). What was once acres of trees and wildlife will now be parking lots, storage buildings, military equipment and vehicles and trailers- just what we want to look at every day! What kind of noise and air pollution will this create during the years of construction of this site? What about once it is completed- continuing noise and pollution- will it ever end? We don't think so. What about our home values? We put a lot of hard work and money into our properties. Do you think our property will be attractive to potential home buyers? Do you think they will want to live near an AFRC site? How about you, would you want this in your back yard? Would you want your children to play at the township playground 500 feet from this project? Please do not put the Armed Forces Reserve Center on 389 Cross Keys Road. We look forward to your response and any future updates on this proposed project.

Thank you,

Diane and Frank Palogruto
10 Kenwyck Court
Erial, NJ 08081

2 pages sent by fax and email

July 15, 2009

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Fax: 609 562-7983
Email: laura.dellolio@usar.army.mil

We were absolutely appalled to return home from vacation to find a letter from you discussing an Armed Forces Reserve Center.

To begin, I have been in education for over 30 years and I cannot believe that there is not a better suited site available to build this devastator. It is very hard for me to fathom a military site that could be susceptible to terrorist threats, being built between a high school and an elementary school. Are you expecting to get high enlisting interest from the Votech School that would be adjacent to you? If so, that is disgraceful. Why did we not receive this notice during the school year when parents could be made aware? Another disgrace from the Department of the Army, The Environmental/NEPA Specialist, and Laura Dell'Olio, (the Environmental/NEPA Specialist). We are also appalled at our Mayor of Gloucester Township who claims that she knew nothing of this. This reserve center is receiving so much attention and controversy, how is our Mayor not aware?

On a personal note….my husband and I noticed workers in the field behind us and did speak with them. We were assured that The Army Core of Engineers had purchased the property and that it would be office buildings for the same. We were lied to. These past few weeks my family has spent over $35,000 to improve, and upgrade our back yard. This improvement includes an in ground pool. We thought we would be spending the rest of our lives at our current property enjoying our new pool and all of the yard upgrades. When we look at the map of your projected site we know that this could never happen. I will be looking, from my newly beautiful yard, into your yard of 61 wheeled vehicles and 40 trailers. Again, I am appalled. Not only will I have the scenery of your site, I will also be burdened with the noise that will accompany it. It is just not fair that you would plan such devastation in a rural community. Why not keep this site in the Camden area, perhaps near the river as is the River Front Prison...

I know that you have gotten quite a few response concerns from my neighbors, even though your paperwork claims there were no formal expressions from the community. I have copies of their comments that have been sent to you. Displaced animals has been mentioned, water run-off has been mentioned, existing wells have been mentioned, but I am concerned for the children of our neighborhood and schools, for the ugliness of the structures looking from our decks out doors, and for the overall atmosphere this type of facility will inject.

I was called today by several newspapers asking for my opinion on the site…..my family is being called “the people who dumped all the money in their yard to border an Army Reserve Facility”….believe me, I have a lot to say. I have appointments to meet with the leading newspapers in my area.

These are my concerns and comments that I would like forwarded to everyone concerned in the BRAC-related actions. We truly hope that you will decide to use the alternative site mentioned. I will anxiously await a reply from you.

Sincerely,
Mary & Nicholas Palumbi
9 Kenwyck Court
Erial, NJ 08081

-----Original Message-----
From: Beverly Pawlak [mailto:beverlypawlak@yahoo.com]
Sent: Wednesday, July 22, 2009 8:42 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Proposed construction of Army Reserve Site on Cross Keys Road

Beverly L Pawlak

900 Kearsley Rd

Erial, NJ 08081

July 22, 2009

Laura Dell'Olio

Environmental /NEPA Specialist

99th RSC, DPW ENV

5231 South Scott Plaza

Fort Dix, NJ 08640

Dear Ms. Dell'Olio;

I am deeply concerned about the impact of the proposed Armed Forces Reserve Center at 389 Cross Keys Road, Gloucester Township, Camden, NJ. We live in an established neighborhood of over 30 years, and to have this site imposed upon us is an unwelcome atrocity. Adjacent to a residential neighborhood is not an appropriate place for this complex. First, it can become a target. The environmental effects of run off from paving, displaced wildlife, unsightly buildings literally in some folks backyards, the noise it will bring, the traffic in the area, lose of privacy are all huge problems. Cars could conceivable cut through to the cul de sacs causing traffic and a huge imposition to people on those streets. It can affect the property values as well. My home is a 32 year investment thus far, and I am opposed to the negative effect of this site on my property value. Another site should be found that does not affect families and homes. I am adamantly opposed to this construction.

Yours truly,

Beverly L. Pawlak

-----Original Message-----
From: Michelle Peoples [mailto:mpeoples25@gmail.com]
Sent: Friday, July 31, 2009 11:43 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Re: Proposed Army Reserve Center Berlin-Cross Keys Rd

Dear Laura,

We have owned our home at 3 Kenwyck ct for 28 years and we strongly object to the proposed Army Reserve Center at 389 Cross Keys Road.
Paving 11 acres of land and bringing many cars and vehicles to the area will have a detrimental effect on our well. The aquifer will experience pollution from oil/gas residue runoff and the facility will also draw out more water than a residential/agricultural use. The inevitable traffic and more noise will have an adverse effect on our property value. This facility would require a zoning change and we would protest such a request. Our Mayor has sent other properties for your consideration, and we suggest you seriously consider those options.

Sincerely,

David and Marilyn Peoples

Dear Colonel Joseph H. Ledlow, USAR, August 19, 2009

I am writing in regards to the construction of the new Army Reserve Center at 389 Cross Keys Road, Sicklerville, NJ.

I understand that testing is still in the process concerning the project. However, I am writing to address the questions of the local residents over the new centers development. As well as, ways the Army may quell any apprehensions of the residents.

A member of my family lives adjacent to the property in Sicklerville and I have heard many complaints about the center.

I know that many of the residents have not read the entire 216-page report and its findings even though, it was available at local libraries and on the internet. Because of this fact, many residents have assumptions about the center. Some of these notions are, that there will be reservists living at the center during weekends, outdoor exercises causing loud noise, excessive lighting which disturbs residents, loss of the local playground, environmental issues, increased traffic within the area, loss of real estate property values, and the appearance of the facility. They also believe that the recent meeting regarding the center was a waste of time.

A synopsis (itemized summary) of the report would be informative for the residents who did not read the full report. If the Army needs to run sewer lines through the playground, would the Army replace the local playground with an equal or better playground? Will the new facility enhance real estate property values? Can a drawing of the facility be developed to point out how the center will aesthetically enhance the area?

I recommend that the Army send out a team to meet with the residents within the neighborhood answering any questions that arise. In addition, hand out a synopsis of the report and a sketch of the exterior of the new facility. A plan of the center and descriptions of the buildings would be vital to share with the people. Clarification with the local residents on concerns such as, what the buildings will store and what the buildings are for would eliminate any suspicions. Any other concerns not stated here, would be addressed immediately. Even residents whose property does not border the new center should be involved in the conversation.

Some residents feel that they would rather have an Army Reserve Center located in

their area rather than a shopping plaza. Utilize this knowledge as the bridge for residents accepting the Army center without complaint. If there is no impact on noise, water, and air pollution, the playground is restored, the area is aesthetically pleasing, the property values increase, and the lives of the residents are unaffected by the center, approval should be attainable.

I would like to know if there were any minutes taken at the recent meeting with the residents at the Gloucester Municipal building on Monday, August 17, 2009. If so, may I have a copy of the minutes according to the Freedom of Information Act? I would also like a list of who attended the meeting for the Army and what was their function.

Sincerely,

Lisa R. Phifer
320 West Branch Ave, Apt. 12E
Pine Hill, NJ 08021

856-784-3837
healingelk@hotmail.com

PS

As a Colonel, *you* need to approach the residents with the information. 'Get your stuff in order and wire it tight!

-----Original Message-----
From: Tony Pinch [mailto:tonypinch@alcirineo.com]
Sent: Friday, August 21, 2009 3:28 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: Army Reserve Center - Gloucester Twp. NJ

Dear Ms. Dell'Olio,

I'm writing to ask the Army to PLEASE reconsider their current choice for the location of new Reserve Center in Gloucester Twp. NJ. The current site is a commercially taxable parcel. We here in New Jersey need all the tax relief we can get and for the Army to take a source of taxes for township would be simply UNFAIR.

I've been informed that there is a tax-exempt property right down the road (+/- 100yds), just behind the Vocational & Technical School.

I support the military & realize that America as we know it would not exist without our brave men & women in uniform.

My only request is that the Army use a property that is already tax exempt & not convert a taxable property. I know my neighbors feel the same.

Thank you for your consideration.

Sincerely,

Anthony Cirineo

Gloucester Township Resident

-----Original Message-----
From: NANCY SCHMIDT [mailto:nschmidt@comcast.net]
Sent: Thursday, August 20, 2009 10:19 AM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: COMMENT: MILITARY BASE - GLOUCESTER TWP

I have lived in Gloucester Township all my life (60 yrs)...early years in Blackwood and now for the past 35 years in Erial. Nothing would make me happier or prouder than to have a military base on Kearsley Road.

I never realized our township was supposed to get into real estate??? They are doing a poor job.
After the township acquired the Nike base, which I am sure has more ground than 27 acres, has done nothing with it...can't sell, can't maintain it...looks like a sore, just recently installed a huge sale sign which does not meet code, almost in the street. Can't cut the grass, weeds, trees on it or maintain it so kids can safely walk to the stores...no sidewalks, no curbing...everywhere you go in this southern part of GT...it looks deplorable. Stores are out of business... and their so-called expensive business study plan to improve business on Blackwood Clementon Road has not changed anything.

And then there are the tax abatements for the new stores...what's with that.

This is probably one of the most corrupt towns in South Jersey. They allowed the Lakeside Business complex to be built, not on a lake as advertised, but an old sand pit which was allowed to dig so deep (75-100 ft?) and hit the Cohansey Aquifier, our drinking water. Runoff from the major streets keeps polluting it. No barriers or fences around it to stop kids from drowning. And when asked where was the fence, all she can say is the kids cut it. So I guess that justifies not putting it around the entire perimeter. Yes, welcome to our crazy township.

They do not keep proper records and will accuse you with, not having permits for things such as a pool or a fence, when in fact they are just too lazy to pull out the permits and review them. Too tired, too old, and too comfortable to do their jobs.

I WELCOME THE MILITARY
it would be great for the businesses in the area...
what are these people thinking off...just put it in.

-----Original Message-----
From: Jay Stiefel, DO [mailto:jaystiefel@comcast.net]
Sent: Wednesday, July 29, 2009 9:46 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: mayor@glotwp.com
Subject:

July 29, 2009

Dear Ms. Dell'Olio:

We vehemently oppose the construction and function of the Armed Forces Reserve Center (AFRC) proposed for the site of 389 Cross Keys Road, Gloucester Township, Camden County, New Jersey or 320 Erial Road, Winslow Township, Camden Country, New Jersey.

Our concerns are many and varied. Considering the global climate of terrorism and anti-US sentiment it is unconscionable that the United States Army would even consider the placement of a military facility in such a densely populated, residential area.

Positioning a military facility in either location puts our highly populated area at increased risk as a potential target for attack by those wishing to destroy our country.

Gloucester Township and Winslow Township are already over-developed, commercially and residentially. The construction of the proposed AFRC would destroy 11 acres of the little open space we have left and, in turn, would detract from the townships' tax base. Speaking as highly taxed Gloucester Township residents, we are angry.

We believe that an AFRC located "next door" or down the road, will decrease property values. In this regard, we have suffered enough since the recent collapse of the housing market. We are already living among foreclosed homes that have devalued our own home.

The presence of an AFRC on Cross Keys Road or Erial Road will dramatically increase the traffic that already exists on our crowded roads. Trying to turn out of our development onto Cross Keys Road, left or right, is already a challenge, any time, any day. The added road congestion by 300+ military personnel can only intensify this difficulty and frustration.

We reiterate our opposition to the proposed AFRC at 389 Cross Keys Road, Gloucester Township, Camden County, New Jersey or 320 Erial Road, Winslow Township, Camden Country, New Jersey. We can see no benefit to our neighborhoods or towns from such a facility. The negative impact, however, will be great.

Sincerely,

Jay and Lisa Stiefel

5 Gladwynne Court

Sicklerville, NJ 08081

-----Original Message-----
From: marj29@comcast.net [mailto:marj29@comcast.net]
Sent: Wednesday, July 29, 2009 7:40 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Cc: mayor@glotwp.com
Subject: army reserve center on berlin-crosskeys road

We are residents of the Forrest Woods development off of Cross Keys Road for almost 16 years. We are also senior citizens 80+.
This is a vehement objection against the building of the proposed Army Reserve Center practically in our backyard. It will destroy the fabric of our community and undermine the quality of our lives.
Build it somewhere else please.
Marjorie and Maceo A Thomas,Jr.
2 Gladwynne Court
Erial, Gloucester Twp

-----Original Message-----
From: kiranicole1@aol.com [mailto:kiranicole1@aol.com]
Sent: Thursday, July 30, 2009 6:05 PM
To: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Subject: PROPOSED ARMY RESERVE CENTER PLANNED FOR 389 CROSS KEYS RD. GLOUCESTER TOWNSHIP N.J.

DEAR LAURA,

I AM WRITING YOU IN REGARDS TO THE PROPOSED ARMY RESERVE CENTER PLANNED FOR 389 CROSS KEYS ROAD IN GLOUCESTER TOWNSHIP NEW JERSEY. MY HOME IS ON KENWYCK COURT WHICH IS THE STREET ADJACENT TO THE PROPOSED LOT SO YOU CAN SEE I HAVE MANY CONCERNS. I HAVE A 7 YEAR OLD DAUGHTER WHO REGULARLY PLAYS WITH THE MANY OTHER CHILDREN ON THE BLOCK WHO USE THE PLAYGROUND IN WHICH A SEWER LINE WOULD BE PLANNED TO RUN THROUGH FOR THE BASE, SO WERE DOES THAT LEAVE US WITH THE PARK, WILL IT BE TORN DOWN. ALSO WE DON'T NEED THE CHILDREN RUNNING OVER TO THE PARKING LOT AND BEING PUT IN HARMS WAY WITH ALL THE TRAFFIC THERE WILL BE ON THE BASE. THE BASE WILL BE AN EYE SORE TO ALL OF US ON THE BLOCK AND THAT IS UNFAIR, A COMMERCIAL BASE DOES NOT BELONG IN A RESIDENTIAL AREA. OUR PROPERTY VALUE WILL BE DESTROYED EVEN MORE THAN IT IS WITH THE CURRENT ECONOMY. AND NOT TO MENTION THE NOISE WE WILL HAVE ON THE WEEKENDS. WE ARE BLUE COLLAR PEOPLE AND WORK HARD ALL WEEK ONLY TO HAVE THE WEEKENDS TO RELAX AND WE DO NOT NEED THE DISTURBANCE. I CAN GO ON AND ON AND I'M SURE YOU HAVE HEARD FROM THE OTHER RESIDENTS IN THE AREA. I URGE THE ARMY TO TRY TO FIND A MORE SECLUDED BASE AND NOT WERE IT IS GOING TO HURT HARD WORKING PEOPLE. OR IF THEY MUST HAVE THE PROPERTY I WISH THEY WOULD OFFER US A BUY OUT I'M SURE THEY WOULD HAVE USE FOR OUR HOMES AND SURE WOULD SOLVE A LOT OF PROBLEMS. AS IT STANDS THE TOWNSHIP OFFICIALS AND THE RESIDENTS ARE STRONGLY AGAINST THE BASE DOES THE ARMY REALLY WANT TO BE WERE THEY ARE NOT WANTED. THANKS YOU FOR LISTENING.

SINCERELY,

SHAWN THOMAS

August 3, 2009
73 La Costa Dr.
Blackwood, NJ 08012

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640
Fax: 609.562.7983
Laura.dellolio@usar.army.mil

RE: 30-day public comment period for the BRAC Realignment Actions in Camden County, NJ

To whom it may concern:

I wish to oppose the construction of the proposed military facility on Cross Keys Road and would like to see such a facility built in a non-residential area. There are other non-residential, already tax-exempt properties that would offer a better fit for such a facility. The proposed facility would disrupt our neighborhood as well as depreciate our home values. We, the residents of Gloucester Township, do not want to hear drills and machinery during our weekend retreats in our backyards. We do not want our children's playground to be the backdrop for a parking lot or maintenance shop. Kindly look for an alternate site.

Thank you for taking the time to hear my voice.

Sincerely,

L. Thomas + Mary Vaccara

Tom and Mary Vaccara

Stockbridge-Munsee Tribal Historic Preservation Office

Sherry White - Tribal Historic Preservation Officer
W13447 Camp 14 Road
P.O. Box 70
Bowler, WI 54416

July 6, 2009

Laura Dell'Olio
Environmental/NEPA Specialist
99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ 08640

RE: Environmental Assessment for the Construction of an Armed Forces Reserve Center And Implementation of BRAC 05 Realignment Actions in Camden NJ

Dear Ms. Dell'Olio:

Thank you for contacting the Stockbridge-Munsee Tribe regarding the above referenced project. The Tribe is committed to protecting archaeological sites that are important to tribal heritage, culture and religion. Furthermore, the Tribe is particularly concerned with archaeological sites that may contain human burial remains and associated funerary objects.

As described in your correspondence, the proposed ground disturbing activity of this project is not in a region of archaeological interest to the Stockbridge-Munsee Tribe.

We appreciate your cooperation in notifying the Historic Preservation Office. Should you have any questions, feel free to contact me.

Sincerely,

Sherry White/gj

Sherry White,
Tribal Historical Preservation Officer

(715) 793-3970 *Email: sherry.white@mohican-nsn.gov*

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RESPONSES TO COMMENTS

Sheila Alexander
Letter dated - unknown

Comment #1: The commenter states her opposition to the construction of the proposed military facility on Cross Keys Road and explains that there are other non-residential, already tax-exempt properties that would offer a better fit for such a facility.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that.

The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #2: The commenter explains that the proposed facility would disrupt the neighborhood as well as depreciate the home values.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Additionally, please see the attached letter dated September 8, 2009 from the 99th Regional Support Command responding to your concerns.

Comment #3: The commenter states that she does not want to hear drills and machinery on weekends. The commenter also explains that she does not want her children's playground to be the backdrop for a parking lot maintenance yard.

Response to Comment: No outdoor military drills would be performed on site. Impacts to noise during operation of the facility would be negligible during the typical workday. During weekends a few vehicles would be moved from their storage location into the Organizational Maintenance Shop for minor routine maintenance (e.g. changing oil, tires etc) with minimal noise impacts. Noise during construction and operation of the facilities would meet all Township and Camden County noise regulations, but is expected to be minimal. The employee vehicle parking lot would be located near the street entrance and the military vehicle parking area would be located in the northeast portion of the property away from residences as much as possible. Landscaping around the maintenance shop and parking areas will help buffer the site visually. For security reasons the property boundary would be secured by fencing, thus preventing the opportunity for children to enter the property.

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

REPLY TO
ATTENTION OF

September 8, 2009

Sheila M. Alexander
62 Clement Dr.
Somerdale, New Jersey 08083

Dear Ms. Alexander:

We are in receipt of your letter to Laura Dell'Olio, the Environmental/NEPA Specialist assigned to the Proposed Cross Keys Road Army Reserve Center. We take seriously your concerns regarding possible depreciation to your residential neighborhood and understand that a residence is a large investment for an American household.

Please re-consider what is being proposed; the construction of a facility that is like a Community College Building. The proposed Army Reserve Center for Cross Keys Road will be approximately 50,000 feet of the latest state of the arts classroom/administrative office space. The maintenance facility will only be 4,000 additional feet and it will have 2 bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility and no heavy truck traffic is intended to be used at this center.

The site selected for Army Reserve Centers are intended to be good location for both the Army and the community. The Real Estate Division for the US Army Corps of Engineers has indicated that the Reserve Center may actually add value since the current zoning as commercial leaves open to a much less desirable occupant. Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve. Army Reserve Centers are designed with security and this affords a generous setback from the perimeter.

Please understand that at this time a site has not officially been chosen. Currently the EA comment and response document is being produced and will be mailed to those who provided official comments. Thank you again for participating and sharing your concerns.

Sincerely,

Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer

Congressman Robert Andrews on behalf of Mayor Cindy Rau-Hatton and Gloucester Township
2439 Rayburn House Office Building
Washington, D.C. 20515
Rob.andrews@mail.house.gov
Letter dated July 29, 2009

Comment #1: The commenter expresses concern that the current proposed site is strategically located for economic development and that placing the Training Center at this site would be an invaluable loss to the citizens of Gloucester Township.

The commenter suggests that other alternative sites be considered and notes that Mayor Rau-Hatton has proposed alternative sites that could be used to accommodate the proposed Training Center

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that.

The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Maureen Barra-Warner
813 Roosevelt Ave
Glendora, NJ 08029
E-mail dated August, 2009

Comment #1: The commenter states her opposition to the construction of the proposed military facility on Cross Keys Road and explains that there are other non-residential, already tax-exempt properties that would offer a better fit for such a facility.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that.

The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #2: The commenter explains that the proposed facility would disrupt the neighborhood as well as depreciate the home values.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #3: The commenter states that she does not want to hear drills and machinery on weekends. The commenter also explains that she does not want her children's playground to be the backdrop for a parking lot maintenance yard.

Response to Comment: No outdoor military drills would be performed on site. Impacts to noise during operation of the facility would be negligible during the typical workday. During weekends a few vehicles would be moved from their storage location into the Organizational Maintenance Shop for minor routine maintenance (e.g. changing oil, tires etc) with minimal noise impacts. Noise during construction and operation of the facilities would meet all Township and Camden County noise regulations, but is expected to be minimal. The employee vehicle parking lot would be located near the street entrance and the military vehicle parking area would be located in the northeast portion of the property away from residences as much as possible. Landscaping around the maintenance shop and parking areas will help buffer the site visually. For security reasons the property boundary would be secured by fencing, thus preventing the opportunity for children to enter the property.

Tina and Wayne Bridda
Letter dated July 22, 2009

Comment #1: The commenter expresses concern that the maps used in the Environmental Assessment (Figures 3-2, 4-2, and 4-7) are at least four years outdated and that they do not show the commenter's property, located at 948 Kearsley Road, Erial, NJ.

Response to Comment: It is noted in Section 3.2, which describes the 389 Cross Keys Road site that the site was recently cleared of trees and graded. Also in the EA, notes on Figures 3-2 and 4-2 acknowledge the fact that the site was recently cleared by the current land owner and that there is no recent aerial image that depicts existing cleared conditions of the site.

Comment #2: The commenter expresses concern that the new training facility will significantly negatively impact the calm, neighborhood environment, as well as insult home values.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional

square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #3: The commenter suggests that the estimated impacts to traffic and noise levels from the added 61 vehicles, 40 trailers, and 400 personnel from the new facility to be narrow and unrealistic.

The commenter explains that construction at the proposed site would heavily impact an already congested length of Cross Keys Road and that disrupting the flow of traffic with construction vehicles prior to the 4-lane expansion would definitely interfere with traffic patterns in the area. The commenter further explains that five of the homes on Kenwyck Court as well as the commenter's property, which is adjacent to Kenwyck Court, will be directly affected by the construction.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. Noise during the construction and operation of the facility will comply with the existing noise regulations for Camden County. During the operation of the facility, noise impacts are expected to

be minimal as this facility will operate much like a community college building and no heavy truck traffic is intended for this site.

Comment #4: The commenter expresses concern that the proposed facility would not fit visually with surrounding land uses. The commenter explains that the EA's identification of the project area as farmland is misleading. The commenter states that until 2007, the proposed project area was a thick, lush forest.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building and existing trees around the boundary of the property will be left in place to the greatest extent possible to provide visual buffering to the site. Additionally, military vehicles would be located on the northeast side of the site, away from residential areas, and landscaping will be used to visually buffer them and the Organizational Maintenance Shop. Given required minimum security stand-off distances and landscaping, the Army Reserve Center would not substantially degrade the visual character of this commercially zoned site.

Comment #5: The commenter explains that the EA's identification of the project area as farmland is misleading. The commenter states that until 2007, the proposed project area was a thick, lush forest.

Response to Comment: As indicated in the Current Land Use Figure (Figure 4-2) in Section 4.2 of the EA, only a small portion of the property is indicated to be agricultural land. As indicated in the footnote to Figure 4-2, it is recognized that the land was recently cleared of trees and graded by the current property owner. The land use for the proposed facility is zoned commercial. In terms of the baseline conditions, at the time the U.S. Army selected the site for potential purchase and construction of its Army Reserve Center (2008), the parcel had already been cleared of trees by the current owner and was zoned for commercial use. Thus the cleared nature of the site and the fact that it is zoned for commercial use is the baseline conditions used for the purposes of the analysis.

Comment #6: The commenter expresses concern that the surrounding wildlife will be impacted by the construction of the new training facilities. The commenter notes that bird habitat has already been impacted by the past clearing of the land and will be further impacted by the clearing that will ensue in

the future. The commenter explains that their property, as well as surrounding properties, is home to many foxes, box turtles, numerous worm snakes, and black rat snakes all of which will be negatively disrupted by the proposed construction.

Response to Comment: This site is zoned for commercial use and as discussed in the EA, given the existing cleared nature of the site the amount and diversity of wildlife on the site is limited. During construction, the Army will avoid clearing more trees to the greatest extent possible. While the limited existing wildlife would be impacted by the construction of the facility on the site, there is property adjacent to the site to the northeast and across Cross Keys Road to the south that provides additional habitat for species. After construction and landscaping, species adapted to human presence would likely return to the site, particularly common bird species. In addition, by letter received on October 28, 2009 from the NJ Department of Environmental Protection, Division of Fish and Wildlife they concurred with the Army's conclusion that the proposed facilities would not impact any state listed species.

Lisa Cowne
E-mail dated July 7, 2009

Comment #1: The commenter explains that the proposed site was not previously farm land, but instead forest that had been clear cut in 2007. The commenter expresses concern that due to the clear-cutting and the construction of the training center, the surrounding homes will have a very different environment with noise, pollution, and aesthetic changes.

Response to Comment: The EA notes that the property was recently cleared by the current land owner. While there will be temporary impacts to noise and other issues during construction of the facilities, all local noise ordinances etc will be complied with to minimize impacts. The site is zoned for commercial use and the proposed facility will be very much like a community college building with classroom and administrative space with no outdoor drilling activities. The site will also be landscaped to help minimize visual impacts from vehicles on site and only minor vehicle maintenance, such as changing tires, oil etc will be performed inside the Organizational Maintenance Shop minimizing noise impacts on-site.

Comment #2: The commenter expresses concern for the plant life and landscaping on the properties near the proposed site as well as nearby wildlife.

Response to Comment: This site is zoned for commercial use and as discussed in the EA, given the existing cleared nature of the site the amount and diversity of wildlife on the site is limited. During

construction, the Army will avoid clearing more trees to the greatest extent possible. While the limited existing wildlife would be impacted by the construction of the facility on the site, there is property adjacent to the site to the northeast and across Cross Keys Road to the south that provides additional habitat for species. After construction and landscaping, species adapted to human presence would likely return to the site, particularly common bird species. In addition, by letter received on October 28, 2009 from the NJ Department of Environmental Protection, Division of Fish and Wildlife they concurred with the Army's conclusion that the proposed facilities would not impact any state listed species.

Comment #3: The commenter questions the findings of no effect or no significant effect on pollution, noise and traffic to the local area.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. Noise during the construction and operation of the facility will comply with the existing noise regulations for Camden County. During the operation of the facility, noise impacts are expected to be minimal as this facility will operate much like a community college building and no heavy truck traffic is intended for this site. While all of the motorized vehicles to be stored on site have diesel engines, they are mostly just being stored on site, with only a few vehicles being moved into the Organizational Maintenance Shop on a weekend for routine minor maintenance (changing tires etc.) minimizing air pollution. Impacts on air quality would be temporary during the construction period and negligible during operation of the facility.

Comment #4: The commenter states that with increased paving from the new training facility the area will be more at risk for flooding.

The commenter further explains that increased water in the area, due to the paving of the adjacent field, will lead to an increase in mosquitoes and related health concerns.

Response to Comment: The proposed facilities will increase the amount of impervious area on the site. Potential solutions for stormwater management include stormwater management measures (e.g. oil water separators and stormwater detention pond(s)) that will treat all stormwater on site for quality and quantity. Any stormwater discharged off-site will meet all state and local regulatory and permit requirements. Development of the site will also be consistent with forthcoming Environmental Protection Agency and Department of Defense requirements implementing Section 438 of the Energy Independence and Security Act which requires federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies to control stormwater runoff.

Detention ponds allow water to reinfiltrate the ground, minimizing the amount of standing water that may act as breeding habit for mosquitoes.

Comment #5: The commenter explains that construction and ground rumblings by the equipment will affect the local residents' wells and that pollutants from construction will leak into underground water sources.

Response to Comment: Typical construction practices would not likely adversely impact ground wells in surrounding properties. All hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through private contracts and are not expected to impact the underground water sources. Standard best management practices (BMPs) will also be used during construction to minimize stormwater runoff, discharge of pollutants, and other potential impacts.

Comment #6: The commenter expresses concern about the "terrorist" potential of the new facility so close to residential properties, a Technical School and an elementary school about 2 miles away.

Response to Comment: Armed Forces Reserve Centers are not typically terrorist targets. However, regardless of the threat potential, standard security measures are required for all military buildings/installations including Reserve Centers. Security measures designed for the Reserve Center affords a generous setback from the perimeter fencing and area neighborhoods.

Comment #7: The commenter explains that property values have already declined and that will continue to decline as a result of the new training facility.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Lisa Cowne
E-mail dated July 13, 2009

Comment #1: The commenter questions the validity of the EA's findings that the proposed action will have no adverse effects on the quality of the natural or human environment and indicates that the findings are not correct.

Response to Comment: The Environmental Assessment (EA) does not reach a conclusion that there would be no adverse effects on the quality of the natural or human environment, just that the adverse effects would not be at a level where they *significantly effect* the natural or human environment. *Significance* is interpreted in the context of the relevant environment and for each human and environmental topic analyzed in the EA definitions are provided for the level of impacts that constitute significant or not-significant impacts. Based on the analysis in the EA using appropriate scientific analytical tools, and professional judgment and expertise, none of the adverse impacts analyzed for this project as indicated in the EA rose to the level of being significant.

Lisa Cowne
E-mail dated July 20, 2009

Comment #1: The commenter expresses concern that the surrounding residential properties will be devalued as a result of the proposed AFRC.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home

valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #2: The commenter states that it seems the Army has made no analysis of energy costs of the life cycle of the project vs. refitting existing buildings.

Response to Comment: The BRAC language for this project directs the Army to close the Nelson Brittin Army Reserve Center and acquire suitable land for the construction of new facilities. Because the BRAC language is law the Army must follow its directive for construction of a new facility.

Lisa Cowne
Letter dated August 25, 2009

Comment #1: The commenter requests information on how the community will be notified of the Army's decision.

Response to Comment: Please see attached response from the U.S. Army, 99th Regional Support Command dated September 8, 2009.

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

REPLY TO
ATTENTION OF

September 8, 2009

Dear Ms. Cowne:

We are in receipt of your letter to Laura Dell'Olio, the Environmental/NEPA Specialist assigned to the Proposed Cross Keys Road Army Reserve Center.

At this time, an addition meeting has not been planned. We will respond to comments received through the "Environmental Analysis (EA) comment and response process" in finalizing the EA. Those who provided comments will receive the EA comment and response document via mail or email.

Please understand that at this time a site has not officially been chosen. Currently the EA comment and response document is being produced and will be mailed upon finalization.

Thank you again for participating and sharing your concerns.

Sincerely,

Joseph H. Ledlow
Colonel, US Army Reserve
Regional Engineer

Lisa Cowne
Letter dated August 27, 2009

Comment #1: The commenter expresses concern that she, along with fellow township residents will lose tax revenues as a result of the construction of the proposed AFRC.

Response to Comment: The Army recognizes that for this commercially zoned site there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #2: The commenter notes that the EA was not available in hardcopy at the local Library and that residents did not know about the EA.

The commenter further states that only a select group of residents within 200 feet of the proposed site were notified by letter via USPS.

Response to Comment: As required by the National Environmental Policy Act and U.S. Army regulations, the Army published a Notice of Availability in a local newspaper, the Courier-Post describing the project and indicating that the document was available at three libraries, 2 of which were in the vicinity of the relocating units and one near the proposed project site. The Marie Fleche Memorial Library in Berlin, NJ was selected because of its proximity to the proposed site. Upon request to extend the public comment period, a second newspaper notice was published regarding the project and the Blackwood Rotary Library in Gloucester Township and the Winslow Township Branch Library were added as locations where the Environmental Assessment could be accessed. Typically for actions such as this, the Army notifies adjacent property abutters of the action via mail and the rest of the surrounding township(s) via a notice in the local newspaper as was done in this case.

Comment #3: The commenter explains that the EA incorrectly states “the site (389 Cross Keys Rd.) consists of approximately 11 acres of vacant agricultural land which has been used in the past for crops and livestock”. Instead, the commenter explains that the said area was wooded acreage that was cleared in the summer of 2007 and that there were no crops or roaming livestock.

Response to Comment: As indicated in the Current Land Use figure (Figure 4-2) in Section 4.2 of the EA, only a small portion of the property is indicated to be agricultural land and as noted in the EA it was used as a pig farm. The EA also indicates that the property is now zoned for commercial use. The EA does indicate that the property was formally forested and recently cleared in 2007 by the current property owner.

Comment #4: The commenter expresses concern that the proposed site would be built right next to the Vo-Tech School, where students will be prime targets for recruitment.

Response to Comment: The U.S. Army Reserve will not alter typical recruiting methods nor target specific demographics or schools within the area.

Comment #5: The commenter states that the impacts to land use on the site will not be limited to the scope of the site as the EA states.

Response to Comment: The proposed project site is zoned for commercial use, and is for sale as commercial property, which allows a facility of the nature that the U.S. Army is proposing to be constructed on it. The proposed project would be confined to the parcel of concern and would not alter the land use of any other parcel. The Land Use section, however, analyzes Camden County as the Region of Influence for the Land Use section.

Comment #6: The commenter states that at a public meeting on August 17, 2009, hosted by the U.S. Army Corps of Engineers, it was said that the project would bring jobs and business to the community; however the commenter points out that Section 4.2.2.2 states that this will not happen.

Response to Comment: Section 4.2.2.2 discusses long-term impacts to the community. The construction of a 364 person Army Reserve Center where personnel are not moving into the area will not result in demand for additional housing or businesses that provide goods and services. However, this doesn't mean that there won't be an economic benefit to the surrounding communities from the proposed project. As noted in Section 4.10 the majority of economic benefits will arise during the construction of the facility. Longer term, during the operation of the facility, economic benefits in other areas will result. Based on the existing economic measures of the region the benefits from the Army Reserve Center will not be major. Other areas that would see economic benefits from the Reserve Center are local hotels housing the reservists on the weekends, local food establishments, gas stations, and businesses supplying administrative supplies etc. for the new facilities.

Comment #7: The commenter expresses concern for the impacts to aesthetic and visual resources of the area, explaining that the EA is incorrect in stating that "implementing the proposed action at the preferred alternative site would not have a significant effect on aesthetics and visual resources".

Response to Comment: While the site would no longer be an open field, the proposed facility would be much like a community college building. Existing trees around the boundary of the property will be left in place to the greatest extent possible to provide some visual buffering to the site. Additionally, military vehicles would be located on the northeast side of the site, away from residential areas, and landscaping will be used to visually buffer them and the Organizational Maintenance Shop. Given required minimum stand-off distances and landscaping, the Army Reserve Center would not substantially degrade the visual character of the site.

Comment #8: The commenter states that the numbers in Section 4.4.1.2 seem to be incorrect. The commenter suggests that there is a difference between average high temperatures and yearly average. The commenter expresses concern that these numbers will affect air quality.

Response to Comment: The difference of average high temperature versus a yearly average would not affect the air quality analysis. The air quality analysis assumes that all construction would be done during the ozone season (warm, summer months) to assure a conservative analysis, instead of equally distributed throughout the year.

Comment #9: The commenter expresses concern for the ambient noise produced from the proposed action described in Section 4.5 especially during sleeping hours, as many area residents sleep during the day because they are night shift workers. The commenter further explains their concern over the noise from increased traffic due to the proposed action as well as noise during the weekend.

Response to Comment: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee vehicle parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational

Maintenance Shop for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances.

Comment #10: The commenter explains that there are already drainage problems in the area and that Section 4.7.1.1 incorrectly states that there "no known drainage concerns were noted".

Response to Comment: As referenced in the EA, based on the Army's site visit by engineering and environmental staff to investigate its potential for accommodating the proposed facilities, evidence of drainage concerns were not evident. The proposed facilities will increase the amount of impervious area on the site. While there may be existing drainage concerns as noted by the commenter, potential solutions for stormwater management include stormwater management measures (e.g. oil water separators and stormwater detention pond(s)) that will treat all stormwater on site for quality and quantity. Development of the site will also be consistent with forthcoming Environmental Protection Agency and Department of Defense requirements implementing Section 438 of the Energy Independence and Security Act which requires federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies to control stormwater runoff.

Comment #11: The commenter states that current residents rely on wells for drinking water and that they are concerned that the affects to groundwater discussed in Section 4.7.1.2 will affect their well water.

Response to Comment: During construction standard best management practices will be implemented to minimize any impacts to groundwater. During the operation of the facilities all hazardous materials and potential contaminants such as oil, used oil, anti-freeze, etc. would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for these materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through private contracts and are not expected to impact the underground water sources. Items such as floor drains running through oil water separators would be included in the design of the Organizational Maintenance Shop to prevent any contaminants from entering storm or ground water.

Comment #12: The commenter expresses concern regarding the lack of detail included in Section 4.7.2.2 regarding stormwater management. The commenter further explains her concerns about flooding and water pollution from the proposed action.

Response to Comment: All hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for

hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. The final designs of the stormwater controls to be included for the project will be completed during the final design phase of this design/build project and therefore were not available for this Environmental Assessment. However, while there may be existing drainage concerns, potential solutions for stormwater management include stormwater management measures (e.g. stormwater detention pond(s)) that will treat all stormwater on site for quality and quantity. Development of the site will also be consistent with forthcoming Environmental Protection Agency and Department of Defense requirements implementing Section 438 of the Energy Independence and Security Act which requires federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies to control stormwater runoff.

Comment #13: The commenter asks how many trees will be cut down as stated in Section 4.8.2.2. The commenter also expressed concern that redheaded woodpeckers were not included in this section because they have been spotted by neighbors and would be affected by the removal of trees.

Response to Comment: While the red-headed woodpecker is listed as *threatened* in the state of NJ (no federal listing), consultation with the NJ Department of Environmental Protection Natural Heritage Program did not indicate any occurrences of this species on the proposed project site. The commenter does not indicate when the local residents may have spotted the species, but the preferred habitat for this species is open woods that contain dead or dying trees and sparse undergrowth. As the commenter has noted earlier, the site was cleared of trees in 2007 by the current land owner. Given the current open field nature of the site, it no longer contains preferred habitat for this species and is unlikely to currently occupy the site. The Army would preserve as many of the remaining trees as possible given the design of the facilities.

Comment #14: The commenter expresses concern that not enough testing for prehistoric artifacts was done as described in Section 4.9.2.2.

Response to Comment: A Phase 1 Cultural Resources Study was performed on the preferred site following standard NJ protocols. On April 10, 2009 the U.S. Army sent a coordination letter to the NJ Historic Preservation Office indicating that two prehistoric archeological sites were identified, one on the preferred site and one on the alternative site, but that only the archeological site on the alternative site (Erial Road) was being recommended for listing on the National Register of Historic Places. Follow-up correspondence occurred on May 19, 2009. By letter dated August 20, 2009 the NJ Historic Preservation Office indicated that they concurred with the cultural resource findings for the sites and provided a ***no***

adverse affect determination for the preferred site and a ***conditional no adverse affect*** determination for the alternative site provided that the artifacts are curated in accordance with 36 CFR Part 79. The artifacts from each site were curated and are being housed by the 99th Regional Support Command at Fort Dix, NJ.

Comment #15: The commenter expresses concern for the economic state of the area and the surrounding home values as discussed in Section 4.10.1. The commenter asks whether the proposed action would bring new business to the area, new resident military families, and more children to the overcrowded area schools.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

The new reserve center will have 17 new full-time employees. Given the proximity to the existing reserve center that will be relocating to this site, it is very unlikely that any of these employees will move their residence to the local area. In addition, reservists typically do not move to the local area where they are assigned to drill for one weekend a month, as they typically have full time jobs where they currently live. As indicated in Section 4.10, the majority of economic benefits will arise during the construction of the facility. Longer term, during the operation of the facility, economic benefits in other areas will result; however, based on the existing economic measures of the region the benefits from the Army Reserve Center will not be major. Other areas that would see economic benefits from the reserve center are local

hotels housing the reservists on the weekends, local food establishments, gas stations, and businesses supplying administrative supplies etc. for the new facilities.

Comment #16: The commenter expresses concern for the physical and emotional well being of local children as discussed in Section 4.10.1.4. The commenter explains that they will be exposed to decreased air quality, suffer the effects and worry of the perceived threat that the military installation represents for those old enough to remember 9-11, and that children's outdoor playing will be affected by traffic.

Response to Comment: During construction activities impacts on air quality would be minimal and short-term, lasting only during the construction period. Long-term air quality impacts would not be significant during the operation of the facility as demonstrated in the EA analysis. While all of the motorized military vehicles on site would be diesel vehicles, only a few would be moved from their storage area into the Organizational Maintenance Shop during weekend operations for minor routine maintenance. No heavy truck traffic is intended for this site; therefore, impacts to air quality from diesel engines would be minimal. Traffic would be confined to the well traveled Cross Keys Road which should not impact children playing outdoors. The traffic analysis confirmed that there would be no significant impact to traffic as a result of this project.

Comment #17: The commenter expresses concern that the proposed action will cause backups and increased traffic at the intersection of Kearsley Road and Cross Keys Road as discussed in Section 4.11.1.1. The commenter describes Cross Keys Rd as already in ill repair and explains that increased trips from the proposed action will impact traffic in the area. The commenter explains that Section 4.11.1.1 states that "no speed limit is posted for this section of Cross Keys Rd", but that in fact the speed limit is 45 mph on Cross Keys Rd.

Response to Comment: Thank you for the correction that the posted speed limit is 45 mph on Cross Keys Road. The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the

Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. During the operation of the facility no heavy truck traffic is intended for this site.

Comment #18: The commenter asks if the sewer lines and services are responsible for carrying away the maintenance wastes as discussed in Section 4.12.1.1.

Response to Comment: The proposed AFRC would tie into municipal lines that are located in close proximity to the proposed site and would meet all regulatory requirements for discharging to these systems. All hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through the Defense Reuse and Marketing Organization.

Comment #19: The commenter asks how the transformer adjacent to the site, if it contains PCBs, would be handled as discussed in Section 4.13.1.3.

Response to Comment: As described in the EA, if relocation is required for the pole containing the transformer; it would be evaluated for PCBs and would be addressed as specified in the appropriate regulatory requirements before initiating any disturbance. If PCBs are discovered, regulatory requirements would be followed during removal, transport, and disposal, as determined by each appropriate regulatory agency.

Lisa Cowne
Letter dated – unknown

Comment #1: The commenter expresses concern that she would not be able to resell her house if the Reserve Center were constructed on the proposed site.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional

square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #2: The commenter notes that there will be no way to shield their home from the view of the facilities including 61 vehicles and 40 trailers.

Response to Comment: Existing trees around the boundary of the property will be left in place to the greatest extent possible to provide some visual buffering to the site. Additionally, military vehicles would be located on the northeast side of the site, away from residential areas as much as possible with landscaping that will be help to visually buffer them and the Organizational Maintenance Shop. Required minimum stand-off distances from the property boundary and landscaping will help to buffer the site visually.

Comment #3: The commenter urges the Army to extend the decision making deadline and to work with the Township to find another site for the facility.

Response to Comment: In light of concerns brought up during the public review period for the Environmental Assessment, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Paulette Crawford
Letter dated July 31, 2009

Comment #1: The commenter expresses concern about the effects the proposed action will have on the areas home values.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Kelly Davis, Office of Environmental Review
NJ Division of Fish and Wildlife
P.O. Box 400
Trenton, NJ 08625-0400
Letter dated August, 2009

Comment #1: The commenter notes that the DFW has found the area at 389 Cross Keys Road in Gloucester Township, Camden County, NJ mapped for the State listed T/E species, Coopers Hawk, and Species of Concern, Eastern Box Turtle, Eastern King Snake and Great Blur Heron.

The commenter also requests the GIS shape files of the area or areas expected to be impacted in order to agree or disagree with the Draft FONSI.

Response to Comment: Prior consultation with the NJDEP Natural Heritage Program indicated that the four species mentioned in the DFW letter had records of occurring on the proposed site. The EA therefore analyzed the potential impact to these four species and concluded that there would be no significant impact to the species or their habitat. The Army provided the project boundary GIS shape files per request on August 28, 2009. By letter received October 28, 2009, the DFW concurred with the Army's conclusion.

Linda DeWitt
E-mail dated August 18, 2009

Comment #1: The commenter expresses concern about the impact of the proposed actions on his/her well water and drainage.

Response to Comment: During construction standard best management practices will be implemented to minimize any impacts to groundwater. During the operation of the facilities all hazardous materials and potential contaminants such as oil, used oil, anti-freeze etc would be handled and stored in compliance

with all federal, state, and local laws and regulations governing the use of and reporting requirements for these materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through private contracts and are not expected to impact the underground water sources. Items such as floor drains running through oil water separators would be included in the design of the Organizational Maintenance Shop to prevent any contaminants from entering storm or ground water.

The proposed facilities will increase the amount of impervious area on the site. Potential solutions for stormwater management include stormwater management measures (e.g. oil water separators and stormwater detention pond(s)) that will treat all stormwater on site for quality and quantity. Any stormwater discharged off-site will meet all state and local regulatory and permit requirements. Development of the site will also be consistent with forthcoming Environmental Protection Agency and Department of Defense requirements implementing Section 438 of the Energy Independence and Security Act which requires federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies to control stormwater runoff.

Comment #2: The commenter asks where exactly the fence line for the proposed training center would be located on or near her property line. The commenter also requested that the six trees directly behind his/her property on the project site not be cut down.

Response to Comment: The exact location of the security fence erected around the facility will be determined during the final design layout for the facility and will meet the required minimum security stand-off distances required around military facilities. The Army will allow as many trees to remain standing as is feasible given the final facility design/layout.

Comment #3: The commenter notes that she would rather see an Army Reserve Center located on the property than a shopping mall and that a shopping mall would generate a lot more traffic congestion than the Reserve Center.

Response to Comment: Thank you for your comment on the proposed project.

Kandee Dias
Letter dated August 6, 2009

Comment #1: The commenter states her opposition to the construction of the proposed military facility on Cross Keys Road and explains that there are other non-residential, already tax-exempt properties that would offer a better fit for such a facility.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that.

The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #2: The commenter explains that the proposed facility would disrupt the neighborhood as well as depreciate the home values.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #3: The commenter states that she does not want to hear drills and machinery on weekends. The commenter also explains that she does not want her children's playground to be the backdrop for a parking lot maintenance yard.

Response to Comment: No outdoor military drills would be performed on site. Impacts to noise during operation of the facility would be negligible during the typical workday. During weekends a few vehicles would be moved from their storage location into the Organizational Maintenance Shop for minor routine maintenance (e.g. changing oil, tires etc) with minimal noise impacts. Noise during construction and operation of the facilities would meet all Township and Camden County noise regulations, but is expected to be minimal. The employee parking lot would be located near the street entrance and the military vehicle parking area would be located in the northeast portion of the property away from residences as much as possible. Landscaping around the maintenance shop and parking areas will help buffer the site visually. For security reasons the property boundary would be secured by fencing, thus preventing the opportunity for children to enter the property.

Frederick Doolittle
Gloucester Township Economic Development Corporation
Letter dated – unknown

Comment #1: The commenter indicates that he is opposed to locating the facilities at the proposed Cross Keys Road site and taking it out of the inventory of tax ratable property and recommends that the Army consider working with the EDC to develop the project on Tax Exempt properties in the Township.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that.

The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

James Forte, Vice President
Gloucester Township Economic Development Corp.
E-mail dated August 30, 2009

Comment #1: The commenter comments that the Cross Keys Road site is located along an active commercial growth corridor and is better suited for Retail Commercial Use which would provide a much needed Tax Revenue source for the Township, and notes that the Gloucester Township Economic Development Corporation would be glad to work in conjunction with the Army to select a Tax Exempt site.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that.

The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Sandi Frehmel-Heim
E-mail dated July 28, 2009

Comment #1: The commenter explains that she would be bothered by the added traffic from the proposed action.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. During the operation of the facility no heavy truck traffic is intended for this site.

Comment #2: The commenter indicates she is not opposed to the Reserve Center, but believes there are more suitable sites, including the former Nike base on Freedom Road.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. During this site selection process the Army spoke with various entities in the Camden County Government. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that. The Nike base on Freedom Road was not available for purchase during the initial site selection process.

During the public review period the Army has received a number of comments raising concern about the selection of the proposed site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The

Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Joseph Gallagher, Jr., MPA
Town Administrator
Township of Winslow
Letter dated August 24, 2009

Comment #1: The commenter expresses concern that the local officials in Gloucester Township and Winslow Township were never contacted, nor consulted regarding their input for the site selection and the training facility.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. During this site selection process the Army spoke with various entities in the Camden County Government. Through the Army's site selection process carried out according to Army Regulation (AR) 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria that were available for purchase at time that.

During the public review period the Army has received a number of comments raising concern about the selection of the proposed site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties. In addition, the Army met with the Townships during the public comment period in the month of July, 2009.

Comment #2: The commenter notes that the town would be losing a tax ratable property that is zoned commercial if the Army were to select the Erial Road location.

Response to Comment: The Army recognizes that for this commercially zoned site there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for

the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #3: The commenter notes that residents surrounding the proposed site were never notified prior to the issuing of the Environmental Assessment.

Response to Comment: The Army sent letters regarding the Environmental Assessment to those owners of property that abut the parcel of property under consideration for construction of the Armed Forces Reserve Center. While the Base Closure and Realignment legislation was signed into law in 2005, it was not until 2008 that the Army began looking into selecting a site for this project. The Army followed National Environmental Policy Act and Army regulations by completing an Environmental Assessment for the proposed action and then providing it to the public for their comment/input over the course of a thirty day period.

Comment #4: The commenter notes that there are possible wetlands issues on the Erial Road property under consideration.

Response to Comment: Should the Army select the Erial Road site for construction of the AFRC, as indicated in Section 4.7.2.3 of the Environmental Assessment, the Army would not include any wetlands, or any portion of the unnamed tributary to the Great Egg Harbor River in its purchase of approximately 10 acres. However, a determination would need to be made as to what state classification and associated buffer/transition area applies to the forested wetlands in the vicinity of the approximately 10 acres to be purchased. All proposed construction activities would try to avoid to the maximum extent possible any wetland buffer/transition area. However, should the proposed project encroach upon any designated wetland buffer/transition area, the Army would be required to undergo the New Jersey Freshwater Wetland Permit process to obtain all applicable permits necessary.

Comment #5: The commenter notes that there is no sewer connections curbside of the Erial Road project site and notes that there is a lack of sewer capacity because of a sewer moratorium in the area.

Response to Comment: The EA has been revised to indicate that there is a sewer moratorium and a lack of sewer capacity at the Erial Road alternative site. The EA also indicates that if this site is selected by the Army, the AFRC facility sewer lines would still be constructed for tie in, but would not be connected to the Township sanitary sewer infrastructure until the moratorium and sufficient capacity was available. In the interim, the Army would construct a sanitary sewer treatment facility on-site that would meet all

applicable state and local regulations so as not to impact ground or surface waters or the existing Winslow Township sanitary sewer system.

Comment #6: The commenter requests the Army reconsider the Erial Road site selection and requests that the Army meets with the officials of Winslow and/or Gloucester Townships for assistance in selecting the best site for the proposed facility.

Response to Comment: During the public review period the Army received a number of comments raising concern about the selection of the proposed site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties. In addition, during the public comment period on the EA, the Army met with the Townships during the month of July, 2009.

Nancy Hawn
E-mail dated August 17, 2009

Comment #1: The commenter expresses concerns regarding the significant environmental impact and the impact to home values related to the impact of the new training facility.

Response to Comment: The Environmental Assessment (EA) does not reach a conclusion that there would be no adverse effects on the quality of the natural or human environment, just that the adverse effects would not be at a level where they *significantly effect* the natural or human environment. *Significance* is interpreted in the context of the relevant environment and for each human and environmental topic analyzed in the EA definitions are provided for the level of impacts that constitute significant or not-significant impacts. Based on the analysis in the EA using appropriate scientific analytical tools, and professional judgment and expertise, none of the adverse impacts analyzed for this project as indicated in the EA rose to the level of being significant.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #2: The commenter also questioned if there are plans in place to handle the potential terrorist situation.

Response to Comment: Armed Forces Reserve Centers are not typically terrorist targets. However, regardless of the threat potential, standard security measures are required for all military buildings/installations including Reserve Centers. Security measures designed for the Reserve Center affords a generous setback from the perimeter fencing and area neighborhoods.

Denise Horgan
E-mail dated July 13, 2009

Comment #1: The commenter states her opposition to the construction of this site, stating that she has well water and is raising his/her family in the area.

Response to Comment: Typical construction practices would not impact wells. During construction standard best management practices would be used to prevent impacts from stormwater or from contaminants entering the groundwater. All hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory through private contracts requirements through private contracts and are not expected to impact the underground water sources.

Comment #2: The commenter explains that the area has already had the trees removed, which has displaced the wildlife.

Response to Comment: As discussed in the EA, given the existing cleared nature of the site the amount and diversity of wildlife on the site is limited. During construction, the Army will avoid clearing more trees to the greatest extent possible. While the limited existing wildlife would be impacted by the construction of the facility on the site, there is property adjacent to the site to the northeast and across Cross Keys Road to the south that provides additional habitat for species. After construction and landscaping, species adapted to human presence would likely return to the site, particularly common bird species.

Comment #3: The commenter explains that the area is a quiet neighborhood that is no place for this site. The commenter also states her concern for her family's health and well being if this site were to be built.

Response to Comment: Impacts to noise during operation of the facility would be negligible during the typical workday. Weekday noise would only occur during the construction period and would meet all Township and Camden County noise regulations. Health and well being of residents would not be affected. All stormwater generated on-site from the proposed facilities would be treated for both quality and quantity on-site and any stormwater discharged off-site will meet all state and local regulatory and permit requirements. The proposed OMS design would include floor drains that convey flow through oil-water separators prior to discharging to either the sanitary sewer system or stormwater management facilities, thus minimizing the likelihood of pollutants entering the stormwater.

James Kibelstis
E-mail dated August 12, 2009

Comment #1: The commenter asks if the local fire districts personnel require special training related to the materials being stored at the facility, for example hazardous materials, explosives, etc…

Response to Comment: There will be no special materials used or stored on site that would require special training by local fire districts. No explosives or ammunition would be stored on site. Only routine maintenance would be performed on vehicles such as changing oil, antifreeze, tires etc. and would not involve any special materials.

Comment #2: The commenter asks how many fire hydrants will be located within the boundaries of the location.

Response to Comment: No fire hydrants will be located within the boundary of the site.

Comment #3: The commenter asks if the facility will be subject to fire inspections by the local fire district.

Response to Comment: Yes, the facility will be in accordance with all local fire and building code standards and will be subject to fire inspections.

Deana Korczynski
E-mail dated July 28, 2009

Comment #1: The commenter questions why all of the residents in the area of the proposed site did not receive notice from the Army describing the project. The commenter states that the Mayor provided a copy of the letter to all the residents near the proposed site. The commenter also asks why the letter is dated June 30, 2009, when the proposed construction has been in the planning stage since 2005.

Response to Comment: Typically for actions such as this, the Army notifies adjacent property abutters of the action via mail and the rest of the surrounding township(s) via a notice in the local newspaper as was done in this case. While the Base Closure and Realignment legislation was signed into law in 2005, it was not until 2008 that the Army began looking into selecting a site for this project. The Army followed National Environmental Policy Act and Army regulations by completing a draft Environmental Assessment for the proposed action and then providing it to the public for their comment/input over the course of a thirty day period. The Army mailed letters to owners of property abutting the proposed project site on June 30, 2009 and placed a notice in the Courier-Post on July 2 and July 3, 2009 announcing the 30 day public comment period and indicating where copies of the Environmental Assessment could be obtained for review.

Comment #2: The commenter explains that the proposed area is a residential area and that this project will not help the resale value of the area's homes.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Joseph Leckerman
E-mail dated July 28, 2009

Comment #1: The commenter explains that the area is a growing residential community that would be opposed to the noise from the military equipment accompanying the proposed center.

Response to Comment: The site would be consistent with Gloucester Township zoning for commercial development and there would be no military equipment other than 61 wheeled vehicles and 40 trailers. No tracked vehicles, airplanes or helicopters would be associated with this facility. No outdoor military drills will be performed on-site. Impacts to noise during operation of the facility would be negligible during the typical workday. During weekends a few vehicles would be moved from their storage location into the Organizational Maintenance Shop for minor routine maintenance (e.g. changing oil, tires etc) with minimal noise impacts. Noise during construction and operation of the facilities would meet all Township and Camden County noise regulations, but is expected to be minimal. The employee parking lot would be located near the street entrance and the military vehicle parking area would be located in the northeast portion of the property away from residences as much as possible.

Comment #2: The commenter questions why he just received written notification of the project on July 28, 2009 and not a month earlier.

Response to Comment: While the Base Closure and Realignment legislation was signed into law in 2005, it was not until 2008 that the Army began looking into selecting a site for this project. The Army followed National Environmental Policy Act and Army regulations by completing a draft Environmental Assessment for the proposed action and then providing it to the public for their comment/input over the course of a thirty day period. The Army mailed letters to owners of property abutting the proposed project site on June 30, 2009 and placed a notice in the Courier-Post on July 2 and July 3, 2009 announcing the 30 day public comment period and indicating where copies of the Environmental Assessment could be obtained for review. It is the Army's understanding that the Mayor of Gloucester Township then mailed letters to additional township residents later in July notifying them of the project. It is the Army's assumption that it was the Mayor's letter that the commenter received on July 28, 2009.

Comment #3: The commenter voiced his displeasure with the Army selecting the Cross Keys Road site for the proposed Reserve Center.

Response to Comment: Thank you for your comment on the proposed action. In light of concerns received during the public comment period regarding the selected sites, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Joe and Diane Lynch
E-mail dated July 29, 2009

Comment #1: The commenter explains that the proposed area is too crowded and that traffic is already a problem with Cross Keys Road and Kearsley Road both one lane roads and requested that the Army select a location that is more remote and where traffic will not be an issue to anyone.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. During the operation of the facility no heavy truck traffic is intended for this site.

Amy Mallonee
Letter dated August, 2009

Comment #1: The commenter states her opposition to the construction of the proposed military facility on Cross Keys Road and explains that there are other non-residential, already tax-exempt properties that would offer a better fit for such a facility.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the site selection process the Cross Keys Road and Erial Road sites were the two sites that were available for purchase at that time that best met the Army's needs and site selection criteria.

Comment #2: The commenter explains that the proposed facility would disrupt the neighborhood as well as depreciate the home values.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #3: The commenter states that she does not want to hear drills and machinery on weekends. The commenter also explains that she does not want her children's playground to be the backdrop for a parking lot maintenance yard.

Response to Comment: No outdoor military drills would be performed on site. Impacts to noise during operation of the facility would be negligible during the typical workday. During weekends a few vehicles would be moved from their storage location into the Organizational Maintenance Shop for minor routine maintenance (e.g. changing oil, tires etc) with minimal noise impacts. Noise during construction and operation of the facilities would meet all Township and Camden County noise regulations, but is expected to be minimal. The employee vehicle parking lot would be located near the street entrance and the military vehicle parking area would be located in the northeast portion of the property away from

residences as much as possible. Landscaping around the maintenance shop and parking areas will help buffer the site visually. For security reasons the property boundary would be secured by fencing, thus preventing the opportunity for children to enter the property.

Mayor Cindy Rau-Hatton, Gloucester Township
Letter dated July 27, 2009

Comment #1: The commenter requests an extension of the 30 day public comment period on the EA and Draft FNSI. The commenter requests the public comment period be extended by an additional 30 days and should have a public hearing at the Municipal building. This hearing should be advertised by an ad (in addition to a legal advertisement) and give the Township the opportunity to place it on the Public Access Channel and Township website.

Response to Comment: The comment period was extended for 30 days through August 30, 2009 and a public meeting was held in Gloucester Township on August 17, 2009 which was noticed in the local newspaper.

Comment #2: The commenter notes that they (the Township Mayor and Council) received no formal correspondence until the letter from the Louis Berger Group of Rhode Island, dated June 30, 2009 and received on July 6, 2009. The commenter further explained that no detailed plans were submitted for review to the Planning Board or Township officials.

Response to Comment: While the Army did not coordinate directly with Gloucester Township prior to the public review period for the EA, during this site selection process the Army did speak with various entities in the Camden County Government. This is a design/build project and during the EA process only preliminary designs are developed. Further coordination with local officials would be on-going, if the parcel is selected for purchase. During the public review of the EA, the Army also had several meetings with the Townships during the month of July, 2009.

Comment #3: The commenter notes that the EA instructed residents to find a copy of the EA at libraries located in Berlin and Pennsauken. The commenter explains that these libraries are not in the Township and are quite a distance from Gloucester Township. The commenter further explains that the Burlington Library is not even located in Camden County. The commenter states that these three libraries are inconvenient to the residents, especially considering there is a library within their community.

Response to Comment: As required by the National Environmental Policy Act and Army regulations, the Army published a Notice of Availability in a local newspaper, the Courier-Post, describing the project

and indicating that the document was available at three libraries, 2 of which were in the vicinity of the relocating units and one near the proposed project site. The Marie Fleche Memorial Library in Berlin, NJ was selected because of its proximity to the proposed site. Upon request to extend the public comment period, a second newspaper notice was published regarding the project and the Blackwood Rotary Library in Gloucester Township and the Winslow Township Branch Library were added as locations where the Environmental Assessment could be accessed.

Comment #4: The commenter notes that Congressman Robert Andrews, a senior member of the Armed Services Committee was not notified. The commenter states that residents should not be expected to download a 216 page document. The commenter states that the residents and the Township government were not given sufficient time to review the information. The information was not located within the Township border for residents to review.

Response to Comment: During the public comment period Congressman Andrews coordinated with the Army Corps Headquarters in Washington, DC by letter dated July 29, 2009 and was involved in ongoing discussions in trying to identify additional sites for the Army to consider for implementing the Proposed Action. In compliance with the Reduction in Paperwork Act that federal agencies must follow, electronic versions of documents are provided as much as possible. Therefore, downloading the EA from the Army website was one means of reviewing the document. Individuals may always request a hard paper copy be mailed to them if they can't download the electronic version. The EA was placed in the Marie Fleche Memorial Library in Berlin, NJ due to the library' proximity to the proposed site. As required by the National Environmental Policy Act and Army regulations, the EA and Finding of No Significant Impact were made available for public review for 30 days. To accommodate the public's request for more time to review the document, the Army extended the public comment period for another 30 days and placed the documents in additional local libraries within the boundaries of Gloucester and Winslow Townships during this extended comment period.

Mayor Cindy Rau-Hatton, Gloucester Township
Letter dated July 27, 2009

Comment #1: The Township Council of the Township of Gloucester made a resolution indicating its opposition to the proposed action and resolved that the Army extend the public comment period for 45 days and hold an open public meeting. In addition, they resolved that the Army work with the township Mayor and Council to identify a more suitable location for facility.

Response to Comment: The Army is in receipt of the resolution. The comment period was extended for 30 days until August 30, 2009 and a public meeting was held in Gloucester Township on August 17, 2009. In light of public concerns about the sites selected for the proposed action the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Mayor Cindy Rau-Hatton, Gloucester Township
Letter dated August 27, 2009

Comment #1: The commenter notes that they (the Township Mayor and Council) received no formal correspondence until the letter from the Louis Berger Group of Rhode Island dated June 30, 2009 and received on July 6, 2009. The commenter further explained that no detailed plans were submitted for review to the Planning Board or Township officials.

Response to Comment: As required by the National Environmental Policy Act and Army regulations, the Army published a Notice of Availability in a local newspaper, the Courier-Post, describing the project and indicating that the document was available for public review during a 30 day comment period at three libraries, 2 of which were in the vicinity of the relocating units and one near the proposed project site. The Environmental Assessment was made available to the public for review as soon as it was completed. This is a design/build project and during the EA process only preliminary designs are developed. Further coordination with local officials would be on-going, if the parcel is selected for purchase.

Comment #2: The commenter notes that the EA instructed residents to find a copy of the EA at libraries located in Berlin and Pennsauken. The commenter explains that these libraries are not in the Township and are quite a distance from Gloucester Township. The commenter further explains that the Burlington Library is not even located in Camden County. The commenter states that these three libraries are inconvenient to the residents, especially considering there is a library within their community.

Response to Comment: As required by the National Environmental Policy Act and U.S. Army regulations, the Army published a Notice of Availability in a local newspaper, the Courier-Post, describing the project and indicating that the document was available at three libraries, 2 of which were in the vicinity of the relocating units and one near the proposed project site. The Marie Fleche Memorial Library in Berlin, NJ was selected because of its proximity to the proposed site. Upon request to extend the public comment period, a second newspaper notice was published regarding the project and the

Blackwood Rotary Library in Gloucester Township and the Winslow Township Branch Library were added as locations within the two townships where the Environmental Assessment could be accessed.

Comment #3: The commenter states that the Army did not establish a partnership with Township Officials and residents to find the proper home for the Center and to have optimal public participation.

Response to Comment: While the Army did not coordinate directly with Gloucester Township prior to the public review period for the EA, during the site selection process the Army did speak with various entities in the Camden County Government. During the public review of the EA, the Army also had several meetings with the Townships during the month of July, 2009.

Comment #3: The commenter notes that the proposed site, located on the Berlin-Cross Keys corridor, was zoned to highway commercial in the 1998 revision of the Gloucester Township Master Plan in order to promote and establish commercial tax ratable. The commenter also notes that according to Phil Rowan, the Township's economic consultant, the property has an estimated commercial value of $26 million and could generate $715,000 in taxes for the two school systems, Camden County, Fire District and local (Township) taxes.

Response to Comment: The Army recognizes that for this commercially zoned site there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process.

Comment #4: The commenter suggests that other sites be considered. The commenter notes that Gloucester Township contains many existing properties that are already tax-exempt. The commenter also notes that Lakeland is the most feasible site.

Response to Comment: During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

During the initial site selection process in 2008, the Army vetted a total of 12 sites that were known to be available for purchase at that time; which was one of the selection criteria that parcels needed to meet in

order to be considered as a potentially viable site. At the time of the site selection process the Lakeland site was not on the market for sale.

Comment #5: The commenter explains that Gloucester Township is 24.5 square miles with a population of 68,000 people, and 85% residential. The commenter also notes that the EA does not address the impact to the surrounding neighborhood and quality of life issues.

Response to Comment: The EA analyzed a number of impact topics several of which address quality of life issues for example; Aesthetics/Visual Resources, Air Quality, Noise, Socioeconomics (including demographics, environmental justice, and protection of children), and Transportation.

Comment #6: The commenter notes that in government it is paramount to have an open and public process, where all interested parties can participate.

Response to Comment: The Army followed NEPA and Army regulations for involving the public by providing the EA, once it was completed, to the public for a 30 day comment period. Upon request, the Army then extended that comment period for 30 days and held a public meeting to hear comments that the public has on the project.

Comment #7: The commenter requests that the Army establish a committee which would include Gloucester Township, Winslow Township and Camden County in order to form a partnership in selecting the best and appropriate site for the center.

Response to Comment: In light of public concerns and further dialogue between Army officials and the local government, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Michael and Michelle McGinness
Letter dated June 26, 2009

Comment #1: The commenter has concern there will be an increase in traffic congestion.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower

mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. During the operation of the facility no heavy truck traffic is intended for this site.

Comment #2: The commenter has concern there will be an increase in noise level.

Response to Comment: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances.

Comment #3: The commenter notes that this will depreciate the value of area homes.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Maureen McLaughlin
Email dated August 30, 2009

Comment #1: The commenter notes that while she welcomes the military she does not prefer it to be located at the Cross Keys Road site as it would remove it as a tax ratable property.

Response to Comment: The Army recognizes that for this commercially zoned site there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #2: Given the number of people in the township that do not want the proposed action to be located at the Cross Keys Road site, the commenter requests that the decision making process be extended for one year to allow the Township Officials to work with the Army to select a more suitable site.

Response to Comment: In light of concerns brought up during the public review period for the Environmental Assessment, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Francis Mellace
E-mail dated August 6, 2009

Comment #1: The commenter notes that he would welcome the military to the proposed site.

Response to Comment: Thank you for your comment on the proposed project.

Francis Mellace
E-mail dated August 6, 2009

Comment #1: The commenter indicates his general support for the project.

Response to Comment: Thank you for your comment.

Francis Mellace
E-mail dated August 12, 2009

Comment #1: The commenter provides his general support for the project.

Response to Comment: Thank you for your comment on the proposed project.

Francis Mellace
E-mail dated August 14, 2009

Comment #1: The commenter requests information regarding the scheduling of the meeting that occurred October 20, 2006 with Mayor Cindy Rau Hatton and John Custodio Flew from Timbercreek High School to Fort Dix to tour the facility with some of the local ROTC children. The commenter also asks what the purpose of the visit and what transpired during the visit including the type of tour, what was toured, and if there were any preliminary conversations at that time as to the possibility of Gloucester Township being chosen as a potential site for this proposed new base.

Response to Comment: The Mayor's tour of Fort Dix occurred several years ago, as the commenter notes, prior to the beginning of the Army's site selection process and was not associated with the current proposed project. It is suggested that the commenter contact the Mayor's office to obtain the desired information.

Comment #2: The commenter requests that all correspondence with any Gloucester Township officials regarding the proposed project in Gloucester Township be forwarded to them, including all e-mails and written letters sent and received with proof of delivery receipts if available.

Response to Comment: The Army's public affairs officer has indicated that the Army cannot release the letters at this time. See attached responding email from Laura Dell'Olio, USAR 99th RSC dated August 17, 2009. Additionally, please see the attached email correspondence dated August 17, 2009 from the 99th Regional Support Command responding to your request.

-----Original Message-----
From: Dellolio, Laura A CTR CTR USAR 99TH RRC -NA-
Sent: Monday, August 17, 2009 9:47 AM
To: 'Webpack@aol.com'
Subject: RE: Gloucester Township Military Facility

Frank,

Our public affairs officer has indicated that we cannot release the letters at this time. For your information, we have received letters from the City Council, Mayor, and Congressman Andrews (as well as dozens of individuals). While we believe this information to be available to the public, we cannot guarantee that they wish this correspondence to be made available public.

I know this doesn’t help you. Perhaps you can contact their offices directly. Thank you for your support and interest.

Thank you,

Laura Dell'Olio
NEPA and BRAC Environmental Coordinator

Contractor supporting
USAR 99th RSC, DPW ENV
5231 South Scott Plaza
Fort Dix, NJ, 08640
609-562-7661 (office)
919-270-7376 (cell)
609-562-7983 (fax)

Dennis W. Palmer, P.E., P.P
Letter dated July 30, 2009

Comment #1: The commenter notes that until the Mayor raised an issue on this proposal, no copies were provided in local libraries or other suitable locations for residents.

The commenter proposes a 30 day extension of the public comment period. The commenter also suggests the project come before a local planning board.

Response to Comment: As required by the National Environmental Policy Act and Army regulations, a public notice was placed in the Courier-Post newspaper on July 2 and July 3, 2009 announcing the 30 day public comment period and the location of where the Environmental Assessment was available for review. The document was initially available in three libraries, 2 of which were in the vicinity of the relocating units and one near the proposed project site. The Marie Fleche Memorial Library in Berlin, NJ was selected because of its proximity to the proposed site. At the request of the Mayor of Gloucester Township and others the public comment period was extended 30 days until July 31, 2009. A second newspaper notice was published announcing the comment period extension. The Blackwood Rotary Library in Gloucester Township and the Winslow Township Branch Library were also added as locations where the Environmental Assessment could be accessed. Typically for actions such as this, the Army notifies property abutters of the action via mail and the rest of the surrounding township(s) via a notice in the local newspaper as was done in this case. A public meeting was held in Gloucester Township on August 17, 2009. In addition, the Army met with township officials during the month of July, 2009 and worked with Camden County to come up with additional potential alternative sites.

Comment #2: The commenter disagrees with the findings of Table ES-2 of the Executive Summary as it appears to be a significant impact on land use, impacts on or nearby residents, noise, traffic, impact on property values, loss of ratable land, and a negative impact on the neighbors as to their quiet enjoyment of their property.

Response to Comment: *Significance* is interpreted in the context of the relevant environment and for each human and environmental topic analyzed in the EA definitions are provided for the level of impacts that constitute significant or not-significant impacts. Based on the analysis in the EA using appropriate scientific analytical tools, and professional judgment and expertise, none of the adverse impacts analyzed for this project as indicated in the EA rose to the level of being significant.

Comment #3: The commenter recommends changing the baseline year from 2008 to 2007 as the pre cleared site.

Response to Comment: 2008 was the timeframe when the Army went through its site selection process and identified the Cross Keys Road site for possible purchase and construction of the proposed project. At this time the proposed site had already been cleared of trees and graded by the current property owner. Therefore, 2008 is the appropriate year to consider as baseline conditions in relationship to the Army's proposed action. Using 2007 as the baseline for environmental conditions would not be an accurate representation of what the conditions of the property were when the site became available for purchase by the Army.

Comment #4: The commenter asks, regarding page 2.5 listing vehicles under table 2-2, how many of these vehicles are diesel powered. The commenter also suggests that Section 4-4 needs to address how many of the relocated vehicles are diesel powered.

Response to Comment: All military vehicles are diesel powered. Even though the vehicles are diesel powered, they are only being stored onsite with only a few vehicles moved into the Organizational Maintenance Shop on the weekends for routine maintenance, meaning that their contribution to local air quality is negligible. The vehicles would also continue to be moved offsite for annual 2 week training exercises at other locations. This is the same as what currently occurs at the existing facility. The vehicles would still be located in the same regional airshed. As demonstrated in the analysis contained in the EA, there would be no net increase in emissions as a result of the proposed action.

Comment #5: The commenter suggests investigating other locations for the proposed site such as already tax exempt properties that would meet the Army's criteria being examined.

Response to Comment: In light of public concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #6: The commenter suggests that under the No Action Alternative, the proposed site would go through old succession and be more expansive in its woodland nature and environment and suggested that should be the baseline condition.

Response to Comment: At the time the property became available for purchase by the U.S. Army, the parcel was already cleared of its trees, therefore that is the baseline condition for analysis. If the Army does not purchase the property (i.e. No Action alternative) it is not known what would happen to the property. However, the property is currently zoned for commercial use and the current land owner has the property for sale on the open market. As such, the property is likely to be sold to another commercial venture for development and not allowed to lay fallow to move through succession. However, because it is not known what future development may occur on the site, it is not appropriate to analyze future development under the No Action alternative speculatively.

Comment #7: The commenter disagrees with the analysis that no significant impacts would occur to visual or aesthetic resources and that a public hearing or planning board meeting should be held for public input.

Response to Comment: Thank you for your comment. The proposed facility would be like a community college building and existing trees around the boundary of the property will be left in place to the greatest extent possible to provide visual buffering to the site. Additionally, military vehicles would be located on the northeast side of the site, away from residential areas, and landscaping will be used to visually buffer them and the Organizational Maintenance Shop. Given required minimum security stand-off distances and landscaping, the Army Reserve Center would not substantially degrade the visual character of this commercially zoned site. Landscaping around the maintenance shop and parking areas will help buffer the site visually.

A public meeting was held on August 17, 2009 to solicit public input.

Comment #8: The commenter asks whether on page 4-15, section 4.5, if Army activities will be kept to the noise limits, especially on weekends?

Response to Comment: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop

for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances.

Comment #9: The commenter notes that, regarding pages 4-27, under 4.6.1.3 Prime Farmland, although the site contains soils that are considered farmlands of unique importance and farmland of statewide importance, the project site is zoned commercial and therefore is not subject to the FPPA. The commenter also notes that if the site were replaced with a commercial development, the municipality would gain a tax paying ratable and also the payment of the roll back taxes for the change in use for farming to commercial and states that this is a critical missing part of this section of the analysis. The commenter suggests that other land already not being taxed should be utilized.

Response to Comment: The impacts described in this section of the EA are associated with Geology and Soils, as opposed to economics. It is noted that the proposed action is not subject to the FPPA because the property is zoned as commercial use.

The Army recognizes that for this commercially zoned site there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #10: The commenter notes that regarding page 4-41, 4.8.1.3 Threatened, Endangered, and Sensitive Species, the NJDEP Natural Heritage Program indicated the occurrence of several state rare wildlife species or wildlife habitat at the preferred alternative. The commenter notes four state Rare wildlife species are anticipated to inhabit this site.

Response to Comment: After consulting with the NJDEP Natural Heritage Program the EA analyzed the potential impact to the four species that are known to have occurred on this site. The analysis found that there would be no significant impact to the species or their habitat mainly because with the site already cleared of trees it no longer provides preferred habitat for the species. By letter received October 28, 2009, the NJDEP Division of Fish and Wildlife concurred with the Army's conclusion.

Comment #11: The commenter notes that regarding page 4-57, 4.10 Socioeconomics, the section does not includes the anticipated negative impact on the property values of the adjacent residential area. The commenter also notes that the section does not address the removal of additional property from the township tax rolls. There is no impact analysis of the addition of another non taxpaying development. The section also does not address the roll back taxes for 3 years and the payment as would be required if the site was developed in the normal course as zoned commercial and a commercial property was installed.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process.

Comment #12: The commenter notes that there is no mention of recycling in the Section on Solid Waste, page 4-74.

Response to Comment: Recycling is discussed with regards to construction and demolition debris. During operation of the facility the Army would recycle materials that are able to be recycled like paper, bottles cans, toner, used oil etc.

Comment #13: The commenter notes that regarding the widening of Cross Keys Road discussed in section 4-14, although the project is not currently federally funded as part of the Delaware Valley Regional Planning Commission's (DVRPC) FY 2009-2012 Transportation Improvement Program (TIP), it was identified by DVRPC in its Long Range Plan, Destination 2030. The commenter also notes the potential for problems with traffic as the project will have vehicles entering and leaving the site on a 2 lane county road with no anticipated date for widening.

Response to Comment: The widening of Cross Keys Road is considered under the Cumulative Impact Analysis in Section 4.14 as a future action which would provide a beneficial cumulative impact as it would improve traffic flow. The analysis of how the proposed project would impact existing conditions

on Cross Keys Road (i.e. 2 lane road) is provided in Section 4.11. Based on current traffic conditions and accounting for standard traffic growth rates, the analysis, using accepted industry models, found there would be no significant impacts to traffic resulting from the proposed action.

Diane and Frank Palogruto
E-mail dated July 14, 2009

Comment #1: The commenter notes that there is heavy traffic on Cross Keys Road.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. During the operation of the facility no heavy truck traffic is intended for this site.

Comment #2: The commenter expresses concern that areas that were once trees and home to wildlife, will now be parking lots, storage buildings, military equipment, and vehicles and trailers and this will negatively impact the visual and aesthetic nature of the site.

Response to Comment: The Army understands that this site was once heavily wooded; however, it is currently an open field having been cleared of trees by the current land owner. This site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. The proposed facility would be like a community college building and existing trees around the boundary of the property will be left in place to the greatest extent possible to provide visual buffering to the site. Additionally, military vehicles would be located on the northeast side of the site, away from residential areas, and landscaping will be used to visually buffer

them and the Organizational Maintenance Shop. Given required minimum security stand-off distances and landscaping, the Army Reserve Center would not substantially degrade the visual character of this commercially zoned site. Landscaping around the maintenance shop and parking areas will help buffer the site visually.

Comment #3: The commenter questions the amount of noise and air pollution caused by construction and operation of the facilities.

Response to Comment: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances. Impacts on air quality would be short-term during the construction period. Long-term air quality impacts would not be significant during the operation of the facility as it is an administrative building. On weekends, emissions from military vehicles would be negligible and would be limited to moving several vehicles into the maintenance shop for minor routine maintenance such as changing oil, replacing wiper blades etc. Emissions for the operation of the Reserve Center would remain below thresholds that would impact local and regional air quality.

Comment #4: The commenter expresses concern for the impacts of the new facility on home values.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #5: The commenter expresses concern for his/her children and the fact that there is a township playground 500 feet from this project.

Response to Comment: The main entrance to the facility would be located on Cross Keys Road so traffic would not impact children playing outside. The Reserve Center is a facility like a community college building and the maintenance shop and military equipment parking area would be screened by landscaping to minimize visual impacts. In addition, the facility would be surrounded by a fence to prevent children from potentially entering the site.

Mary and Nicholas Palumbi
Letter dated July 15, 2009

Comment #1: The commenter notes concern for the potential susceptibility of the site to terrorist threats. The commenter also notes concern that two area schools, a high school and an elementary school, are located nearby.

Response to Comment: Armed Forces Reserve Centers are not typically terrorist targets. However, regardless of the threat potential, standard security measures are required for all military buildings/installations including Reserve Centers. Security measures designed for the Reserve Center affords a generous setback from the perimeter fencing and area neighborhoods.

The U.S. Army Reserve will not alter typical recruiting methods nor target specific demographics or schools within the area.

Comment #2: The commenter expresses concern for the visual aesthetics of the site viewed from their backyard.

Response to Comment: The Army understands that this site was once heavily wooded, and as many of the remaining trees will be retained as possible depending on the final design and layout of the facility which will help to provide a visual buffer to the site. Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building that is well landscaped. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. The maintenance facility will be approximately 4,000 additional square feet and it along with the military vehicle parking area located in the northeast portion of the property would be screened with landscaping to buffer the visual impacts.

Comment #3: The commenter expresses concern for the noise that will accompany the site.

Response to Comment: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances.

Comment #4: The commenter questions why notification of the project did not occur during the school year.

Response to comment: The National Environmental Policy Act and Army regulations require that once an Environmental Assessment has been completed on a proposed action that it be made available to the public for review during a 30 day comment period. The Environmental Assessment was made available to the public for review as soon as it was completed.

Beverly L. Pawlak
E-mail dated July 22, 2009

Comment #1: The commenter expresses concern for the runoff from paving.

Response to Comment: The proposed facilities will increase the amount of impervious area on the site. While there may be existing drainage concerns as noted by the commenter, potential solutions for stormwater management include stormwater management measures (e.g. oil-water separators and stormwater detention pond(s)) that will treat all stormwater on site for quality and quantity. Development of the site will also be consistent with forthcoming Environmental Protection Agency and Department of Defense requirements implementing Section 438 of the Energy Independence and Security Act which requires federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies to control stormwater runoff.

Comment#2: The commenter expresses concern about displaced wildlife.

Response to Comment: As discussed in the EA, given the existing cleared nature of the site the amount and diversity of wildlife on the site is limited. During construction, the Army will avoid clearing more

trees to the greatest extent possible. While the limited existing wildlife would be impacted by the construction of the facility on the site, there is property adjacent to the site to the northeast and across Cross Keys Road to the south that provides additional habitat for species. After construction and landscaping, species adapted to human presence would likely return to the site, particularly common bird species.

Comment#3: The commenter expresses concern about visual impacts of the facility and privacy issues.

Response to Comment: The Army understands that this site was once heavily wooded, and as many of the remaining trees will be retained as possible depending on the final design and layout of the facility which will help to provide a visual buffer to the site. Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a Community College Building that is well landscaped. The maintenance facility will be approximately 4,000 square feet and it along with the military vehicle parking area located in the northeast portion of the property would be screened with landscaping to buffer the visual impacts. This is mainly an administrative and classroom facility, so most of the training will occur inside the main building of the facility. Some minor vehicle maintenance will also occur in the maintenance shop, however, there will be no outdoor drilling exercises conducted at this site. The minimum security stand-off distances from the building to the property boundary and landscaping to screen the maintenance shop and vehicle parking areas this facility will help minimize privacy issues.

Comment #4: The commenter expresses concern about the noise on the site.

Response to Comment: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances.

Comment #5: The commenter expresses concern about the traffic that will be generated because of the facility and cars from the facility potentially using the cul-de-sacs as cut throughs.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. Noise during the construction and operation of the facility will comply with the existing noise regulations for Camden County. During the operation of the facility, noise impacts are expected to be minimal as this facility will operate much like a community college building and no heavy truck traffic is intended for this site.

The Army understands the concern about traffic using local residential roads as cut-throughs. However, Cross Keys Road is the main road accessing local highways and hotel/food locations, so it is unlikely that reservists would use local residential neighborhood roads for travel.

Comment #7: The commenter expresses concern for the impacts of the new facility on property values.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

David and Marilyn Peoples
E-mail dated July 31, 2009

Comment #1: The commenter expresses concern for the effects that paving 11 acres of land and bringing many cars and vehicles to the area will have on his/her well. The commenter notes that the aquifer will experience pollution from the oil/gas residue runoff and that the facility will draw more water than a residential/agricultural use.

Response to Comment: The proposed facilities will increase the amount of impervious area on the site. Potential solutions for stormwater management include stormwater management measures (e.g. oil-water separators and stormwater detention pond(s)) that will treat all stormwater on site for quality and quantity. Any stormwater discharged off-site will meet all state and local regulatory and permit requirements Development of the site will also be consistent with forthcoming Environmental Protection Agency and Department of Defense requirements implementing Section 438 of the Energy Independence and Security Act which requires federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies to control stormwater runoff.

All waste and hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for them to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through private contracts. These measures would prevent contaminants from entering the groundwater and affecting drinking wells.

The facility will be tied into the municipal water supply lines along Cross Keys Road and is not expected to exceed the capacity of the system. Additional verification of this will be conducted during the final design phase of the project. In addition, the facility is being built to Leadership in Energy and Environmental Design (LEED^{tm}) Silver Rating standards. To meet this standard it is likely that the new facilities would be outfitted with Energy Star rated water-efficient control devices which would decrease the amount of water usage by the facility.

Comment #2: The commenter notes that inevitably, traffic and more noise will have an adverse effect on property values.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During

the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. Noise during the construction and operation of the facility will comply with the existing noise regulations for Camden County. During the operation of the facility, noise impacts are expected to be minimal as this facility will operate much like a community college building and no heavy truck traffic is intended for this site.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #3: The commenter indicates that the facility would require a zoning change and that they do not support such a change.

Response to Comment: As discuss in Section 4.2.2.2 of the Environmental Assessment, the site is currently zoned for commercial use by Gloucester Township. This zoning classification allows for the construction and operation of the Reserve Center without the need to change the zoning.

Lisa R. Phifer
E-mail dated August 19, 2009

Comment #1: The commenter suggests that a synopsis of the report would be informative for the residents who did not read the full report.

Response to Comment: An Executive Summary was prepared, and is included in the EA behind the front page of the document.

Comment #2: The commenter asks if the Army will replace the local playground with an equal or better playground if the facility requires that sewer lines run through the current playground.

Response to Comment: The current design of the proposed project provides for the sewer line to connect in at Cross Keys Road. The sewer line is not proposed to go through the local playground.

Comment #3: The commenter asks if the new facility will enhance real estate property values.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #4: The commenter asks if a drawing of the facility can be developed to point out how the center will aesthetically enhance the area.

Response to Comment: Design drawings of the proposed facility, which were unfortunately not available at the time that the Environmental Assessment was published, were displayed at the public meeting held on August 17, 2009.

Comment #5: The commenter suggests that the Army send out a team to meet with the residents within the neighborhood answering any questions that arise. Additionally, the commenter suggests that the Army hand out a synopsis of the report and a sketch of the exterior of the new facility.

Response to Comment: A public meeting for interested residents was announced and held on August 17, 2009. At the meeting design drawings for the proposed facility were on display. An Executive Summary for the Environmental Assessment describing the project and its potential impacts was prepared, and can be found at the front of the Environmental Assessment.

Comment #6: The commenter requests a copy of the minutes at the recent meeting with the residents at the Gloucester Municipal building on Monday, August 17, 2009. The commenter also requests a list of who attended the meeting for the Army and what their function was.

Response to Comment: The public meeting was recorded and transcribed by the Army. All individuals who provided comments on the Environmental Assessment will receive a copy of the comments (including the transcript of the public meeting) and the Army's responses to those comments.

The following personnel attended the public meeting for the Army:

Kevin Jasper, Project Manager (PM), Louisville Engineer District, Great Lakes and Ohio River Division (LRD)/U.S. Army Corps of Engineers (USACE)

Anthony Yeldell, Military Construction PM, Office of the Assistant Chief of Staff for Installation Management (OACSIM)/Operations Division Reserve (ODR)

Mark Stousland, Contract Architect Principal, LRD/USACE

Ravi Ajodah, 99th Regional Support Command (RSC) Base Transition Coordinator (BTC) (North Region), 99th RSC

LTC Floyd Harrington, Staff Engineer, 99th RSC

MAJ Tracy Phillips, Staff Engineer, New Jersey Army National Guard (NJARNG)

Todd Hornback, Staff Communications Specialist, LRD/USACE

Kirk Bargerhuff, Environmental Specialist, BRAC NEPA Support Team, USACE

Stanley Nuremburg, Real Estate Specialist, NY Engineer District, USACE

Nancy Schmidt
E-mail dated August 20, 2009

Comment #1: The commenter notes that she would welcome the military and the new facility would be great for business in the area.

Response to Comment: Thank you for your comment on the proposed project.

Jay Stiefel
E-mail dated July 29, 2009

Comment #1: The commenter notes that considering the global climate of terrorism and anit-US sentiment, the proposed site could impact the security of such a densely populated, residential area.

Response to Comment: Armed Forces Reserve Centers are not typically terrorist targets. However, regardless of the threat potential, standard security measures are required for all military buildings/installations including Reserve Centers. Security measures designed for the Reserve Center affords a generous setback from the perimeter fencing and area neighborhoods.

Comment #2: The commenter notes that the construction of the proposed AFRC would destroy 11 acres of the little open space left in the area, and would also detract from the townships' tax base.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #3: The commenter notes that the proposed facility will dramatically increase the traffic that already exists on the crowded roads.

Response to Comment: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours and designating sufficient parking and storage space for construction related vehicles and materials. No heavy truck traffic is intended for this site.

Marjorie and Maceo A. Thomas, Jr.
E-mail dated July 29, 2009

Comment #1: The commenters state that they are opposed to the proposed action as it will destroy the community and the quality of residents' lives.

Response to Comment: Thank you for your comment on the proposed action.

Shawn Thomas
E-mail dated July 30, 2009

Comment #1: The commenter questions if the playground adjacent to the property will be torn down during the construction of the sewer connection that would go through the playground.

Response to Comment: The current design of the proposed project provides for the sewer line to connect in at Cross Keys Road. The sewer line is not proposed to go through the local playground.

Comment #2: The commenter notes that it would be unsafe for children, given the traffic generated on the base and the opportunity for the neighborhood children to be running over to the parking lot.

Response to Comment: For security reasons the property boundary would be secured by fencing, thus preventing the opportunity for children to enter the property.

Comment #3: The commenter states that the property would be an eyesore for the community.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. While the site would no longer be an open field, the proposed facility would be much like a community college building. Existing trees around the boundary of the property will be left in place to the greatest extent possible to provide some visual buffering to the site. Additionally, military vehicles would be located on the northeast side of the site, away from residential areas, and landscaping will be used to visually buffer them and the Organizational Maintenance Shop. Given required minimum security stand-off distances and landscaping, the Army Reserve Center would not substantially degrade the visual character of the site.

Comment #4: The commenter states that the property value of the area homes will be destroyed.

Response to Comment: The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #5: The commenter indicates that the facility would produce unwanted noise on the weekends.

Response to Comment: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances.

Comment #6: The commenter suggests that if the Army moves ahead with the proposed action that they offer to buy out their home.

Response to Comment: The Army will pay for home relocation if the house resides on the actual property being purchased, per Public Law 91-646 "Uniform Relocation Assistance and Real Property Acquisition Properties Act" of 1970.

Tom and Mary Vaccara
Letter dated August 3, 2009

Comment #1: The commenter states her opposition to the construction of the proposed military facility on Cross Keys Road and explains that there are other non-residential, already tax-exempt properties that would offer a better fit for such a facility.

Response to Comment: During the initial site selection process in 2008 the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the site selection process the Cross Keys Road and Erial Road sites were the two sites that were available for purchase at that time that best met the Army's needs and site selection criteria. The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process. During the public review period the Army has received a number of similar comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of

these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. The Army understands that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #2: The commenter explains that the proposed facility would disrupt the neighborhood as well as depreciate the home values.

Response to Comment: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #3: The commenter states that she does not want to hear drills and machinery on weekends. The commenter also explains that she does not want her children's playground to be the backdrop for a parking lot maintenance yard.

Response to Comment: No outdoor military drills would be performed on site. Impacts to noise during operation of the facility would be negligible during the typical workday. During weekends a few vehicles would be moved from their storage location into the Organizational Maintenance Shop for minor routine maintenance (e.g. changing oil, tires etc) with minimal noise impacts. Noise during construction and operation of the facilities would meet all Township and Camden County noise regulations, but is expected to be minimal. The employee vehicle parking lot would be located near the street entrance and the military vehicle parking area would be located in the northeast portion of the property away from residences as much as possible. Landscaping around the maintenance shop and parking areas will help

buffer the site visually. For security reasons the property boundary would be secured by fencing, thus preventing the opportunity for children to enter the property.

Sherry White, Tribal Historical Preservation Officer
Stockbridge-Munsee Tribal Historic Preservation Office
W13447 Camp 14 Road
P.O. Box 70
Bowler, WI 54416
Letter dated July 6, 2009

Comment #1: The commenter explains that as described in the Army correspondence, the proposed ground disturbing activity of this project is not in a region of archaeological interest to the Stockbridge-Munsee Tribe.

Response to Comment: Thank you for your comment on the proposed project.

RESPONSE TO COMMENTS

PUBLIC MEETING
AUGUST 17, 2009

During the initial 30-day public comment period for the Environmental Assessment, the Army received a request from Gloucester Township as well as from members of the public for a public meeting to be held to inform the public more about the project as well as to hear their concerns and receive input. As a result, the Army extended the public comment period for 30 days and held a public meeting in Gloucester Township on August 17, 2009. A number of comments were made during the public meeting. The comments are summarized below. After each comment is the Army's response to the comment. Topics of most concern dealt with the public involvement process, impacts on residential property values and other socioeconomic impacts, removing a commercial property from a taxable status, visual impacts on neighboring residences, noise, traffic concerns, stormwater runoff and impacts to ground water, wildlife impacts, and concerns for impacts to children.

Comment #1: Many commenters noted concerns regarding public involvement for this Environmental Assessment (EA). Some commenters stated that they were informed too late about the project and that they did not have sufficient time to comment.

Response: While the Base Closure and Realignment legislation was signed into law in 2005, it was not until 2008 that the Army began looking into selecting a site for this project. The Army followed National Environmental Policy Act and Army regulations by completing a draft Environmental Assessment for the proposed action and then providing it to the public for their comment/input over the course of a thirty day period. Letters were mailed to property owners abutting the proposed alternative sites on June 30, 2009. Additionally, a notice was placed in the Courier Post newspaper on July 2 and July 3, 2009 providing the rest of the community notice that the Environmental Assessment was available for a 30 day comment period ending July 31.

Comment #2: Many commenters expressed concern that as a result of the proposed training facility, the township will not have economic gains, but instead taxes will increase because the facility will be non-taxable zoning.

Response: As described in Section 4.10 of the EA, economic benefits will arise during the construction of the facility. Longer term, during the operation of the facility, economic benefits in other areas will result; however, based on the existing economic measures of the region the benefits from the Reserve

Center will not be major. Other areas that would see economic benefits from the Reserve Center are local hotels housing the reservists on the weekends, local food establishments, gas stations, and businesses supplying administrative supplies etc for the new facilities. The Army recognizes that for these commercially zoned sites there will be a difference in tax revenue realized if an Army Reserve Center is constructed on the site vice another commercial development, and this will be taken into consideration during the final decision making process.

Comment #3: Many of the commenters noted concern that property values near the project areas will decrease as a result of construction of the proposed training facility.

Response: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. The proposed construction is for a facility that is like a community college building. The Army Reserve Center proposed for Cross Keys Road will be approximately 50,000 square feet of the latest state-of-the-art classroom and administrative office space. No outdoor drilling exercises would occur at this facility. The maintenance facility will be approximately 4,000 additional square feet and will have two bays for routine minor maintenance such as replacing wipers or tires. Any heavy repair would be conducted at another site and not at this facility, and no heavy truck traffic is intended to be used at this center.

The Cross Keys Road site is currently zoned for commercial use, and the current land owner has the property for sale on the open market. As such, the property can be sold to a commercial venture for development, with the parcel being developed much differently than that of an Army Reserve Center. As home valuation is assessed by the local governments, the effect on home valuation cannot be assessed by the Army. However, Army Reserve Centers are modern and well designed, with appropriate functionality to the area they serve.

Comment #4: A large number of the commenters expressed concern for the increases in traffic that the proposed training facility would bring to an area that they described as heavily congested.

Response: The EA's traffic analysis used the industry-accepted procedures established by the Institute of Transportation Engineers *Trip Generation* guidance to analyze impacts to traffic. During the weekday, the facility would generate relatively little traffic, due to the small number (17) of full-time employees. While a greater number of reservists will be traveling to the site on the weekends, the lower mainline volumes on Cross Keys Road during the typical arrival and departure times for the reservists would make it very unlikely that significant increased traffic delays would occur. It is recognized that some impacts to traffic

could occur during construction activities. However, to minimize these impacts a Maintenance and Protection of Traffic plan, as indicated in the EA would be required and approved by Camden County and the New Jersey Department of Transportation, and would need to be prepared to the specification of the Manual on Uniform Traffic Control Devices. Other actions that would help lessen impacts could include requiring most of the construction vehicles delivering materials to do so outside peak traffic hours, and designating sufficient parking and storage space for construction related vehicles and materials. During operation of the facilities no heavy truck traffic is intended for this site.

Comment #5: Many commenters expressed concerns about the preferred site placement, stating that a training facility like the one proposed should not be placed in such close proximity to residential properties. The commenters noted that there are many other sites in Gloucester [Camden] County as well as other counties that would not be in such close proximity to residential areas.

Response: Sites selected for Army Reserve Centers are intended to be good locations for both the Army and community alike. Per the language of the BRAC law, the Army must construct the facilities in Camden County. One of the selection site criteria was that a parcel must be available for purchase. During the initial site selection process in 2008, the Army vetted a total of 12 sites that were known to be available for purchase at that time. Through the site selection process the Cross Keys Road and Erial Road sites, which are both zoned for commercial use, were the two sites that were available for purchase at that time that best met the Army's needs and site selection criteria.

Comment #6: A few of the commenters expressed concern that there would be weapons stored and discharged at the proposed training facility so close to residential properties.

Response: Weapons training is done indoors with a state-of-the-art simulator. No live ammunition will be stored or used at the facility.

Comment #7: Many commenters expressed concern for the noise resulting from training on weekends at the proposed facility and how this noise would impact area residents and the ambient noise level. These commenters requested information regarding the weekend training schedules and the types of noise that could be expected.

Response: While there would be noise from construction activities, these impacts would be short-term and would comply with all township and county noise regulations. During weekday operations of the facility, there would only be 17 full-time employees. With employee parking lots located near the street, the addition of 17 full-time employees to this site would create negligible noise from traffic. Given the

nature of the facilities and minimal number of employees noise produced during the weekdays would be negligible. On weekends, most activities (training and administrative work) will be performed indoors. No outdoor training exercises will occur and no heavy truck traffic is intended for this site. Only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop for minor routine maintenance each weekend, minimizing any noise impacts. Operations during the entire week will comply with all township and county noise ordinances.

Comment #8: Some of the commenters expressed concern for the noise resulting from the maintenance shop at the proposed facility. They inquired about what types of maintenance would occur and what types of noise could be expected.

Response: Each weekend only a few vehicles will be moved from the military equipment parking area to the Organizational Maintenance Shop for minor routine maintenance, minimizing noise impacts. Maintenance would be conducted inside the shop, minimizing noise impacts and would consist of such routine maintenance as changing tires, changing oil, changing wiper blades etc. Operations during the entire week will comply with all township and county noise ordinances.

Comment #9: Several commenters had questions and concerns regarding the 61 vehicles listed for the proposed training facility. Commenters expressed concern for both the noise and pollution resulting from the use of these vehicles. In addition, commenters wanted to know what types of vehicles would be used and if these vehicles used diesel fuel.

Response: Wheeled vehicles and trailers would be used by the reservists at the facility, all would be diesel powered. No tracked vehicles would be used. Only a few vehicles would be moved around on a typical weekend, moving the vehicles from the parked location into the maintenance shop for routine maintenance. There would be minimal noise and emission pollution from the operation of the few vehicles on the weekends. Landscaping around the maintenance shop and the vehicle parking area will help minimize noise impacts.

Comment #10: Several commenters expressed concern for how the fuel for the aforementioned vehicles would be stored at the proposed training facility.

Response: There would be no bulk storage of fuel at the facility**.** Vehicles will refuel off-site.

Comment #11: Many commenters expressed concern regarding the run-off from the proposed training facility explaining that there were already flooding problems in the area and that more concrete acreage

would only exacerbate this problem. Commenters wanted to know the specific storm water management plans for the proposed training facility.

Response: The proposed facilities will increase the amount of impervious area on the site. While there may be existing drainage concerns as noted by the commenters, potential solutions for stormwater management include stormwater management measures (e.g. oil water separators and stormwater detention pond(s)) that will treat all stormwater on site for quality and quantity. Development of the site will also be consistent with forthcoming Environmental Protection Agency and Department of Defense requirements implementing Section 438 of the Energy Independence and Security Act which requires federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies to control stormwater runoff.

Comment #12: Many of the commenters expressed concern for their well water and how it would be affected by the proposed training facility.

Response: Typical construction practices would not impact wells. During construction standard best management practices would be used to prevent impacts from stormwater or from contaminants entering the groundwater. All hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements for hazardous materials and control of hazardous materials to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through the Defense Reuse and Marketing Organization (DRMO) and are not expected to impact the underground water sources.

Comment #13: Several commenters expressed concern for the vegetation in the area surrounding the proposed training facility. Commenters explained that there is now only a sparse vegetation buffer between the residential properties and the site for the proposed training facility. They questioned what will happen to these remaining trees and if any new ones would be planted.

Response: Given the final design and layout of the facilities, the Army will leave as many of the remaining trees standing as possible. The site will also be landscaped with new trees, bushes, etc. to help screen areas such as the maintenance shop and vehicle parking areas providing both a visual and noise buffer.

Comment #14: Several of the commenters stated that the Environmental Assessment incorrectly classified the proposed site as farmland. They explained that instead, the site had previously been forested land with a small pig farm.

Response: A small portion of the property is indicated to be agricultural land. As indicated in the footnote to Figure 4-2, it is recognized that the land was recently cleared of trees and graded by the current property owner.

Comment #15: Several of the residents questioned the Environmental Assessment's findings in the Executive Summary that state there would be no significant impact. These commenters explained that they believe that placing the proposed training facility at the proposed site will have a significant impact to many resource areas.

Response: The Environmental Assessment does not reach a conclusion that there would be no adverse effects on the natural or human environment, just that the adverse effects would not be at a level where they *significantly effect* the human or natural environment. *Significance* is interpreted in the context of the relevant environment and for each human and environmental topic analyzed in the EA definitions are provided for the level of impacts that constitute significant or not-significant impacts. Based on the analysis in the Environmental Assessment using appropriate scientific analytical tools, and professional judgment and expertise, none of the adverse impacts analyzed for this project as indicated in the Environmental Assessment rose to the level of being significant under the Nation Environmental Policy Act.

Comment #16: Several commenters disagreed with the 2008 baseline for the project. Instead, they explained that the baseline should be 2007 to reflect the conditions of the property before the forested area had been cut.

Response: 2008 was the timeframe when the Army went through its site selection process and identified the Cross Keys Road site for possible purchase and construction of the proposed project. At this time the proposed site had already been cleared of trees and graded by the current property owner. Therefore, 2008 is the appropriate year to consider as baseline conditions in relationship to the Army's proposed action. Using 2007 as the baseline for environmental conditions would not be an accurate representation of what the conditions of the property were when the site became available for purchase by the Army.

Comment #17: Several of the commenters expressed concern that the proposed training facility would increase the potential of terrorist threats in the project area. Commenters asked about how these safety threats would be handled.

Response: Armed Forces Reserve Centers are not typically terrorist targets. However, regardless of the threat potential, standard security measures are required for all military buildings/installations including Reserve Centers. Security measures designed for the Reserve Center affords a generous setback from the perimeter fencing and area neighborhoods.

Comment #18: Several commenters wanted to know what types of chemicals would be used at the proposed training facility and what the handling and disposal procedures for these chemicals would be.

Response: Only routine vehicle maintenance would be performed at the facility. Therefore, any chemicals that will be used and/or stored at the facility would be petroleum, lubricants, cleaning solvents, etc. All waste and hazardous materials would be handled and stored in compliance with all federal, State, and local laws and regulations governing the use of and reporting requirements to minimize hazards to public health and damage to the environment. Waste materials would be disposed of in accordance with all regulatory requirements through private contracts.

Comment #19: Several commenters wanted to know how the proposed sites were identified and what identification process was followed.

Response: A description of the site selection process is included in the Environmental Assessment Section 3.0. The Army conducted the site selection process according to Army Regulation (AR) 140-483. The site selection process for the Camden, NJ BRAC USAR facility started in 2008. There are many elements that go into determining the Army Reserve's preferred alternative - site access, utilities, cost to purchase the property, visibility, Anti-Terrorist/Force Protection (AT/FP) standoff distances, site layout - in addition to effects on natural and cultural resources.

The Army vetted a total of 12 sites that were known to be available for purchase at that time of the start of the site selection process in the Camden County region that met the acreage requirements for siting a Reserve facility. After evaluation of the 12 sites according to procedures outlined in AR 140-483, the Cross Keys Road and Erial Road sites were the two sites that best met the Army's needs and site selection criteria.

Comment #20: Several commenters asked if other new sites will be considered.

Response During the public review period the Army has received a number of comments raising concern about the tax status of the Cross Keys and Erial Road site locations. In light of these concerns, the Army is allowing the local County government to submit additional sites for the Army to consider for the construction of the AFRC. It is the Army's understanding that the Camden County Improvement Authority has been tasked with developing the list of additional properties.

Comment #21: Many commenters asked when the final decision and site selection will be made and how they will be notified of it.

Response: At the end of the public comment period the Army reviews and responds to the public comments. If comments do not warrant changing the analysis to indicate a significant impact on any resources the Army will sign the Finding of No Significant Impact. Individuals who made comments on the project will be provided a copy of the Finding of No Significant Impact along with the Army's responses to the comments received during the public comment period. In addition the public will be notified of the Army's decision on this proposed project through public announcements in the local media.

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ARMY FORCES RESERVE CENTER

GLOUCESTER TOWNSHIP, NEW JERSEY

PUBLIC MEETING

HELD: AUGUST 17, 2009

MR. JASPER: Folks, I've got 7:05. If everybody could take their seats, we'd like to get it started if

that's okay. Does anybody know that they're waiting on somebody? Okay. We've got -- got everybody here that's going to be here for now? Okay.

Okay. Good evening, ladies and gentlemen. My name is Kevin Jasper. I am the project manager for the U.S. Army Corps of Engineers. I am out of Louisville, Kentucky if you can't tell from my accent. So if there's anything about that, that's just me, so -- appreciate the Mayor inviting us here to Gloucester to give a presentation about the Armed Forces Reserve Center that is proposed in Camden County.

This meeting tonight, more so about the Army presenting to you -- or the Army Reserve presenting to you as much as us to listen back to your-all's input. We advertised the environmental assessment late June, early July time frame. Some of you received it early July, put it in the local library, put it out on some web sites for people to see, and throughout that process we received comments, several comments from the community, several comments from local government. Had some meetings with local government, talked to state and federal representatives regarding it, and ultimately realized that we need to come to Camden County,

Gloucester Township, and sit down and discuss with your our proposed project.

When you hear the Army Reserves come with an Armed Forces Reserve Center, I'm sure there's concerns that some of you may have, and obviously adjacent property owners could be impacted more so than some of the people in the outskirts of the county or of the

township. So we're here today to present to you what it is that we're actually doing, why we're doing it, give you a little bit of schedule for what we're doing, and then to respond to your comments as best we can -- to take your comments and I'll respond to them as best we can.

So before I proceed on, I'd like to introduce a few players who have been involved with this project. Mr. Tony Udell [phonetic] here. He is with the Assistant Chief, Secretary --

MR. UDELL: Assistant chief of staff, real estate management, Department of the Army (inaudible).

MR. JASPER: Okay. Tony's basically out of Washington. He kind of -- he's my customer. In many ways, Tony's my customer. The Corps of Engineers in this case works for the Army Reserve. They're our customer. We are responsible for the design and construction of this project, and as project manager,

I'm ultimately responsible for that. Before we do that design and construction, we have to follow real estate acquisition processes. We have to follow the National Environmental Policy Act, and that's ultimately why we're here today, is to discuss those type of questions. Okay?

I also want to introduce to you Major Tracy Phillips. Major Phillips is with the New Jersey National Guard. The BRAC legislation identifies that if the state so decided, they could be a participant who was stationed at this Armed Forces Reserve Training

Center. The state has selected to be a participant in the training building, and we have actually laid out a floor plan and design to meet their unit needs for this specific facility. So that's why Major Phillips is here.

Next to him is Lieutenant Colonel Harrington [phonetic]. Lieutenant Colonel Harrington is here representing the 99th Regional Support Command. Part of the BRAC legislation was a reorganization of the Army Reserve Regional Support Commands. They went from nine, reduced it down to four. Fort Dix was one of the centers that was selected and they built a new Armed Forces Regional Headquarters on Fort Dix to support basically the regional operations in the northeast area.

Okay? Lieutenant Colonel Harrington is here representing that organization. They will be the ones that orchestrate and manage the units that fall into this facility. Okay?

Next to him is Robbie Ajodah [phonetic]. Robbie is also with the 99th R.S.C. Command. Robbie's been involved with the National Environmental Policy preparation packages, the coordination on that. He's also been involved with the real estate and ultimately overall in the design and construction coordination also.

Next to him is Kirk Barhoff. He is with the National Environmental Policy Act national team. Kirk supports the NEPA policies for the entire BRAC program I believe in the northeast area. Is that it?

MR. BARHOFF: All over.

MR. JASPER: All over. So he's nationwide. He's here to kind of give a nationwide perspective on why we do NEPA and ultimately what we're doing with it and help me respond to any questions related to that.

Next to him is Stanley Nuremberg [phonetic]. Stan is with the New York District Corps of Engineers. Stan is responsible for coordination of the real estate activities. Stan was involved with the initial site identification when we came in to Camden County as a

whole, and assessed what properties in Camden County are potential sites that meet the Army Reserve criteria. He ultimately helped develop a report that was staffed up and ended up with the two sites that have been identified in the environmental assessment, which was publicized to you, the primary -- what I'll refer to as the primary and alternative site. Okay?

Next to him is Mark Stousley [phonetic]. Mark is a contractor. Nothing against Mark. Good guy. You need to understand where the contractors are in the government. Mark is with R.S.V. Architects. They are ultimately responsible for the design which we have done for the Armed Forces Reserve Center here in Camden County. These easels that you see here, presentations are the product of R.S.V. Architects. R.S.V. Architects is very experienced with the Corps of Engineers and Army Reserve, have several years of experience. Mark's very knowledgeable in site layout requirements related to the Army Reserve, security and what a Reserve Center is tended to use for. So Mark's going to present to you

the site layout, the floor plan layouts and what's inside the building and what really is an Army Reserve Center. And hopefully we'll be able to moderate some of the concerns that are out there as far as what an Armed Forces Reserve Center is. Okay?

So as you can see, we came in full force. We recognize there is concerns out there. We want to listen to your concerns and do our best to address those concerns as we go forward. Okay?

What we're going to do is we're going to give ourselves a chance to give you a presentation and present to you what this is, and then from there we will invite you up to the podium and you will have an opportunity to provide your public comments to us. Okay? When we get to that, we'll have a little bit of an announcement about how we'll handle those and we'll move forward from there. Okay?

The reason we're here is in 2005, the Base Realignment and Commission legislation was drafted and put into law. That law ultimately said realign the armed forces, both active Army, Army Reserve, and National Guard if they so chose to, all across the country. Army Reserve primarily was within the continental United States. Ultimately we consolidated forces more from say five centers into one. That's an example, but we tried to reorganize and relocate to areas where there was a need for new training centers, or where there were old training centers that weren't supporting our soldiers as well as they need to now.

We felt there was a need for a new center to kind

of consolidate forces and provide a better facility, which these soldiers deserve. Congress felt that it was necessary to -- as the soldiers were coming back from the war zones, that they deserved better facilities. And rightfully so. They do.

We all -- if you've ever seen some of these Reserve Centers, some of them are thirty, forty years old, walls cracking. I will tell you that the Army Reserve Center in Pennsauken is not the best center that you would want to come back to. More modernized facilities and things like that.

So the BRAD legislation in 2005 is what started this process. That's been in legislation. The BRAC Commission identified the Reserve Center in Camden, New Jersey as to be one that was realigned, and so therefore the process started at that point. Okay?

The actual public law is 100-dash-526 statute 2623 if you're interested. What that law says in regards to the Camden County Reserve Center is that they will close the Nelson-Britton Army Reserve Center in Camden, New Jersey. If any of you aren't familiar with that it's actually in Pennsauken and it's an existing Army Reserve Center that has ongoing operations. So that Center closes and the units are relocated to a new consolidated Armed Forces Reserve Center in Camden, New

Jersey if the Army can acquire suitable land for construction of the new facility.

A couple key points. The legislation says in Camden, New Jersey, if we can acquire land suitable for our needs. It also says that the New Jersey National Guard can come into that Reserve Center if they so choose as I had previously pointed out. The National Guard will actually be relocating units from the National Guard Armory in Burlington into the Camden, New Jersey Armed Forces Reserve Center.

An Armed Forces Reserve Center involves basically your citizen soldiers. Some of you may have a brother or sister who's been involved with the Army Reserve. You may have an aunt or an uncle who's done it in the past, but these are reservists. They're not full-time soldiers. They do it based as a part-time position to support and serve the country that they so love.

Again, it's not active Army. It is reservists who basically are what we call the weekend warriors. Most of their work is primarily on the weekends. If they do have a major training exercise, it's usually remote to the Armed Forces Reserve Training Center. But this Center basically involves a lot of the -- what we'll call the local soldiers who are involved with the Army Reserve and New Jersey National Guard.

As we had indicated, part of the reason we're changing sites is to -- the current sites don't meet the current operational or training needs. You may have heard about a weapons simulator. The existing facility doesn't have such a modernized system. The weapons simulators -- has anybody got a Wii? Your kids got a Wii? Basically a big advanced Wii is what a weapons

simulator is.

Does it involve actual bullets, shooting? It's a room maybe the size of this. It's got five lanes in it, and then they basically shoot lasers at different targets, and then the Army can put in different acoustics into it or lighting into it to make it more war-like. Okay?

The facility -- and I'm going to let Mark Stousley talk a little bit more about this, but it's more of a campus-focused classroom training with administration and maintenance. The estimated peak usage for the Camden, New Jersey project is 184 soldiers. Total assignments, actually 364, but what happens is, there's different units and they operate on different weekends.

During the week, we expect -- I'm going to say somewhere between fifteen and twenty full-time employees on-site, and then on the weekends, the units assigned to

that weekend would come in and do their training at the Armed Forces Reserve Center. Okay? I think another key point -- we've heard a lot about vehicle maintenance, but there's actually -- for the Army Reserve, one full-time mechanic assigned to this Reserve Center. And then there's six weekend warriors assigned to it, and those will be scattered out across the month. So a total of seven mechanics, one of them being there full-time.

The operations do not involve nuclear, chemical or biological weapons. No training with live or blank

munitions. No tanks or cannons.

From a community perspective with this, we've heard a lot about the tax base and the tax impact. The Army Reserve will -- as we see it now, if we can select the primary site and move out on construction, we're prepared to start construction, award a contract in October, which would be a contract that could be put in place and construction could start up. So you could actually see construction activity, construction workers in the area sometime in October if we're successful with a site selection and getting funds in 2010 to do that. The benefit of that is, you have workers coming into the area who will be stopping at your gas station, just like I stopped at the gas station. They'll be stopping at

your restaurants and being -- things like that.

So there is economic impact with that construction activity. We hope that a local contractor -- and I suspect there might be a contractor here, because we've actually had interest from the local community as far as getting the actual construction contract. So the expectation would -- that we could see some of the local community, and would fully expect that the local community would be part of the workforce that would be involved with the construction project. I can tell you from the design standpoint, we have utilized the service of some of the local engineering firms to help us out in designing the project.

The Army Reserve will have ongoing contracts to manage the facility, snow removal, janitorial contracts. So there's a variety of contracts as they go into

operation that the Army Reserve will put out, and ultimately, in all likelihood a local firm who is capable could do those types of contracts. So the Army Reserve would actually like to utilize the local firms to help them out and do those type of things. And so therefore there's the benefit back into the community.

The other alternative is when the Center is closed in Pennsauken, there will go through a process where that center comes out to the public. And I say

public. First I believe it goes to the government agencies. But the previous facility that's being closed could be utilized to the benefit of local government if they so choose to get involved with that process. So there is some benefits to the community with the Army Reserve coming in here besides the presence of a Armed Forces Reserve Center being here. There's an economic impact too that we feel.

Will it counter the hundreds of thousands of tax revenue that it's pointed out is lost? I can't measure that, but we do know that we are in a position to put ourselves in place now. As far as commercial, we don't know if that's coming now or later.

Primarily we're here tonight as a result of the National Environmental Policy Act. The National Environmental Policy Act requires the Army, as part of its process, to assess the impact on the environment and ultimately human health. An environmental assessment is written. It's actually prepared over a period of six months. It takes sometimes six months, and we evaluate

the impacts on the -- basically the environment being the animals, the natural water, the spring water, the socioeconomics, a variety of different issues. And ultimately that's the document that you-all should have received notice that was publicized in late June or

early July. Okay?

So you received that. That was an opportunity for the community to have input, insight into the environmental assessment, into the BRAC process, and ultimately why we're here today, to listen to your concerns. That document lays out in significant detail the different things we've looked at and the ultimate impact that we think is there.

Obviously there's a different opinion, and you-all have some comments to that extent. We will take those comments tonight, listen to those along with what you've put into our web site and consider those and ultimately reach back and make a decision. Now one point I need to make on the NEPA documentation is, we did identify two sites in the NEPA documentation.

One of those is at 320 Cross Keys Boulevard. The other one is 320 Arial [phonetic] Road in Winslow Township. Okay? So right now our process involves two sites, the one in Gloucester and the one in Winslow. We're taking comments on both of those tonight, as we have on our web site, and we are evaluating both of those sites as we go forward.

Ultimately a final site can't be selected until the environmental assessment and the NEPA documentation is closed. The public comment period, we initially --

based on the comments we've received and input we received from the Mayor here at Gloucester, we did extend the public comment period through August 30th. Okay? I've heard concerns that the Army's not listening; you won't take us seriously. But the comments we've received and the input we've received from Gloucester is the result of why we're here tonight, and why we extended the public comment period out.

So we are listening. We're aware of your concerns. We want to hear those, and we'll work to address as many of them as we can.

The project description, the Armed Forces Reserve Training Center is about 50,000 square feet. There's a vehicle maintenance shop with it. It's approximately 7,000 square feet. There's also an unheated storage building, which is about 1200 square feet. Ultimately this -- a project of this type requires about ten to fifteen acres.

So with that, I'm going to turn it over to Mr. Mark Stousley, and he's going to describe for you what's on these mantles here and kind of more of what the Reserve Center actually is.

MR. STOUSLEY: All right. Good evening.

CITIZENS: Good evening.

MR. STOUSLEY: This is our site plan. Some of

you may have looked at your web site and become familiar with this. We will have these available for you to come

and look at after the meeting. Sorry for -- those of you in the back probably can't see all the detail.

A quick walk-through of the site plan is Cross Keys Road is along the right-hand side of the site plan that we're showing you. Some of the items as we walk through it, P.O.V. is the privately-owned vehicle parking lot. That's where the weekend soldiers will park their vehicles when they come to the Reserve Center for their drill weekends, or the full-time people during the week.

We're showing that we're going to have an access drive on the southeast corner. In the southwest corner, there's also maintenance that goes along with that. We've got storage areas. We've got mechanical rooms. Those type of things, and so we have a service drive.

It will have a controlled access gate that controls those areas.

MR. CITIZEN: Can you raise that up, please? That's --

MR. STOUSLEY: Okay.

MR. CITIZEN: We can't see it now.

MR. STOUSLEY: So we've got Cross Keys Road. This is our privately-owned vehicle parking area. We've

got our service drive that goes along the east side of the property. We located that on the east side, that's where our high line waters are located right now. Wanting to keep that on the opposite side of the site away from the existing houses that are here right now.

So our Armed Forces Reserve Center, which is primarily as Kevin said, an office building, a classroom

building and serves as a training function. Our front door is located on the east side. We've also got a service drive, maintenance, storage comes in the east side of that. In the back we have our organizational maintenance shop. That's our vehicle maintenance training area where we train soldiers on how to maintain the vehicles.

We have a military equipment parking area, which is M.E.P. Number 1, which is for the Army Reserve. We have a smaller military equipment parking area for the New Jersey Army National Guard. They don't have as many vehicles. And those are adjacent to the O.M.S. building. So that would be service, loading dock -- or service, maintenance bays in through there. We've also got a covered wash bay so that they can wash these things off after they come back from their weekend or seasonal training up at Fort Dix.

We have an unheated storage building, and that's

a place for them to park -- or to place their tents, tires and those kind of things so that we can maintain a clean access area out through here. We have provided some landscaping to make sure that we can screen these vehicles that are on the back side of that access area.

The way that the guidelines, the criteria is, the security requirements are that this building will be 148 feet set back from the adjacent property lines. We're set back 148 feet from the front. We have a service drive that has controlled access, but again, we're -- all of our facilities for the campus will be no closer

than that 148 feet from the property line.

This is a two-story facility. And the primary building component is going to be masonry. We have a -- also have some metal panels. This'll be a view from that front entry of the building. So this is the main entrance into the admin area from the privately-owned vehicle parking. Front door will come into the office area. The second floor is offices.

As Kevin said, the Armed Forces Reserve Center training building is approximately 50,000 square feet. The first floor is 30,000 of that 50,000. And the second floor is the remaining 20,000. You can also -- after the meeting come and look at the -- this is the view from the primary front. This will show again what

it would look like from the various corners of the building.

This is from the southeast corner. So you come into that service drive, what it looks from that side. And this is from the southwest corner, so this will be the view of the building from the residential areas adjacent to it. Again, the primary focus of this elevation is the administrative offices that are along here. This is from the northeast corner, and this is from the northwest corner. So again, these are going to be available for viewing after the meeting. I know a lot of you people can't see from the back.

The -- as we've talked about, the primary entry to this Armed Forces Reserve Center is on the south side of the building. Again, we've got floor plans that shows the basic layout, but just kind of a quick

walk-through.

As we come into the building -- because this will house both the New Jersey Army National Guard and the Army Reserves, they'll have separate administration areas. So we've got retention offices by the front door for the Army National Guard and for the Army Reserve. We have family support areas, and we have some learning centers. Have a lot of the area a break room and restrooms. And so this is the primary day-to-day

operations that happens at the front door.

As we go back further into the building, three -- or four of the Army Reserve administration will be housed in this area. And as we cut through the building, this will be the assembly hall. It's a 70,000 -- or 7,000 square foot area. There will be a large area for group formations, a large classroom area, very flexible area and that's where they'll also have an adjacent kitchen where they will train the troops on how to prepare meals. And so that serves as a training function and that also helps out as far as providing meals for the weekend.

Our weapon simulators look adjacent to that. In the back corner of the building we have our supply areas for both the New Jersey Army National Guard and for the Army Reserve. Once some of the new facilities -- as we are providing now, we also are including physical fitness areas. We have adjacent locker rooms, showers, restrooms. As we talked about, we've got a learning center, which is like the computer aspect of that.

As we move up to the second floor, the front part of the building again is used for classrooms. We have four classrooms of various sizes in the front part of the building. Middle part of the building is the remaining portions of the administration area for the

Army Reserve, and the back of the second floor is where the New Jersey Army National Guard has their administration area.

The assembly hall, because of its size has a high ceiling space, so that takes up both the first and second floor. And then we've got a roof below, but we don't have a second floor over the storage portions.

As far as the maintenance building, again there is a single drive-through bay for the Army Reserve, and there is adjacent storage areas for tool and parts. It has an office area. There's also storage rooms for oil, antifreeze and those type of things.

We have a single drive-in bay for the maintenance training bay for the New Jersey Army National Guard, and again they have access to the same restrooms and office areas that the Army Reserve portions has, and they too have their petroleum and -- both new and used petroleum storage areas that are going to be inside the building, plus mechanical, electrical and telecommunications. Again, there's a small floor plan here that shows what the (inaudible) storage building will look like. Again it's storage cages.

So all of these are drawn to the same scale to show how they relate to each other. These will be available for further review after the (inaudible) and

if you have any questions about the spaces that happen inside, be more than happy to answer it for you.

(Inaudible)

MR. JASPER: So you have a better description of what we've got proposed at the Reserve Center, a little bit of why we are here. To give you a feel for our proposed schedule, to talk to you about the environmental assessment comment period concluding on August 30th, from there we're working towards a construction contract primarily focused on the primary site. Now ultimately this schedule that I'm going to present to you will be dictated by our success on the primary site or alternative site.

We have not done the level of design that you see here for the alternative site. We have done a general site layout, so we know where the reserve center would fit on the alternative site. But if we have to step back and evaluate the alternative site, we'd have to also step back and do some design. It wouldn't be all that significant, but it would require some level of design effort.

The -- as far as the BRAC legislation, they actually require that the units be moved by September, 2011. So by the legislation, that's kind of the -- the wall in the sand as they say that we're up against in

dealing with the design and construction and all the decisions that have to go with that. From our

standpoint as the Corps of Engineers, to help the Army Reserve and New Jersey National Guard make that move to satisfy that legislation, we made a commitment that we would have a building that is occupiable by the units constructed up, ready to go by June 30th, 2011.

That's a commitment from the Army Corps of Engineers to the Army Reserves so they could meet the legislation. So from there, everything we do from here on out backs up against that. So the time constraint on us is part of what challenges us in addressing other potential sites. We've got two sites on the table that we're looking at that are in our processes that are workable.

Obviously some concerns with more -- with one site more so than the other. So you see what we're proposing to do. You've got our timeline. I think the suggestion's been made to -- since that you can't maybe see from the back is give you-all a few minutes.

We'll take maybe a ten-minute break here, and allow you-all the opportunity to come to the front and actually look at what we've presented here, and then we'll open it up for public comments after that. Is that okay?

So we'll take about ten minutes. You-all can come to the front and look at it if you'd like, and then we'll open it up for public comment.

(BREAK)

MR. JASPER: It was pointed out to me that I

actually gave the wrong address on the primary site. It's 389 Cross Keys Road. I apologize.

CITIZENS: We'll take the --

MR. JASPER: The other thing that I'll point out is we recognize the concerns with the that's residents here; we sold some vegetated barrier here. Obviously when we laid out this design on this primary site, we tried to consider what we expected some concerns here, so that's why we did put our service road ultimately on this side. There is still some opportunity for flexibility in dealing with the vegetated barrier on this side to try to appease some of the concerns, so the vegetated barrier on this side adjacent to the property owners could still be adjusted, and likely will be adjusted if we were to select the primary site to try to address some of the concerns.

MR. CITIZEN: There is no vegetated barrier on that side.

MR. JASPER: If we did landscaping --

MS. ?: Lawns.

MR. CITIZEN: On --

MR. JASPER: Okay, I understand. What we are going to do -- we do have a recording on -- going on for this. We're going to open it up for public comment, allow you the opportunity to voice your comment/question to us. We will take your comment/question and address it as best we can. Now the process is that you provide us your comment; we'll respond as best we can with what we have. The official response will come out in the

environmental assessment documentation. We'll take what you provide to us and give you as thorough a response as we can tonight, but officially it will be through the environmental assessment comment period that is out there.

Okay? So welcome. First comment? Yes, ma'am.

MS. CITIZEN: Hi. My name's Terri Lefferman [phonetic]. First of all (inaudible)

MR. JASPER: Yeah, use your microphone. If you could, introduce yourself and introduce where you live, your address.

MS. CITIZEN: I'm Terri Defferman [phonetic]. I live at 10 Yardley Court in Sicklerville. I'm basically right around the corner from the site. First of all I

want to thank all you guys who serve and have served in the Armed Forces. Thank you very much.

Then I would like to know -- I actually have a couple comments if that's okay.

MR. JASPER: Sure.

MS. CITIZEN: First of all, when this was first proposed to Gloucester Township, was it an e-mail? Was it in fact an e-mail sent?

MR. JASPER: The -- again, the BRAC law was started in 2005. My understanding is the mayor became aware of it through an e-mail.

MS. CITIZEN: Is that normal procedure?

MR. JASPER: We do not in our -- in our process, we do not have a requirement to coordinate directly with the mayors. Okay? In our real estate process, what we typically do is --

MS. CITIZEN: Who do you coordinate with then?

MR. JASPER: We deal with the county, the redevelopment agencies to try to identify a site.

MS. CITIZEN: So then it should have been from the county that we were all notified somehow or another?

MR. JASPER: I'm not going to say --

MS. CITIZEN: And not two weeks before this whole thing happened, but maybe four or five, six months back so we could have commented at an earlier time. All

right.

Well, second of all, I know this is going to cost an awful lot of money to the township, and although you say it's going to be beneficial to the businesses in the township, it's not going to be beneficial to the residents. In fact, what probably will happen is our taxes will go up even higher than they are now. Okay?

And then second of all, you have -- the site you're proposing, you're saying there's going to be a lot of traffic on the weekends. That road is absolutely horrendous with traffic as it is on the weekends, and there's many accidents trying to get into everybody's developments. So it's just going to make it more -- it's going to be worse for everybody else traffic-wise too.

MR. JASPER: Okay.

MS. CITIZEN: Okay.

(Inaudible 5:53)

MR. JASPER: And that is a comment we have heard --

MS. CITIZEN: Okay. And then the other thing --

MR. JASPER: -- is the concerns over traffic.

MS. CITIZEN: Then the other thing then is my last thing. Don't you think this might be a little bit counter-productive? I mean if you're going to close two

sites -- then you want to give it an update instead of building a whole new facility? Is that how (inaudible 6:08)

MR. JASPER: The Army Reserve actually has a full facility revitalization program where we try to go into reserve centers and update them and accommodate things. In many cases, the cost benefit actually, it's better to start new and fresh. Tony, I see you've got a comment. Yes?

TONY: One of the reasons that a lot of times people say what you asked us is, we have a requirement due to the (inaudible 6:43) If you remember Oklahoma City bombing, D.O.D. now says -- Department of Defense says I have to have certain set-backs. If -- if the old center, the one you're looking at, cannot meet those requirements, if we do any improvements to it we have to make it so that it meets the set-back requirement. That is a D.O.D. policy that is required.

And we have no -- there's no waivable action of that. So therefore -- and it's also cheaper to taxpayers, believe it or not, to consolidate two old centers into one. I think --

MR. CITIZEN: I think he's (inaudible 7:14)

TONY: I mean but remember, we all pay federal taxes, and so from that aspect --

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MR. JASPER: We're not talking federal taxes; we're talking about property taxes.

CITIZENS: Yeah.

TONY: I'm just saying from -- I'm just saying from the perspective of the federal government, which is what the BRAC is, it was saying how can they reduce the costs from the federal government of maintaining all these centers out there, and that's why they were trying to consolidate them. In this particular case, two other places is farmed property, so that -- they were looking at the economic value to doing it.

MS. CITIZEN: I just think it's a more sensible thing to do is to put something like this where there's no residents, or just not that close to the residential areas. I mean there's sites in Gloucester County. There's sites in Delham County that have so much farmland that there's no residents within miles and miles and miles.

MR. JASPER: Sir? Is the mic not on?

VARIOUS: Yeah. Something.

MR. CITIZEN: I'm Michael Herring. I live at 42 Carry Place, Sicklerville. I live about a mile and a half from your site at the other end of Jersey [phonetic] Road. I was a Navy Reservist for eleven years, completing 22 years of naval service.

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I full understand the needs of a reserve center and what you're looking to do here. And quite frankly,

I have no problem hosting a site like this in Gloucester Township. My only concern is the specific site that ws chosen. I could give you a firsthand knowledge of the economic value of Gloucester Township. It's insignificant.

If you're going to feed your soldiers who are here on the weekend on site, then the best we can hope for is that they stop at the store or they stop to get gas on their way in and out. If you have a reservist that lives more than fifty miles away, the Army puts him up overnight, there are no hotels in Gloucester Township anywhere near this site. There are some in adjacent communities. They would see that economic value.

Those soldiers who stayed overnight may go to the restaurant on Saturday night when they're here. I know I did that a number of times when I'd go out of town. But they're more likely to go to the restaurant next to the hotel, which again, is outside of town. So you can't ask that we're going to see any economic benefit. In fact, the road that you're building on is a county road, and there's a need for traffic lights on that road as it stands today. Your facility will only exacerbate that problem. And when the county puts those in, my tax

dollars pay for it. And that right there will wipe out any benefit that -- when they add that cost to us on.

So your alternate site in Winslow, close enough here, any economic benefit my businesses and my community would receive certainly would see the same benefits from that facility that they would see from this facility. So -- and you need to understand

something about the host community you're talking to here. Gloucester Township already hosts three major government entities from the county; the County Vo-Tech School, which is just down the street and across this area; the county college, and the county health complex. We've received zero tax dollars from that ratable land because we're hosting those facilities.

You're asking us to add a fourth major piece of property at a location that's currently on our master plan to be sold for commercial development. It may be ten years before we see that site developed, but there's a tax revenue somewhere in our future from that if you don't build on that facility. So that's in essence why as a resident I would be complaining about this process.

And to the representative from the Secretary of the Army, shame on you. You did an environmental study to worry about whether we are displacing owls or chipmunks or squirrels and not about the community in

here. You gave more thought to wildlife than you gave to the residents. We are coming to the final days of this project where we're fighting an uphill battle against a decision that's pretty much already made. Shame on you for not getting the people involved far more. That's bad public relations, sir.

MR. JASPER: If I could, let me -- excellent comments, and great local perspective that puts into perspective some of the -- I'll say the whole sales issue and things like that.

One thing I want to make clear with everyone is

no one within either township has presented to us that they don't want the Army Reserve or the Armed Forces from the New Jersey National Guard in their township. I don't believe that is the concern we are here about today. They've been very supportive. What we do understand is they'd like us located in a place that is better served for them. Okay?

So I don't want anyone to take away from here that we feel that we're not welcome in either one of these communities, because that's not the case. In reality, they have made us very welcome. They've worked with us, and we're going to work with them to try to reach a resolution that is amenable to all parties. All right?

CITIZEN: Here's a seventy-acre site next to (inaudible 12:13)

CITIZEN: There you go.

MR. JASPER: Next comment, please?

CITIZEN: (Inaudible 12:16)

MR. JASPER: Next comment? Let me go to the back. She's had her hand up for a while.

MS. CITIZEN: I'm really aggravated now. Hi, I'm Debbie Vegas [phonetic]. I live on Atlantic Acres [phonetic]. I'm not too far from where this is going to be. Just a couple things.

Personally I support the military, and this is nothing personal against the military. My family's been involved with the military for years. God bless them and what they do. But in terms of like how -- when you say that nobody's upset about you coming, I didn't find

out about this at all 'til the end of July.

CITIZEN: Right.

MS. CITIZEN: That's the first I heard of it. I had no information at all. I haven't made a decision one way or the other, but you know, looking where this is, where the property lines are, I'm really upset for those people who have to live down there.

CITIZENS: Yeah. Yeah.

MS. CITIZEN: I mean you can't say -- you cannot

possibly honestly say that nobody's upset about this. Nobody knew about it 'til the last minute, and then it's like -- and it does seem like decisions have already been made without taking any of us into consideration. That's just -- I just find that totally inappropriate.

MR. JASPER: Very good. Sure. And I apologize if I presented no one's upset. Obviously there are people upset. What I was trying to point out was that the townships, the mayors, the council has been more than willing to work with us. Okay? To try to make something work out from a government standpoint. And obviously there's concern with the locations that we've identified. Okay?

Yes, ma'am?

MS. CITIZEN: My name is Tina Burra [phonetic]. I live at 948 Carriage Lee Road. It would be that last house you can see on the picture right there. So obviously I really don't want this right here.

And to tag line to what that gentleman over there was saying, he's talking about the economic resources

that we would see from -- or not see from this facility, more of the residents that are going up against this facility are more concerned with their property themselves, the enormous taxes that we currently pay, and now our houses are seemingly going to be worth even

less than they are in the current market, which is one of the reasons why we care it to be somewhere else.

Also, somebody else had mentioned about Cross Keys Road being unbearable. In your environmental assessment that I reviewed, it does mention about the four lanes proposed highway, which you should know has been seemingly frozen since they completed it down in Borough Land and also down towards the business district and Cross Keys Road. So the fact that you say that it's going to seemingly be extended is a joke to us because we've been living with it in the frozen stage for four years at least? And our town council had addressed that before and they have no knowledge of when it's going to continue either, for the mere benefit of the residents that travel it on a daily basis.

Here is a road that you can't see in the picture. You cannot make a left-hand turn out of there without risking your life.

MR. CITIZEN: True. Right.

MS. CITIZEN: And it's only one lane each direction, so it backs up endlessly when somebody's making a left-hand turn onto -- or onto to (inaudible 15:24) Road. And I also just want to make some other comments that are in no order and are somewhat random.

So are we to understand that you're going to

currently -- your current facility (inaudible 15:37) are going to seemingly abandon and offer it back to this -- to the town to purchase from you, most likely seemingly more expensive than when you purchased it from them? Why can you -- I under -- I heard what this gentleman said about it's turned out to be cheaper. But why not just demolish it if it's already in a great location? You're only talking about 140 feet in every direction on the set-back. That's as long as my driveway.

Also in your plans it talks about a vault on the premises. If this building is to have no live or blank ammunitions, what is the vault going to contain?

MR. JASPER: The soldiers do have weapons.

MS. CITIZEN: Right. But you said there would be no weapons --

MR. JASPER: I understand. There is -- no, we never said there'd be no weapons. We said there'd be no live --

MS. CITIZEN: You said --

MR. JASPER: We said there'd be no live or blank ammunitions being fired. Soldiers, they're inherently -- that is part of their --

MS. CITIZEN: But this is going to be a college learning center.

MR. JASPER: Soldiers train with their weapon.

That's what we have, a weapons simulator where they train. When they go to their -- when they go to Fort

Dix, they will take their weapons. Now but we secure those weapons in a vault that is alarmed and that's secure. I mean there are certain parameters we have. But there would be no live -- there'll be no ammunition there. I mean it's just -- it's the weapon. No ammunition. It's not going to be stored there. We won't have any. That's not going to happen.

MS. CITIZEN: Right. I also would like to inquire about the noise ordinances, that you seemingly don't necessarily have to follow our township rules. It is our understanding that your Army Reserve and National Guard members will be training every weekend, because you're going to alternate the seven units that will be using that facility. So I would imagine that all four weekends of the month are going to be used.

So when we're in our pools in our backyards, what time of the morning will the training begin, as your parking facility's in my backyard. What time is that machine shop going to gear up? What is your daily schedule let's say during weekend training? What time do you begin?

MR. JASPER: Most of the weekend trainings will start around six-thirty, seven o'clock. And those --

well, most of the trainings are going to be indoors.

MS. CITIZEN: Except for the people.

MR. JASPER: It's all indoors. The organizational maintenance shop is all indoors.

MS. CITIZEN: My husband's son owned a maintenance and repair for years, and so has (inaudible 18:19) down the street, and we can hear them quite

plainly when they work.

MR. JASPER: The level of maintenance that's going to go on here is mostly training. There's going to be no heavy -- the level of maintenance that goes on in these facilities is not the type of maintenance that I think you're --

MS. CITIZEN: Okay. You're saying that this --

MR. JASPER: The level of maintenance that goes on in this training bay is more like going out and checking the tires. It's a driver level maintenance, or it's a user level maintenance. It's most the level of maintenance that you would do as an owner of a car yourself. It is preventive maintenance type stuff. There's -- they're not going to be pulling engines out of cars. They're not going to be doing heavy -- well, you know, changing the tires, stuff like that. It's more training that goes on inside the facility. It's usually inside the bays, and again, anything heavier

than that, we usually send to Fort Dix to an equipment concentration site or a larger maintenance facility to do that type of maintenance.

MS. CITIZEN: What kind of 61 vehicles are going to be stored on the premises? Trucks?

MR. JASPER: There is going to be --

MS. CITIZEN: What kind?

MR. JASPER: -- from the National Guard perspective, there's going to be -- just from our units it's going to be three L.M.T.D.'s, which are small troop carrying vehicles, and then Humvees. Three Humvees.

MR. @@: And I believe that's basically the composition of the Reserve vehicles that are going to be there, basically Humvees.

MS. CITIZEN: Are these (inaudible 19:38) vehicles?

MR. JASPER: In the trailer, it's going to be all the tonnage and equipment that they need to go to wherever they're training.

MS. CITIZEN: Forty trucks?

MR. CITIZEN: No personnel?

MR. JASPER: I can't speak for the Reserve. The --

MR. CITIZEN: No personnel on the trailers.

MR. JASPER: On trailers? Absolutely not.

MR. CITIZEN: Where are they being housed for the weekend?

MR. JASPER: Most of the soldiers during the drill weekends either come in in the morning and leave in the afternoon, or they'll be going to another facility if they're doing it overnight. They almost -- matter of fact --

MR. CITIZEN: (Inaudible 20:07)

MR. CITIZEN: Troops don't go in trailers.

MR. CITIZEN: Yeah, there's no trailers on --

MS. CITIZEN: Yes. There will be forty trailers.

(Inaudible 20:18)

MR. JASPER: But that, that's mostly to carry -- again, there is equipment that's going to be stored at the facility for the soldiers. They -- everything that belongs to that unit is going to be stored on that

location.

MS. CITIZEN: (Inaudible 20:28)

MR. @@: Well, not just there, but you saw a bunch of storage facilities here on the first floor. There's a bunch of supply rooms in there, and that's all the soldiers' gear and equipment they take with them, whatever it is they need to do their job. Everything is stored at that facility, and when they go train, either at Fort Dix, Fort Drum, or go to a deployment, all that

stuff has to get packed up. They take it with them.

MR. JASPER: Hopefully that answered your question.

MS. CITIZEN: It did. I've lost my mental conversation, so I'll come back on -- the reason why I said. The people -- I know that then the trucks are diesel or not, because obviously the noise level is much different on a diesel vehicle than it is on a regular vehicle. I also would like to point out, my letter that I sent in personally, I was a little bit annoyed with some of the inconsistencies and misguided statements that were made in the environmental assessment.

It's seemingly me, our single family homes that are adjacent to it seem like they didn't matter, like it was only five homes when in fact there's 25 single-family homes directly there. So they didn't even count the -- I know you're only worried about the people who butt up for 200 feet, but the residents will be able to see your property from across the street are also concerned. Again, I'll come back -- collect my

thoughts.

MR. JASPER: Okay. I went left; I'll go right. Back corner there?

MR. CITIZEN: I'm Charles Ward [phonetic] (inaudible 22:19) I seen how things happen besides this

thing -- board coming up with this now from when we had the (inaudible 22:28) and nothing ever happened with that. You know, everybody had deaf ears. And you know, just blown off. And then everybody has all the problems with water. What are you guys going to do with the water we pull off this building? Where is that going to run to? It's going to run behind people's properties? We already have a bad problem with water waste on Cross Keys Road as it is.

MR. JASPER: Okay.

MR. CITIZEN: And it floods unbelievable. Now you're going to add a big building there. Where are you going to put the water that run off that? Plus, you were talking about closing up two other facilities. Why couldn't you guys use the old Monkey Basin? We do that. You have 33 acres there of just wasted property -- wasting taxpayers' property. Are you guys using (inaudible 23:13)

Now when this gets done, maybe fifteen, twenty years after (inaudible 23:17) what, is the taxpayers going to pay money for that too because it's wasted land? What are you guys going to do with wasted land that you're using in Pennsauken and Camden then? We'd like to know all about that.

MR. JASPER: And as far as the water on the site,

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we have designed the facility with some retention-detention ponds, some of the lighter color ponds that you see would basically be utilized to service the water on-site. The design is such that the water is retained primarily on-site. We believe our design allows for the flow away from the residents that's here. It should have no impact on those residents.

MR. CITIZEN: We believe; we don't guarantee?

MR. JASPER: Our design is set up such that it does.

MR. CITIZEN: Are you sure about that, because they said the same thing with those, and now my property and my basement gets flooded with water every time we get a torrential rain now. We've had a lot of rain recently, and the last -- what, fifteen days we've had about fifteen inches of rain around here. Unbelievable.

Now they say a hundred-year storm, and that happens every -- almost every other day now. I mean we just don't get, you know, a half an inch of rain that we used to get. We get three inches of rain in a -- you know, a downpour. And we -- this is going to have worse problems than you guys even think could happen.

MR. JASPER: We are designing the site to meet the local requirements, wherever we're going to put it.

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In Camden County, we're working with the State submitting our drawings to them for their approval as

far as the storm runoff. The proposed site is actually lower than the adjacent area, so we are accommodating run-off. We've got topographic surveys so we know that the existing drainage of the -- of the area, and the houses that are along the west side, that property is actually higher than this property. So again, you're not pushing any storm run-off onto adjacent property. We're containing it all within the site. And we are following the State requirements as far as submitting our plan for their approval. Okay.

MR. CITIZEN: And another question is McCloskey's Road. Are we going to be to handle all these trucks that you guys are going to be using constantly coming down here with the tremendous amount of traffic that we have? It's unbelievable that, you know, we have a back-up down there, plus these railroad tracks is that everybody has to stop there because they put a big -- a stop sign there instead of just (inaudible 25:47) railroad tracks.

But when you come down our end, it's unbelievable, and as Homer was saying, you know, here's a road. Nobody can get in; nobody can get out, and when you do, you're going to end up having accidents. I mean

that's as bad as when we had the J.C. Expressway, and we're building that now. I mean it took everybody to have an accident almost every week to have a light put up. I mean what, does somebody have to get killed around here before something happens?

I mean it's ridiculous. And then you guys want to cause more traffic jams because you -- I know you

guys don't drive that fast in those Humvees and stuff. I mean what's the difference of that? I mean are we going to get the roads built before you guys put this building up, or are you guys going to build it anyway and just don't care about the traffic?

MR. JASPER: Traffic is a concern obviously that we've heard. We need to look at that and I will respond back to that in the environmental assessment. Okay? We obviously recognize traffic is a concern in this area that needs to be looked at, and we'll give that consideration as we go through it. Okay? Sir?

MS. CITIZEN: You don't want to talk to me.

MR. JASPER: No, ma'am.

MS. CITIZEN: Do I need to stand up?

MR. JASPER: I'll let you go next.

MR. CITIZEN: My name is Joe Lefferman [phonetic]. My name is Joe Lefferman [phonetic]. I basically live around the corner, 10 Yardley Court.

Bottom line, I'll make this simple and sweet. Okay?

Just -- I see nothing positive, but I do see a whole lot of negative. Bottom line is, I think I speak for everybody in here, we really don't want this here. You need to put this somewhere else, bottom line. I mean what -- we're all just saying, bottom line, we don't want it here; it really should be put somewhere else where there's not a lot of residential homes. We really don't need this here.

(Applause)

MR. JASPER: Go right ahead.

MS. CITIZEN: My name is Lisa Cowan. I live right where that swimming pool is on (inaudible 27:30) Court. Listening to everything that's being said, and I am ready to scream. I'm hearing things that are not true. The land is not considerably lower than my property. We have major run-off problems.

You're talking about putting in a lot of paving, and flat buildings that cause more run-off. We all have well water. What's going to happen to our wells when you start building, and making all of this added commotion on the property? The traffic is horrendous as has been noted.

What about sound barriers? The line of trees that you have there does not exist anymore. It takes a

great deal of time to put up what has been taken down in 2007, eleven acres of woods. We have displaced animals. Now we're going to have displaced people. Our property values will go down. They've already gone down with today's economy. Our taxes are about to go up, and you're not helping that by putting a property that is tax-exempt there.

I'm not happy about anything going there to tell you the honest truth. There's one tree left there from my child -- my children's childhood that stands in the center of a field that was solid woods we used to walk through.

MR. CITIZEN: That's not right.

MS. CITIZEN: It's been said that it was a farmed property. It was not. It was solid woods with a little pig farm. It wasn't a field full of crops and animals

as said in the E.A. report. Forty-eight residents were supposedly notified and no significant negative comment was made. That's what your report said.

That came out before we even received a letter. And I (inaudible 29:23)

(Applause)

MS. CITIZEN: It appears when you read your E.A. report that it was a fill-in-the blank paper. We are not Camden. We are Camden County.

MR. JASPER: Very good.

MS. CITIZEN: There is a difference. And many things in that report were not true, not true at all. I went out when they were out there testing the soil. I inquired as to what they were doing.

We're testing the soil to see if it's buildable. It's buildable. What are they going to build? Oh, maybe something with the Army. The person that was there knew darn right well what was going there and didn't say. Now I have a neighbor that just spent $40,000 improving their backyard. They're going to be looking at this.

What about the nighttime? What kind of lighting are you going to have? What kind of control do we have over that? And you're telling me it is going to be nice, quiet weekends? We enjoy our swimming pool and our backyard. It's been a peaceful place. And now it's not going to be a peaceful place.

We're not happy; nothing against the military. But please go somewhere else.

(Applause)

MR. JASPER: A lot of Lisa's comments are documented in the E.A. I believe she did submit a comment through the E.A. process that you've hit on a lot of the same ones. One thing I'll hit on as far as

-- you're correct, the elevation may be higher now, but realize when we're talking, we're talking about the as-designed proposed site being lower and the retention on the site. So we're looking (inaudible 31:07)

MS. CITIZEN: We have a (inaudible 31:09) problem already. How do you control that when you have (inaudible 31:12)

MR. CITIZEN: Retention pools. That's (inaudible 31:15)

MS. CITIZEN: How can you go in the yard and enjoy the day and not be (inaudible 31:18)

MR. JASPER: Okay. Sir?

MR. CITIZEN: My name's Dennis Palmer over int eh Blackwoods (phonetic) section. I wrote a letter back July 30th in response to the (inaudible 31:32) couple comments I want to add to it. First I disagree with the findings on Table ES-2, which the executive summary says there'll be no significant impact. I think there will be significant impact on land use, on residents, noise, traffic. There's only a two-lane road. It'll impact the property values, loss of (inaudible 31:48), negative impact on the neighbors right to quiet enjoyment of their property.

I disagree with Page 1-dash-4, item number 1.5, using 2008 as the baseline. I think you should use the

2007 pre-clearing baseline. Why? Because it was a no-action alternative, it would have Old Field's succession back to a wooded site to bring back the species that would have been there if there was a no-action alternative. Again, I never really heard their answer to the woman's question on how many of the 61 vehicles are diesel. It's kind of a mish-mosh. It was five of one up here. There were some questions.

How many will be diesel? How many -- how many of the Humvees are diesel and how many (inaudible 32:29)

(Inaudible 32:36)

I guess a quick recognition, the gentleman in the nice suit and glasses over there, which kind of sums I think a lot of where we are today. He said (inaudible 32:45) He'll be working with the State and the County. What happened to the township? That was a huge empty space there.

MR. @@: That's right.

MR. @@: Now with Section -- Page 3-dash-1, section 3, alternatives, there are other locations that should be looked at and (inaudible 33:08) those areas can have other synergies under their work, and they're already projects off the tax rolls. I also disagree with respect of the relocating of diesel powered equipment and noise.

It's activities that raise questions, and these were in my letter. It's not to read everything on it,

but again question the noise, what's happening in the morning; what's happening with the folks when they get off and their quiet enjoyment.

I totally disagree with the prior farmland statements under 4-dash- -- 4.6.1.3, that no tax on prime farmland should be expected. The economic impact is that -- and this is a huge point. If you go in and there's no -- I'm paying taxes. Don't say because it's been already zoned commercial that the township's given (inaudible 33:58) can be developed commercially, not developed commercially.

A commercial site does not have 61 diesel vehicles out there running. A truck or two a week for deliveries. Maybe if somebody drives a big Ford 350 with a diesel on it, but not 61 diesel trucks out there (inaudible 34:14) quality of the area. Again threatened endangered species, obviously the folks living next door probably feel threatened and endangered. The R-4 state ground species on this site -- or identified on the E.A.S. that could be on this site, there are four either threatened, endangered or sensitive species on the D.P.

The fact that you let it go to a no-action alternative, and it did have Old Fields Succession, that

whole site could go back through succession to a wooded site and actually improve the habitat for I think both the animals and the people that live next door.

Socioeconomics is a whole big old flaw in this project. You've totally missed major aspects on the socioeconomics. Other speakers earlier tonight, you know (inaudible 34:56) we already have a

disproportionate burden on this township from non-tax paying properties. Lakeland's 500 acres. The county college is 320 acres. Vocational school has 1100 students at that site.

Slim Branch is sixty acres, and then to have this C.Y.O. site's going to be 60,000 (inaudible 35:19) not enough paying taxes. Do you know -- are you aware that over ten percent of this township property is facilities like that that aren't paying taxes?

MR. JASPER: It has been pointed out to us; yes, sir.

MR. CITIZEN: Well, I am pointing it out again now too. That's a huge -- and your socioeconomic impact misses all those aspects, all those points. It's all a waste like you're not recycling. You're not doing any recycling on this site. Think you were trying to be environmentally sensitive and the environmental impact statement or assessment, what are you doing on recycling

and recycling issues?

Cross Key Road we know is only two lanes. And right now (inaudible 36:00) toward 2009-2012, it's not in there. It's not in the (inaudible 36:05) plan. Practical long-term planning goes out to 2030. Maybe, that's a long window (inaudible 36:13) and not to be addressed. Huge window.

Basic conclusion, I believe there are other sites. Other members have spoke about it. Other county facilities are already here. I would happily be synergy that could be developed. (Inaudible 36:27) you could

have students who could learn how to do electronics, the maintenance and other things and if we wanted to make a progression into military, you could have a leg up. You could and have an improved -- you can have an improved trained employee coming in as a Guardsman or as an active, and it seems to me it'd be tremendous synergy to be done locating something on a site that's already not paying taxes. As I said, we already have a huge burden in this town, and I believe it's there's a fatal flaw in the economic study.

You left that out. You didn't look at that. Thank you.

(Applause)

MR. JASPER: (Inaudible 37:02) comment, which he

has submitted in a letter format to us, so I believe we've got his comments through the E.A. process. So we will address those in the environmental assessment response. Yes, ma'am? Yes, sir? I apologize.

MR. CITIZEN: No, I'm sorry. Ma'am, must be the hair. My name is Patrick O'Donnell. I live at 60 River Drive in the Forest Ridge Development right on Kiersley Road. Kiersley Road is a disaster. Okay?

This project, Cross Keys Road is in a very environmentally-sensitive area. On the west side is head waters of the Timber Creek that empties into the Delaware River. On the east side you have the Mulacey River, and it starts in Adco and Berlin Township, and that empties into Mullakin Bay (inaudible 37:53).

And right across in New Brooklyn is the head waters for Creday Carver Bay River, that whole system.

That's a very environmentally-sensitive water shed that would not only affect everyone's drinking water virtually in south Jersey, but all the wildlife in between because you're storing diesel products and other stuff on this site. And our history with National Guard, they set fire to the woods. They strafe the elementary school.

There have been countless mistakes made by the military. You know, mistakes happen, and this is a

residential area. We live here. Would you want this next door to you, you or you? Would you? Would you have a real good time with your property values in a real tough economy? This is a disaster for us. There are far better sites for this.

I can think -- the county has one called the Pennsauken, you know? And it has better roads. The infrastructure's there. You don't have to worry about sewage. You don't have to worry about water. Put it somewhere else. Thank you.

(Applause)

MR. JASPER: All the way in the far back?

MR. CITIZEN: I'm Dave Vegas. I live at Land of Acres. Basically this is in the form of a comment.

If after all you've heard, traffic, environmental, economic and every possible thing, any logical person could not possibly feel this is the best place. So this is a real -- the final decision's real interesting for me, because if you keep it here, it basically says you really don't give a damn about the

people, and we've all wasted a lot of time tonight.

MR. CITIZEN: David, very good.

MRS. CITIZEN: Yeah (inaudible 39:56)

MR. JASPER: And to that extent, let me -- let me say this. Someone else made it that they felt the

decision had been made. I want to -- rest assured that the final decision has not been made. I can assure you of that. Why we are here is to listen to these concerns and work to see if we can address them to mitigate them or to move to our potential alternative site. If our alternative site won't work for us, possibly open it up from there. But we do have two alternative sites that we're looking at.

Obviously we're hearing significant concerns about the primary site, but I want to reassure you that the final decision has not been made and it won't be made until the full NEPA process is completed. Okay?

Ma'am, you've been waiting for a few minutes.

MS. CITIZEN: My name is Nancy Conn, and I have been a voting taxpaying resident of Gloucester Township since 1979. The first thing I would like to say is that -- not to waste anybody's time, but I agree with everything that's been said at this microphone up to this point. So I just wanted to make that point.

I want to piggyback on some of the things other people said. One gentleman mentioned that -- I believe he said the architect is being paid by the U.S. Army in order to come up with this, so naturally the work that he does is going to favor his client, and I want to say that's the same for the environmental people. The

environmental study was done, and that was done in order -- you know, they were -- who were they paid -- or who was their client and who was (inaudible 41:24) going to support? We also talked about the history of our problem with environmental studies.

There is someone else who wanted to do a large piece of work. Someone asked if there was swamping on the property. They said absolutely not; no way. And then later all of a sudden -- and I guess that's project didn't go through because of the economy -- all of a sudden, oh, my god, there's swamping on the property. And he got a million dollars in Camden County in order not to develop the property. So we have a little problem with trust and that is certainly something it would be really good if the environmental study was done by an independent and not someone being paid by the people running their project.

Also, I was wondering -- you said that you have a lot of experience, that a lot of the professionals that are here this evening traveled not only on the east coast but around the country doing projects like this. And I would like to know, in your experience -- this is the first of my questions -- in your experience, what percent does the homes' value drop when a project like this is put in their neighborhood? What percent can we

expect our values to drop?

Now they've already dropped about forty percent

from the economy. Now how much more are they going to drop?

MR. JASPER: I can tell you, I don't -- I don't believe we're going to have an answer for that now. I don't --

MS. CITIZEN: You don't know that statistic?

MR. JASPER: No, I don't know that statistic.

MS. CITIZEN: Okay. And I will be contacting the mayor's office tomorrow. I know this is not the time, but I will be contacting her in the morning to find out at what point they're going to drop the property tax of the residents who pay a significant amount in taxes in this area, and I'm presuming it'll be dropped retro to when you make the decision to put the project in.

Also, you quoted -- I think you're trying to make a case. You're quoting, well, there's -- this is environmental law and so this is the way it is. This is all. This is what we have to do. And you keep referring at least three times in the last half hour about the -- you know, environmental study, we'll look at it.

I spoke with a zoning and land use attorney today, and he told me that the -- whenever you do those

environmental studies, they're considered to be drafts, only because the public hearing hasn't been heard. But they're usually not changed after the public hearing is concerned. So I have a concern as well that that -- it is what it is, and it's just a formality to have this hearing this evening. And then it becomes stamped as final. And I just want you to know I'm really concerned

about that.

And also what the last gentleman said. Whenever -- since you keep bringing up the law, what the law usually looks at is what is reasonable. And this is not reasonable. So I would like to bring up the fact that I have that concern.

And then the last thing is, I spoke to a couple of police chiefs and the Camden County Sheriff's Department regarding the security, you know, at the McGuire Air Force Base. There was almost an incident which -- from some local terrorists, and I talked to them about what's the plan. What happens if this facility comes in here and then, you know, terrorists get these crazy ideas, and like you said, there is going to be some ammunition, some weapons on this facility.

And they explained to me that Homeland Security's a federal job, that every municipality has a liaison who interacts with the federal, and that the facility will

have to be there for some time before they can assess what support they need and what the cost is going to be to provide the support that is needed. So how is that handled? And I don't know if this is a question for your professionals, or for the Township? How is that cost going to be handled to make the County, Gloucester Township, Winslow Township, everybody involved safe? How is that handled?

MR. JASPER: Well, there are alarm systems. Do you want to take it? The Army -- the Army -- I trust you. The Army won't charge the city, the county, the

state or -- for that protection.

MS. CITIZEN: Taxpayers do pay for the Army.

MR. JASPER: No, no. The Army's not going to send you a bill --

MS. CITIZEN: No, I know you --

MR. JASPER: -- for protecting you.

MS. CITIZEN: No, we pay taxes. We pay taxes.

MR. CITIZEN: We pay you.

MR. JASPER: No.

MS. CITIZEN: I don't mean it in a negative way. I'm glad you're here.

MR. JASPER: (Inaudible 45:27)

MS. CITIZEN: We pay for our military. So what I'm saying is --

MR. JASPER: Right.

MS. CITIZEN: -- there's somehow in a local government -- this the way I understood it.

MR. JASPER: Yeah.

MS. CITIZEN: There's a local liaison for Homeland Security.

MR. JASPER: Exactly. Exactly, the National Guard is part of that. The Army Reserves is part of that.

MS. CITIZEN: Right.

MR. JASPER: When that Homeland defense coordinative person from whatever --

MS. CITIZEN: Right.

MR. JASPER: -- local municipality needs help, when he needs help -- right? He gets it from the National Guard. He gets it from the Reserves. He gets

it from the big Army or federal employees, who -- whatever's appropriate. In other words --

MS. CITIZEN: So it's not going to be any additional. It's just what we already pay to the federal government? Thank you so much.

MR. JASPER: Yes, ma'am.

(Applause)

MR. JASPER: I'm moving back.

MS. CITIZEN: Hi. My name is Kirsten Mallanacky.

My mom is Lisa Cowan, and we are on Kennel [phonetic] Court. I'm interested in knowing what types of chemicals will be used on this facility, the handling procedures and disposal procedures of those chemicals. That is something that I didn't feel was adequately addressed.

MR. JASPER: Okay. The primary -- the chemical primarily utilized basically will be the fuels, petroleum, lubricants, cleaning solvents, particularly for vehicle maintenance. That would basically be what it would be limited to.

MS. CITIZEN: And the handling procedures and disposal procedures?

MR. JASPER: These facilities, there's actually a room for a controlled waste. There's actually two rooms where those materials will be stored actually in the vehicle maintenance facility. So they're stored there, and then there will be separate contracts to manage that material monthly, weekly, or whatever volume needs to be addressed.

MS. CITIZEN: And what kind of an assurance can we have that this isn't going to end up in our backyards and in our wells and in our ponds?

MR. JASPER: The only assurance I can give you is that all the federal, state, local regulations regarding

environmental contaminants and responsibility for those will be followed by the Army Reserve. We add our local regulations that in the Army Reserve, New Jersey National Guard, many times are more stringent than what the state and locals are. Now what we have to do is have plans and policies to implement those with the soldiers who are active duty.

MS. CITIZEN: Thank you.

MR. JASPER: All right. Let me go to the back. Yes, ma'am?

MS. CITIZEN: Hi. My name is Lynn Hill, and I live at 1 Kiersley [phonetic] Court. I don't have a problem with the Army or Navy. I just don't want it in my backyard.

I don't know how many people remember Janet's landfill --

MS. CITIZEN: Oh, yes.

MS. CITIZEN: -- and the contamination that was caused by the (inaudible 48:17) water for our children, kids that were sick, born deformed, people moved. This is all going to be -- I don't care what you say -- in my well. Unless you're going to give us all city water, this is a big problem. And I like every one of you.

Any Saturday, Sunday, come and stand on Kiersley Court or Cross Keys and Kieras Lane and see the traffic.

See what I go through that people come through my area on a dead-end street and have nowhere to go. Then they go into Diane, and then they go into Kenwick and then they try to get back out again. It doesn't belong here. You need to put this someplace else.

But my main concern is our wells. They will be contaminated with diesel fuel. Thank you.

(Applause)

MR. JASPER: One thing I will point out in regards to the fuel is we will not have bulk storage tanks located on this facility. Okay? So it's not bulk storage. It's basically minimal volumes to address the maintenance needs for the training of the motor vehicles. Huh?

MR. CITIZEN: How far would (inaudible 49:25)

MR. JASPER: I'm going to say maybe --

MR. @@: Two, two and a half miles.

MR. JASPER: Yeah, three. Three miles.

MS. CITIZEN: The same concerns will be there will.

MR. CITIZEN: Concerns are going to be there too.

MR. JASPER: Okay.

MS. CITIZEN: (Inaudible 49:31)

MR. CITIZEN: So they're not even in the woods.

MR. JASPER: Yes, ma'am.

(Inaudible 49:39)

MS. CITIZEN: Joyce Dallas, 25 Fox (inaudible

49:42) Drive. I'm kind of on the other side, but I expect it too. I just wanted to mention that there's elements that we're not mentioning. There are a lot of seniors, and I happen to be a senior citizen myself, who are very concerned about the taxes and the improvements and things that are going to be made, and about how the sewage is going to be handled and that kind of thing.

And we're hanging on by our fingernails trying to stay in New Jersey because we love it here, and I agree with 98 percent of what has been said, maybe 99 percent. But I think that this is something that we really need to really do some serious thinking about before we do it. And I love the military, have family that's military. That's not the problem.

But it's just that, thinking in terms of how our taxes are definitely going to have to go up, I speak for the senior citizens and there are quite a few of us in this room. Thank you.

MR. JASPER: Thank you. Sir?

MR. CITIZEN: My name is Mike Manella [phonetic]. I live in the White Oak Development, and I just have one comment and one question.

My first comment is, how could a township, you

know, who -- embrace an initiative like this when they're five and a half million dollars in debt? And they realize that they're already heavily burdened with tax-free properties that they're not getting additional funds from. That's the first question -- or comment I should say.

And then the question I have is, after all the

interaction tonight, and all the discussion, in what manner will we hear a response as to whether or not our communication and commentary was effective in changing this site? I mean how are we going to know that? What communication will things (inaudible 51:35)

MR. JASPER: The --

MS. CITIZEN: (Inaudible 51:40)

MR. JASPER: What we'll -- what we'll take here is take these back and include them in our environmental assessment documentation. So when we respond back with the environmental assessment, we will address the comments that we've received through the written documentation and verbally here now. Ultimately there's going to be a decision on where the site will be located, and obviously that will weigh into it too.

But it's basically through the environmental assessment documentation that it will come in. Okay?

MR. CITIZEN: Yes, sir.

(Applause)

MR. JASPER: Way in the back.

MS. CITIZEN: Hello. I'm Linda McGloughlin Blackwood. Obviously you have -- there are a lot of people with concerns. One of my concerns is with the -- with the economy that's been going on the last couple of years, why would you not target a piece of property that's already tax-exempt as opposed to taking out -- in this situation, you're taking out $500,000 out of my pocket a year using this facility. That's the money that we're going to lose in ratables.

That means two cents -- okay -- of our taxes are essentially going to be going towards your project because we're not getting it. You know, right now we are trying everything that we can do to keep our taxes down, and this is just one more thing that we're fighting against. All the mandates that are coming down from the government that we have to fund, we're not getting money from the state; we're not getting money from the government, so now you're taking more money away from us.

So it really upsets me that, you know, that process wasn't considered. You indicated at some point about alternative sites. Are you truly open to alternative sites?

MR. JASPER: Yes, ma'am. We've got an alternative site in our NEPA documentation.

MS. CITIZEN: And I understand that's in Winslow, and I understand that there are some issues over Winslow.

MR. JASPER: Yes, ma'am.

MS. CITIZEN: So the issues in Winslow may be something that does not make that attractive. So if it's not Winslow, are you telling us it's here and no other option?

MR. JASPER: At this point, no, I won't say that. Okay? We have sites, and we're going to assess both of those sites, and you're correct, there is challenges we face with the Winslow site also. But if we can work one of these two sites, that is our preferred choice and our best method to accomplish what the BRAC legislation

requires.

MS. CITIZEN: And I understand that the issues over in Winslow are sewer-related?

MR. JASPER: There -- as we understand --

MS. CITIZEN: (Inaudible 54:20)

MR. JASPER: -- there is a sewer moratorium that we're trying to work through, understand what that moratorium is and ultimately how we could work with the local governments to potentially deal with that

situation.

MS. CITIZEN: Okay. You know, someone had mentioned Pennsauken. Was that site ever considered, maybe Pennsauken. It's a huge piece of property that -- there were many things that were proposed that -- to be done on that site that have fallen through.

MR. JASPER: I'd have to have an address.

MS. CITIZEN: (Inaudible 54:51) the accessibility to 73 and -- I mean --

(Inaudible 54:56)

MR. CITIZEN: On the intersection of Route 73 and Route 130.

MS. CITIZEN: Right.

MR. JASPER: Okay. What we can do in regards to that -- Route 173 and --

MR. CITIZEN: And 130.

MS. CITIZEN: 73. 73.

MR. CITIZEN: 73 and 130.

MR. JASPER: Okay.

MR. CITIZEN: Just a couple of miles from here

(inaudible 55:09)

MR. JASPER: Off the top of my head I can't say whether it was or was not included. We can go back in our reports and see if that site was. How many acres is it?

MR. CITIZEN: Huge.

CITIZENS: Huge. It's huge.

(Inaudible 55:19)

MS. CITIZEN: And I know you had indicated that you don't have to work with the township. You know, generally there's a courtesy involved whenever there's governmental entities that come in. That courtesy was not given to Gloucester Township. However, I understand it was given to Camden County. How long have you been working with Camden County?

MR. JASPER: Let me say we didn't say that we don't have to work with the townships. I mean our process is not going to require it, but --

MS. CITIZEN: Right.

MR. JASPER: Okay? And courtesy, I understand your concerns. Camden County, I believe we actually started discussions when we first did our site visit, ma'am, with the redevelopment agency sometime maybe in early 2008 time frame.

MS. CITIZEN: Okay. And have you gotten a commitment from the county or this site to improve the roads?

MR. JASPER: I'm sorry?

MS. CITIZEN: Have you received a commitment from the county -- if you choose this site, do you have a

commitment with the county to improve the roads?

MR. JASPER: No, ma'am.

MS. CITIZEN: You do not. So all the years that we've been waiting for this, it hasn't happened; there's no guarantee it's going to happen with your 300 people coming into the area?

MR. JASPER: I can't commit to what the road improvement projects are.

MS. CITIZEN: Okay. Thank you.

(Applause)

MR. JASPER: Sir?

MR. CITIZEN: My name is Tom McGuire [phonetic]. I live at 73 LaCosta Drive. If I'm not mistaken, in your original introductions, Stan was your real estate front man.

MR. CITIZEN: Could someone comment on how you were brought this piece of property?

MR. JASPER: Sure.

MR. CITIZEN: On record?

MR. JASPER: Absolutely.

MR. CITIZEN: Thank you.

MR. @@: Should I speak to the mic?

MR. JASPER: Are you keeping your voice up?

MR. @@: Well, okay. I had a mandate to identify at least --

MS. CITIZEN: Could you use a mic, please?

MS. CITIZEN: Mic.

MR. @@: Okay. The Corps of Engineers in New York District had a mandate to identify at least three sites for consideration in Camden, and --

CITIZENS: Camden County; Camden Township.

MR. @@: -- County. That's what the Corps actually said. In fact, there was something peculiar about that. What did they mean by Camden, because -- look, you guys (inaudible 57:51) city and a township (inaudible 57:54) those get confusing.

In any event, I come down to Camden. The first people I check with to see if there were sites available, publicly-owned sites available was the Pennsauken Bank. And they had nothing for us, nothing that would either meet the size or the location, anything like that. You know, it's understandable because (inaudible 58:19) on any boundary. So it's a pretty good size footprint (inaudible 58:29) -- as the architect mentioned, we can't cut back along side the office (inaudible 58:34) we can't waive that.

So I worked with Pennsauken, and they had nothing for me. Okay, no hard feelings. They recommended I speak with the people in the county, made me some introductions, and I had some meetings with people in

the Camden C.C.I. and Camden County Improvement Authority, and they again really had nothing for me.

They did mention there's an old Nike installation not too far away, and I touched base with that township. It wasn't on the market for us.

(Inaudible 59:06)

MR. @@: Okay. But anyway, when I touched based

with the proposed (inaudible 59:08) they said, no, we want -- we want it for --

MS. CITIZEN: For (inaudible 59:11)

MR. @@: -- same issue. So I ruled that out.

MR. CITIZEN: Why'd you rule that out?

MR. @@: We deal with willing sellers. We -- that's our first priority. We want to do business with somebody who wants to sell to us. We don't want to condemn. We didn't theoretically condemn anything. We do not like to do that. That's the last choice. Okay? So we want to deal with willing sellers. And that said, if the whole deal turned on the primary site (inaudible 59:42) terms of that.

So I then worked with local brokers, people out at Cherry Hill. And one of them is here. The other one is not here. The point is, they found sites for us. They -- and I -- and we went to each and every one of them, walked the site myself. In some cases met the

owners. Of those, the only one at the time that seemed to meet all the criteria would have been the site in Winslow.

But then it was suggested that I touch base with the county (inaudible 60:15) public works. And I did. And they have some plans at that complex (inaudible 60:21) with that complex. I think the 9-1-1 center is there. School buses are parked there. The county (inaudible 60:27) has his offices there. And you know, they had some land that they said we could take a look and talk to us about.

Didn't specify any reason to discuss the layout. When I went there, it didn't seem to fit the bill, but I suggested the Army Reserve come down and have a look, because you're the people that have to live here; not me. So we did. And it turned out we all agree that we like being on public property. That would work out really well for us. But (inaudible 60:51) Camden County D.P.W. complex in (inaudible 60:57).

It certainly didn't have the right layout (inaudible 61:01). They would have had to tear down buildings. The buildings that they would have had to tear down are in fact functional, usable buildings, and so that was ruled out. Now to get to the upshot, on the way back to Fort Dix, we happened to drive by Cross Keys

Road and there was a sign, land for sale, approximately 11.8 acres, and we put it in there. That's how we found this.

That's how we found this. And it turns out that that site, from our perspective, took the criteria we have to meet, was actually better than any of the others. That's why it got --

MR. CITIZEN: With all due respect, sir, you're -- can you go back to the (inaudible 61:39) That was very sketchy.

MR. @@: They didn't want to sell to us.

(Inaudible 61:42)

MR. @@: Whatever jurisdiction. Was it Gloucester? Okay.

(Inaudible 61:46)

MR. @@: Okay. Look, they didn't want to sell it

to us.

MS. CITIZEN: What year was it?

MR. CITIZEN: There might be another contract.

MR. @@: Somewhere -- well --

MR. CITIZEN: Sometimes they could get in a bid.

MR. @@: Summer of 2007. Perhaps later that year.

MS. CITIZEN: There was two of them.

(INAUDIBLE 62:12)

MR. CITIZEN: Actually at the time, the mandate was find willing sellers. Not just speculating -- not just speculating what might happen in the future, but who would be willing to sell to us (inaudible 62:20) in a year now. And that's why it didn't happen. I would have loved to pursue that. It wasn't on the market.

MS. CITIZEN: Well, all of the land that you bought, was it a private seller?

MR. @@: Both the primary and the alternate are privately owned.

MS. CITIZEN: Did any -- where did you get the name (inaudible 62:45)

MR. @@: It might be in my notes. I didn't go down that far.

MS. CITIZEN: Can we maybe drill down (inaudible 62:49) for that? I'd like to know more about that (inaudible 62:52)

MR. CITIZEN: Yes.

MS. CITIZEN: So I'd like names of who you spoke to.

MR. @@: If I have them in my notes, I'll let Kevin know and that can be incorporated in the comments.

MS. CITIZEN: Thank you. What's the sales price of that piece of land you're looking to buy?

MR. @@: This?

MR. JASPER: Do you need to -- can you reveal that?

MR. @@: Sure. Why not?

MS. CITIZEN: Why not? Why not? Public information.

MR. @@: 22 million dollars.

MR. CITIZEN: Well, maybe -- and that's --

MS. CITIZEN: (Inaudible 63:21)

MR. @@: That's consistent -- it's actually a bit more, a tad more than the appraiser wanted, but I (inaudible 63:31 - 63:46)

MR. CITIZEN: Technically I think they're a limited liability corporation. That doesn't really matter. The fact is (inaudible 63:51 - 64:03)

MR. @@: Okay. We have a first option now. We are not obliged to exercise it. Okay? When Camden (inaudible 64:08) it doesn't happen.

MR. JASPER: Okay. We'll move on to another comment.

MR. CITIZEN: Good evening. My name is Chris Consillio. I live in (inaudible 64:25) not too far from this proposal. I see -- I don't know the exact nature of this particular property. I hear a lot of people that are, you know, mad about this whole project. But I can give you real quick site that'll solve your whole

problem right now. If you go look at it, and the ground will be ready to go instantly.

Just go to that place in Lindenwold you guys have been talking about. Used to be an old farmer's market that's closed down. It's the old --

CITIZENS: (Inaudible 65:02)

MR. CITIZEN: It's 33 acres. It's -- it is --

CITIZENS: (INAUDIBLE 65:08)

MR. CITIZEN: -- the whole zone, or that whole strip on Route 30 is almost abandoned. So what you would do for the community, not only would you help that particular community to bring it up, it would most likely -- you would make a lot of people in this community happy. You would make a lot of the politicians happy because you'll take the people off their back, and the ground is already paved so you can go instantly see this site.

You say, wait a second, I don't have to do -- what's your benefit. The only question is, because of the way you've explained to me, I don't know if you have the exact security force that you're -- on this particular property, which I understand exactly what you're saying. But people -- I'm not a born New Jerseyian, okay? But a lot of other people know exactly the specific parcel of land.

And the parcel of land, who already owns this piece? It's owned by the Redevelopment Corporation of

New Jersey. Okay? So it's -- and it's -- if the policy is beneficial to the taxpayer of New Jersey who already purchased this property, and you'll save a lot of money. And that's just my comment. So (inaudible 66:35)

MR. JASPER: Okay, thank you.

(Applause)

MR. JASPER: We -- you're right. We do have two sites, and what I don't want to mess up is to a real estate market where everybody comes forward and announces what they've got. Your particular input --

MR. CITIZEN: Why not? Why not?

MR. JASPER: Right now we are focused on two sites, and until we can't perform on those sites we're going to move off to another one until those two sites don't perform. So if you're interested, once we deny these two sites, then we can consider to open it up to the rest of the county. Okay?

There's a gentleman in the back that's been waiting patiently. I appreciate his input. We are approaching two hours, folks. I'm going to open it up to a couple more comments, and then we'd like to conclude the comments if that's okay with everybody. Sir?

MR. CITIZEN: Good evening. (Inaudible 67:23) Mayo (inaudible 67:24) Gloucester Township. Sir, I was very glad to hear that you are -- you have not made the final decision here, and that you're willing to look at alternative locations, because I have to tell you, I want to talk about the process that's led to this evening, because I think the process has been flawed.

Under the Base Realignment and Closure law that governs this process, it's my understanding that you're required to look at alternative sites. And you have. And you issued a report on -- I believe it was in 2008 according to your environmental report. It's the available site identification validation report, and it did look at twelve sites, three of which were sold prior to you look at it, seven of which were not viable according to your standards, but two of which you're talking about this evening you say are reasonable alternatives.

Also in your report, in Section 4 on Page 69, you write that the capacity of site 2, that the sewer capacity is anticipated to be sufficient to meet demands. We've already heard that there is a sewer moratorium in Winslow Township, but yet your report, which was thorough, did not pick that up.

So I would tell you today that your process in

looking at an alternative location, your alternative location site number 2 is not plausible. I spoke to the Mayor of Winslow today, and she informs me that -- that the first time that anyone from your department spoke to her was Friday, this past Friday about that. So I would say that your willingness to look at all other locations is great, and that you should look at other locations.

Quite frankly, you should do that because you need to comply with the federal law to do that instead of just coming here showing us pictures of our primary site. So the process is flawed. You should look at the

other -- other locations, particularly county-owned property here in Camden County.

Your timetable. You need to complete this by September of 2011, and under your current timetable for this location, you will be done by May of 2011. That gives you four months of cushion there to play with. There's no reason why -- I don't think -- you can start looking today at other locations to perform your environmental impact of other locations, which you said earlier -- I know said, sir -- said would take you six months. But in all honesty, you had letters in your -- in your report that were dated April the 10th that asked for informations pertaining -- of this year pertaining to this report.

So I think you would be able to compile an environmental report rather quickly. So I think that the time frame is doable and you should look at other locations besides this one because the process is flawed.

MR. JASPER: Very good.

(Applause)

MR. JASPER: Briefly let me address a little bit about the Winslow Township sewer. When the A.S.I.D. report he referred to was written, we were not aware of the moratorium. We became aware of the moratorium when issues came up with the primary site. We had done a -- what we call a full-blown environmental -- I'm sorry, an engineering feasibility study to assess the utilities on that site.

Because we were focused on the primary site, we

did an E.F.S., engineering feasibility study to validate the utility capabilities on the primary site. We had not done that for the alternative site. As the issues have arisen, we are currently looking into the Winslow site and the sewer moratorium. We are in discussions with the Camden County Municipal Utility Agency to see if we could potentially address that issue and work that out with them. Obviously no conclusions on that, but before we make a final decision on the Winslow Township

site, we'll have to understand what that moratorium is and how that impacts our site.

If it rules that site out, it rules that site out and we'll have to deal with that in our processes as we go forward. So it is being considered, so -- sir?

MR. CITIZEN: A quick question and a comment. The quick question --

MR. JASPER: And I need you to come to the microphone, please.

MR. CITIZEN: I think I can project well enough here, my command voice. You talk about we have to make a decision. Ultimately where does that final decision, authority reside?

MR. JASPER: Ultimately that is in Washington, D.C. with the Deputy Assistant Secretary of the Army.

MR. CITIZEN: Okay.

MR. JASPER: And we will all take that information up, generalize it up and the decision is made in the Washington line.

MR. CITIZEN: Secondly, you talk about this

ticking clock deadline that you have for your project, but is it not true that federal legislation is passed that grants you an extension, that that timeline could be extended? And if that is the case, I suggest we all get on the horn to Congressman Anderson -- Andrews

tomorrow and get him moving on this.

(Applause)

MR. JASPER: Next comment in the back?

MR. CITIZEN: Mr. Jasper, I attended the meeting on July 30th, and I asked you a question during that meeting. I asked you when did an alternative site, other than the site (inaudible 72:34) have to be introduced into the NEPA process in order for you-all to meet your time deadlines. And I think you said three months prior to that meeting. Is that still your answer right now?

MR. JASPER: I'm going to have to say no. I mean I think that was a generalization statement. Ultimately for additional sites to be considered as we go forward, I mean that requires a six months process for the NEPA. We have time required to do the real estate, and then we'd still have to do the design. So we are -- as far as going to an alternative site, out of the two that are currently under evaluation, our timeline right now is we were far behind schedule. Okay?

MR. CITIZEN: Let me see if I can clarify my question. If we introduce sites C and D today, will that now allow you sufficient time to meet your target deadlines?

MR. JASPER: The only way we as the Corps of

Engineers can go forward with alternative sites is we have to be directed to do that, and until we've gone through this NEPA process, I don't believe we'll be directed to look at additional sites.

MR. CITIZEN: Assuming -- are you -- are you indicating that you need an extension in order to do this, to look at sites C and D?

MR. JASPER: To accomplish the additional sites in the time the legislation requires, we would need some level of extension of the deadline, yes.

MR. CITIZEN: That's what I thought. Okay, thank you.

MR. CITIZEN: He doesn't know what I'm going to talk about. That's why he's smiling. Listen, I'm here to sell a piece of property. Okay? What -- I'm standing here looking at an industrial property that you're doing, trying to put it in a place that's not industrial. This is industrial. Seventy acres (inaudible 74:31) Max to the entrance of 42. You go on and off. No traffic impact.

I don't understand why you're -- and if you don't like mine, that's fine. No problem. But that's ridiculous. That's what I think. Here's the plans for you. (Inaudible 74:54) 100,000 square foot building on that property, all environmental and everything. Okay?

MR. JASPER: All right, sir.

MR. CITIZEN: I'm Joe Brulee. Have a nice day.

MR. JASPER: All right, folks. I'm going to narrow it down to two more comments, and I'd like to take this lady (inaudible 75:15)

MS. CITIZEN: You keep mentioning that the environmental assessment will be revisited? Is that the right terminology that you're talking about?

MR. JASPER: What we'll do is take back the comments that come here, introduce them into that process.

MS. CITIZEN: Are you writing them down?

MR. JASPER: Huh?

MS. CITIZEN: Are you --

MR. JASPER: We actually have them on the recording.

MS. CITIZEN: Oh, good. That was the only thing. My next thing is there was a sign-in sheet or I wasn't aware of the recording. I was going to encourage all of you who are making comments or are sitting here to please contact (inaudible 75:53) which is noted all over this building on the outside so that your voices are heard in writing as well.

MR. CITIZEN: (Inaudible 76:00) full house.

MS. CITIZEN: (Inaudible 76:06) So this ultimate

decision, what is your deadline for this decision to be made? You're going to leave here. You're going to reconvene. You're going to talk about all the stuff we've talked about. You're going to I do believe research and see what you can do to remedy some of this, or all this. And what is your timeline from here?

MR. JASPER: The environmental assessment comment

period closes on August 30th.

MS. CITIZEN: Understood.

MR. JASPER: We would hope that sometime in August that we would reach some type of decision.

(Inaudible 76:34)

MS. CITIZEN: In August?

MR. JASPER: I'm sorry, September. I apologize. No, in September.

MS. CITIZEN: So everything is going to happen in September because you want to start building in October?

MR. JASPER: No, I mean we -- we completed the public comment period. We've got all of our paperwork in place and ready, so we should be in position such that a decision can be made.

MS. CITIZEN: When are you going to make that decision made aware to us, because if you do choose not to use this facility, we definitely want to contact our legislations to give you that extension period because

you're not doing it in (inaudible 77:07)

MR. JASPER: When we know the decisions, we'll make a public announcement with it.

MS. CITIZEN: Are you going to be contacting our township directly?

MR. JASPER: Yes, ma'am.

MS. CITIZEN: Writing, telephone?

MR. JASPER: Yes, ma'am.

(Inaudible 77:19)

MS. CITIZEN: One more question and one comment. You said that the existing facility in Pennsauken does

not now meet the needs based on Oklahoma, the bomb, you needed a certain buffer zone or some words to that effect. You indicated that there is a 148-foot frontage side each on here. That's going to protect people? Because my grandchildren live right here.

And I want to know if 148-feet buffer zone is going to stop a bomb from destroying my family. Is that it, 148 feet?

MR. JASPER: 148 feet is what they consider the setback for -- for example, if someone was to put a car bomb --

MS. CITIZEN: Right.

MR. JASPER: And this happens for all D.O.D. facilities. It's not just here. All our D.O.D.

facilities --

MS. CITIZEN: Well, I don't -- I just -- I care about this one.

MR. JASPER: Yeah, I understand. But what I'm saying is, this building here has to be according to the regulations, they have 148 feet from somebody parking a car that we don't know.

MS. CITIZEN: Right.

MR. JASPER: I mean that we can't control, we can't identify, 148 feet back. That would mitigate the blast effect.

MS. CITIZEN: Mitigate meaning?

MR. JASPER: Meaning -- it's not -- it's not insignificant.

MS. CITIZEN: So my kids -- my grand kids are playing in the back yard, they're still going to be --

probably die?

MR. JASPER: You know, if somebody parked a car bomb right next to your house, I mean -- that could happen.

MS. CITIZEN: (Inaudible 78:48) Okay. My second -- my comment -- that was my question. My comment is -- and maybe it is a question. Why in today's economy when everybody up here is talking about the economy, how their home values are down, why would you pay more than

market to purchase this, of our tax dollars?

MR. CITIZEN: Very good.

MR. JASPER: The purchase price is a negotiated agreement that was based on the market conditions --

MR. @@: Fair market appraisal.

MR. JASPER: Fair market appraisal price. Okay? That he ultimately used to negotiate.

MR. @@: No, the study wasn't the appraisal. The appraisal was an estimate. It's always an estimate.

MR. JASPER: Well, I'll take just one last comment. And I'm going to open that up to Mayor Rau-Hatton.

(Applause)

MAYOR RAU-HATTON: Good evening, and I appreciate that so many residents came out tonight to have your voices heard. Mr. Jasper, I welcome all of you to Gloucester Township, and what I found interesting in this process, and I spoke to Mr. Jasper many times on the -- on the phone, is that the Army has a global view of things. And with all due respect, they were confused

21 whether they were in Camden and didn't realize it was in
22 Camden County.
23 Let me tell you specifically about Gloucester
24 Township, because it matters to us as officials and it
25 matters to our residents. We are 24 and a half square

1 miles. We are almost 68,000 people, and we are a
2 bedroom community, 85 percent residential. People come
3 to this municipality for the schools, the recreation,
4 the fact it's a great place to raise your family, and
5 they have -- and expect and deserve a certain quality of
6 life.
7 For a township to lose a ratable, a commercial
8 ratable is very important to us. In 1998, that entire
9 corridor of Brome Cross Keys Road was rezoned to highly
10 commercial to improve our ratables, to give
11 opportunities for our residents for shopping, for dining
12 and that is all materialized and it's taken years.
13 Eventually that will continue to go down Brome and Cross
14 Keys Road with this property.
15 We -- I asked the Army to have a very open mind
16 about this, and I'm a little frustrated. They keep
17 speaking about your process, and it's a process that's
18 excluded government and then a process that has excluded
19 the residents. In your -- the July 6th letter that I
20 received from the Louis Berger Group, it states SueAnn
21 Metzner, who is the mayor of Winslow, at the same time
22 when the residents received the letter -- it was on July
23 6th, even though the public comment period started
24 earlier -- didn't have any materials.
25 My office put information together and her aide

came and picked it up. We put it in the Gloucester Township Library. She put it in the Winslow Library. The Army put it in Burlington County and Pennsauken Library and Berline Library. That's not indusive to our residents to access that material, and it's really not part of the process.

In your report from the Berger Group, it states that the environmental assessment report identifies documents and evaluates the environmental effects of the limitation of the BRAC Commissioners recommendation on realignment of functions in Camden, New Jersey. So what this report doesn't consider is the zoning of our property. It kind of throws planning right out the door. And I'm on the planning board of the township.

You know, I've sat down in the past with developers and interested parties, and we steered them to appropriate properties. You know, if somebody wants to put in a housing development, I don't say, well, come to the commercial property. You know, you want land uses that are compatible with each other. You're not going to come in from a planning board.

I'm concerned about buffering, which we would normally look at if it was a regular planning board application. There's really no narratives of this. You know, all we have is -- there really wasn't much

information for our residents to have. And that's the frustration that I did receive from the calls in my

office.

I also am concerned that, you know, we do look at the alternate sites. If the meeting that the Army had with officials on July the 30th had happened a year ago or two years ago, instead of going through a development company that doesn't look at zoning, you could come to the township and we could have sat down and said, you know what? We're -- we want you here, and let us show you appropriate properties. And to me those appropriate properties are the tax-exempt properties, which are at Lakeland and maybe the vo-tech school. I think Lakeland would be more ideal because they have more land there, but it's something you really need to explore, because as you can see this is going to dramatically impact our residents.

I'd like to read a letter from Congressman Andrews' office and -- I have to say, the Congressman and his aide have been very helpful, and the Congressman I think would have been here, but had other engagement. This is to Lieutenant General Ben Engler [phonetic].

I would like to begin this letter by thanking the Army Corps of Engineers for selecting Gloucester Township to serve as the host of the new United States

Army Reserves Training Center. Furthermore, I am glad to hear the public comment period was extended for an additional thirty days so that the residents and township officials of Gloucester Township are given the opportunity to express their questions and concerns regarding this Training Center.

Mayor Rau-Hatton and I are excited that a new

training center will be constructed in Gloucester Township. However, we share similar concerns. First, neither my respective office nor myself were informed beforehand of the proposed training center. A greater concern is that the Army Corps of Engineers isn't working with the local community.

Mayor Rau-Hatton has proposed several alternate sites that would be used to accommodate the proposed training center. The current proposed site is strategically located for economic development and would be an invaluable asset to the citizens of Gloucester Township. I urge you to work closely with the Gloucester Township officials so that all options are thoroughly reviewed. A project of this magnitude cannot be rushed. I am confident that a compromise can be reached, and that the training center will become a valuable asset to Gloucester Township.

I ask as Mayor, and I think Council has the same

sentiments, that we want to form a partnership with the Army to have it at the appropriate site so it is something that our community and the Army can be jointly proud of. Thank you.

(Applause)

MR. JASPER: Folks, we obviously have a lot of concerns to work through. We'll take all your comments back, do what we can to work through them, address them through the environmental assessment and go forward from there. So I want to thank everybody for coming out. I hope it's been beneficial to everyone. I know it's been

beneficial to us, so thank you all.

(Applause)

(CONCLUSION)

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