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**ENVIRONMENTAL ASSESSMENT  
FOR BRAC 05 RECOMMENDATIONS FOR  
CLOSURE, DISPOSAL, AND REUSE OF THE DONALD A. ROUSH  
UNITED STATES ARMY RESERVE CENTER  
CLINTON, OKLAHOMA**



**Prepared for:  
U.S. Army Reserve 63D Regional Support Command**

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**August 2012**

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## **DRAFT FINDING OF NO SIGNIFICANT IMPACT**

### **ENVIRONMENTAL ASSESSMENT FOR BRAC 05 RECOMMENDATIONS FOR CLOSURE, DISPOSAL, AND REUSE OF THE DONALD A. ROUSH UNITED STATES ARMY RESERVE CENTER CLINTON, OKLAHOMA**

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the Roush United States Army Reserve Center (USARC) and realignment of essential missions to other installations. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

Pursuant to the Council on Environmental Quality Regulations (CEQ) (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321 et seq.) and 32 CFR 651 (Environmental Analysis of Army Actions), the U.S. Army Corps of Engineers, Mobile District has prepared an Environmental Assessment (EA) for the United States Army Reserve, 63D Regional Support Command (63D RSC) of the potential environmental and socioeconomic effects associated with the closure, disposal, and reuse of the Roush USARC.

This EA analyzes the environmental impacts of the proposed action of closure, disposal, and reuse of the Donald A. Roush United States (U.S.) Army Reserve Center, Clinton, Oklahoma.

### **PROPOSED ACTION**

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

Under BRAC law, the Army was required to close the Roush USARC not later than September 15, 2011. The Roush USARC was closed in May 2006 and the Army will dispose of the Property. As a part of the disposal process, the Army screened the Property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

### **ALTERNATIVES CONSIDERED**

#### **Alternative 1 - No Action Alternative**

The Army secured the Roush USARC after the military mission ended in September 2004 to ensure public safety and the security of remaining government property and allow completion of any required environmental remediation actions. Since the Roush USARC has been vacated for more than 7 years, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the Property, the Army has provided and will continue to provide minimum sufficient maintenance to preserve and protect the site for reuse in an economical manner that

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facilitates redevelopment. Current caretaker activities include quarterly building checks and maintenance, and lawn mowing as needed. If the Roush USARC is not transferred, the Army will continue to provide maintenance levels at the minimum level for surplus government property as specified in 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-1 (Army Facilities Management). The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternatives may be evaluated. The No Action Alternative allows for comparison of impacts between the current caretaker status, and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

### **Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton**

For the Preferred Alternative, the Army would transfer the Roush USARC in “as-is condition” via negotiated sale to the City of Clinton. The facility would provide a location for a range of community services potentially including adult conversational English classes; adult conversational Spanish classes; expanded adult information technology opportunities for senior citizens; a community planning center; centralized shipping and receiving; and family resource center. Renovation is planned for the reuse of the facility and would be undertaken by the City of Clinton. The Administrative and Training Building would be renovated to meet the requirements associated with the reuse of the Property (i.e. offices, storage, adult education classrooms). The Operational Maintenance Shop (OMS) would be renovated to be used as a staging area for equipment and materials. Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and because there was a final reuse plan on which to base the NEPA analysis.

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

The EA, which is incorporated by reference into this Finding of No Significant Impact, examined potential effects of the Preferred Alternative (Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton) and No Action Alternative on 12 resource areas and areas of environmental and socioeconomic concern: aesthetics and visual resources, air quality, biological resources, cultural resources, geology and soils, hazardous materials and toxic substances, land use, noise, socioeconomics (including environmental justice and protection of children), transportation, utilities, and water resources.

The EA performed an analysis of 12 resource categories and areas of environmental and socioeconomic concern including a detailed analysis of three resource categories for each alternative: hazardous and toxic substances (lead-based paint), land use (installation land and current and future development in the region of influence), and socioeconomics (economic development, environmental justice, protection of children, and public services). The analyses in the EA concluded there would be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or No Action Alternative. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted and preparation of an Environmental Impact Statement (EIS) is not required.

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The No Action Alternative would not support Congressional requirements under the BRAC law (Public Law 101-510); consequently, it has not been selected for implementation. Alternative 2 is the preferred alternative of the Army.

## **CONCLUSION**

Based on the Environmental Assessment, it has been determined that implementation of either of the alternatives will have no significant direct, indirect, or cumulative impacts 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.

## **PUBLIC COMMENT**

Interested parties are invited to review and comment on this FNSI within 30 days of publication. Comments and requests for copies of the EA should be addressed to the NEPA Coordinator of the 63D RSC, AFRC-SCA-PWE (Carmen Call), P.O. Box 63, Moffett Field, California 94035-0063, or [carmen.call@usar.army.mil](mailto:carmen.call@usar.army.mil).

The EA is available for review on the Army BRAC website:  
[http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm)

or at the following location:

Clinton Public Library  
721 Frisco  
Clinton, Oklahoma 73601

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FOR THE COMMANDER

Stewart R. Fearon  
COL, EN  
Regional Engineer

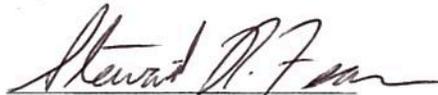
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**ENVIRONMENTAL ASSESSMENT**  
**FOR BRAC 05**  
**CLOSURE, DISPOSAL, AND REUSE OF THE**  
**DONALD A. ROUSH UNITED STATES ARMY RESERVE CENTER**  
**CLINTON, OKLAHOMA**  
**AUGUST 2012**

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## **EXECUTIVE SUMMARY**

### **ES 1 INTRODUCTION**

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the Roush United States Army Reserve Center (USARC) and realignment of essential missions to other installations. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

This Environmental Assessment (EA) analyzes the environmental impacts of the proposed closure, disposal, and reuse of the Donald A. Roush USARC, Clinton, Oklahoma. This EA was developed in accordance with the National Environmental Policy Act (NEPA) [42 United States Code (U.S.C.) § 4321 et seq.]; implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and No Action Alternative.

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

### **ES 2 PROPOSED ACTION**

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

Under BRAC law, the Army was required to close the Roush USARC no later than September 15, 2011. The Roush USARC was vacated in September 2004 and closed in May 2006, and the Army will dispose of the Property. As a part of the disposal process, the Army screened the Property for reuse with the Department of Defense (DoD) and other federal agencies. No federal agency expressed an interest in reusing this Property for another purpose.

### **ES 3 ALTERNATIVES CONSIDERED**

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

The Army secured the Roush USARC after the military mission ended in September 2004 to ensure public safety and the security of remaining government property and allow completion of any required environmental remediation actions. Since the Roush USARC has been vacated for more than 7 years, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the Property, the Army has provided and will continue to provide minimum sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. Current caretaker activities include quarterly building checks and maintenance, and lawn mowing as needed (Hasty 2012). If the Roush USARC is not transferred, the Army will continue to provide maintenance levels at the minimum level for surplus government property as specified in 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-1 (Army Facilities Management). The inclusion of the No Action Alternative is

prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternative may be evaluated. The No Action Alternative allows for comparison of impacts between the current caretaker status and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

### **ES 3.2 Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton**

For the Preferred Alternative, the Army would transfer the Roush USARC in “as-is condition” via negotiated sale to the City of Clinton. The facility would provide a location for a range of community services potentially including adult conversational English classes; adult conversational Spanish classes; expanded adult information technology opportunities for senior citizens; a community planning center; centralized shipping and receiving; and a family resource center. Renovation is planned for the reuse of the facility and would be undertaken by the City of Clinton. The Administrative and Training Building would be renovated to meet the requirements associated with the reuse of the Property (i.e. offices, storage, adult education classes). The Operational Maintenance Shop (OMS) would be renovated to be used as a staging area for equipment and materials (Hewitt 2012). Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and because there was a final reuse plan on which to base the NEPA analysis.

## **ES 4 ENVIRONMENTAL CONSEQUENCES**

Table ES-1 lists each of the environmental resource categories and subcategories and it documents which resources are present and the environmental consequences:

- Not present;
- Present, but not impacted;
- Present, but little or no measurable impacts; or
- Present, but impacts are not significant.

<b>Table ES-1 Summary of Resource Category Impact Analysis for the Roush USARC.</b>		
<b>Resource Category (Alphabetical)</b>	<b>Document Section</b>	<b>Analysis Undertaken</b>
<b>AESTHETICS AND VISUAL RESOURCES</b>	4.1.3	Little or No Measureable Effect
<b>AIR QUALITY</b>	4.1.3	Little or No Measureable Effect
<b>BIOLOGICAL RESOURCES</b>		
<b>Critical Habitat</b>	4.1.1	Not Present
<b>Threatened and Endangered Species (State and Federal)</b>	4.1.1	Not Present
<b>Vegetation</b>	4.1.3	Little or No Measureable Effect
<b>Wildlife</b>	4.1.3	Little or No Measureable Effect
<b>Wilderness Areas and Wildlife Refuges</b>	4.1.1	Not Present
<b>CULTURAL RESOURCES</b>		
<b>Archaeological Resources</b>	4.1.1	Not Present
<b>Historic Buildings</b>	4.1.2	Not Impacted
<b>Historic Properties of Religious or Cultural Significance to Native Americans and Tribes</b>	4.1.1	Not Present
<b>GEOLOGY AND SOIL</b>	4.1.2	Not Impacted
<b>HAZARDOUS AND TOXIC SUBSTANCES</b>		
<b>Adjacent Properties</b>	4.1.2	Not Impacted

**Table ES-1 Summary of Resource Category Impact Analysis for the Roush USARC.**

<b>Resource Category (Alphabetical)</b>	<b>Document Section</b>	<b>Analysis Undertaken</b>
<b>Asbestos Containing Material</b>	4.1.1	Not Present
<b>Lead-Based Paint (LBP)</b> Alternative 1 – No Action Alternative (Caretaker Status) Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton	4.3	No Impacts  No Significant Impacts
<b>Munitions and Explosives of Concern</b>	4.1.1	Not Present
<b>Pits, Sumps, Drywells, and Catch Basins</b>	4.1.3	Little or No Measurable Effect
<b>Polychlorinated Biphenyls (PCBs)</b>	4.1.1	Not Present
<b>Radioactive Materials</b>	4.1.1	Not Present
<b>Radon</b>	4.1.1	Not Present
<b>Regulatory Information</b>	4.1.2	Not Impacted
<b>Storage, Use, Release of Chemicals/Hazardous Substances</b>	4.1.3	Little or No Measurable Effect
<b>UST/ASTs</b>	4.1.1	Not Present
<b>Waste Disposal Sites</b>	4.1.1	Not Present
<b>LAND USE</b>		
<b>Current and Future Development in the Region of Influence</b> Alternative 1 – No Action Alternative (Caretaker Status) Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton	4.4	No significant impacts  No significant impacts
<b>Installation Land/Airspace Use</b> Alternative 1 – No Action Alternative (Caretaker Status) Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton	4.4	No significant impacts  No significant impacts
<b>National and State Parks</b>	4.1.1	Not Present
<b>Prime and Unique Farmland</b>	4.1.1	Not Present
<b>Surrounding Land/Airspace Use</b>	4.1.2	Not Impacted
<b>NOISE</b>	4.1.3	Little or No Measurable Effect
<b>SOCIOECONOMICS</b>		
<b>Economic Development</b> Alternative 1 – No Action Alternative (Caretaker Status) Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton	4.5	No Significant Impacts  No Significant Impacts
<b>Environmental Justice</b> Alternative 1 – No Action Alternative (Caretaker Status) Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton	4.5	No Significant Impacts  No Significant Impacts
<b>Demographics</b>	4.1.2	Not Impacted
<b>Housing</b>	4.1.2	Not Impacted
<b>Protection of Children</b> Alternative 1 – No Action Alternative (Caretaker Status) Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the	4.5	No Significant Impacts  No Significant Impacts

<b>Table ES-1 Summary of Resource Category Impact Analysis for the Roush USARC.</b>		
<b>Resource Category (Alphabetical)</b>	<b>Document Section</b>	<b>Analysis Undertaken</b>
Roush USARC by the City of Clinton		
<b>Public Services</b> Alternative 1 – No Action Alternative (Caretaker Status) Alternative 2 - Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton	4.5	No Significant Impacts  No Significant Impacts
<b>TRANSPORTATION</b>		
<b>Roadways and Traffic</b>	4.1.3	Little or No Measurable Effect
<b>Public Transportation</b>	4.1.1	Not Present
<b>UTILITIES</b>		
<b>Communications</b>	4.1.2	Not Impacted
<b>Energy Sources (Electrical, Gas, etc)</b>	4.1.2	Not Impacted
<b>Potable Water Supply</b>	4.1.2	Not Impacted
<b>Solid Waste</b>	4.1.2	Not Impacted
<b>Storm Water System</b>	4.1.2	Not Impacted
<b>Wastewater System</b>	4.1.2	Not Impacted
<b>WATER RESOURCES</b>		
<b>Floodplains/Coastal Barriers and Zones</b>	4.1.1	Not Present
<b>Hydrology/Groundwater</b>	4.1.2	Not Impacted
<b>National Wild and Scenic Rivers</b>	4.1.1	Not Present
<b>Surface Water (Streams, Ponds, etc.)</b>	4.1.1	Not Present
<b>Wetlands</b>	4.1.1	Not Present

## ES 5 CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the CEQ regulations implementing NEPA (40 CFR 1500), and 32 CFR 651 (Environmental Analysis of Army Actions). As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of the action alternative and the No Action Alternative have been considered.

The EA performed an analysis of 12 resource categories including a detailed analysis of three resource categories for each alternative: hazardous and toxic substances (lead-based paint), land use (installation land and current and future development in the region of influence), and socioeconomics (economic development, environmental justice, protection of children, and public services). The analyses in the EA concluded there would be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or alternatives. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted and preparation of an Environmental Impact Statement (EIS) is not required.

The No Action Alternative would not support Congressional requirements under the BRAC law (Public Law 101-510); consequently, it has not been selected for implementation. Alternative 2 is the preferred alternative of the Army.

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## SECTION 1.0 INTRODUCTION

This Environmental Assessment (EA) analyzes the environmental impacts of the proposed action of closure, disposal, and reuse of the Donald A. Roush United States (U.S.) Army Reserve Center (USARC), Clinton, Oklahoma (Figure 1-1). This EA was developed in accordance with the National Environmental Policy Act (NEPA) [42 United States Code (U.S.C.) § 4321 et seq.]; implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 Code of Federal Regulations (CFR) Parts 1500-1508; and Environmental Analysis of Army Actions, 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and No Action Alternative.

### 1.1 Purpose and Need for the Proposed Action

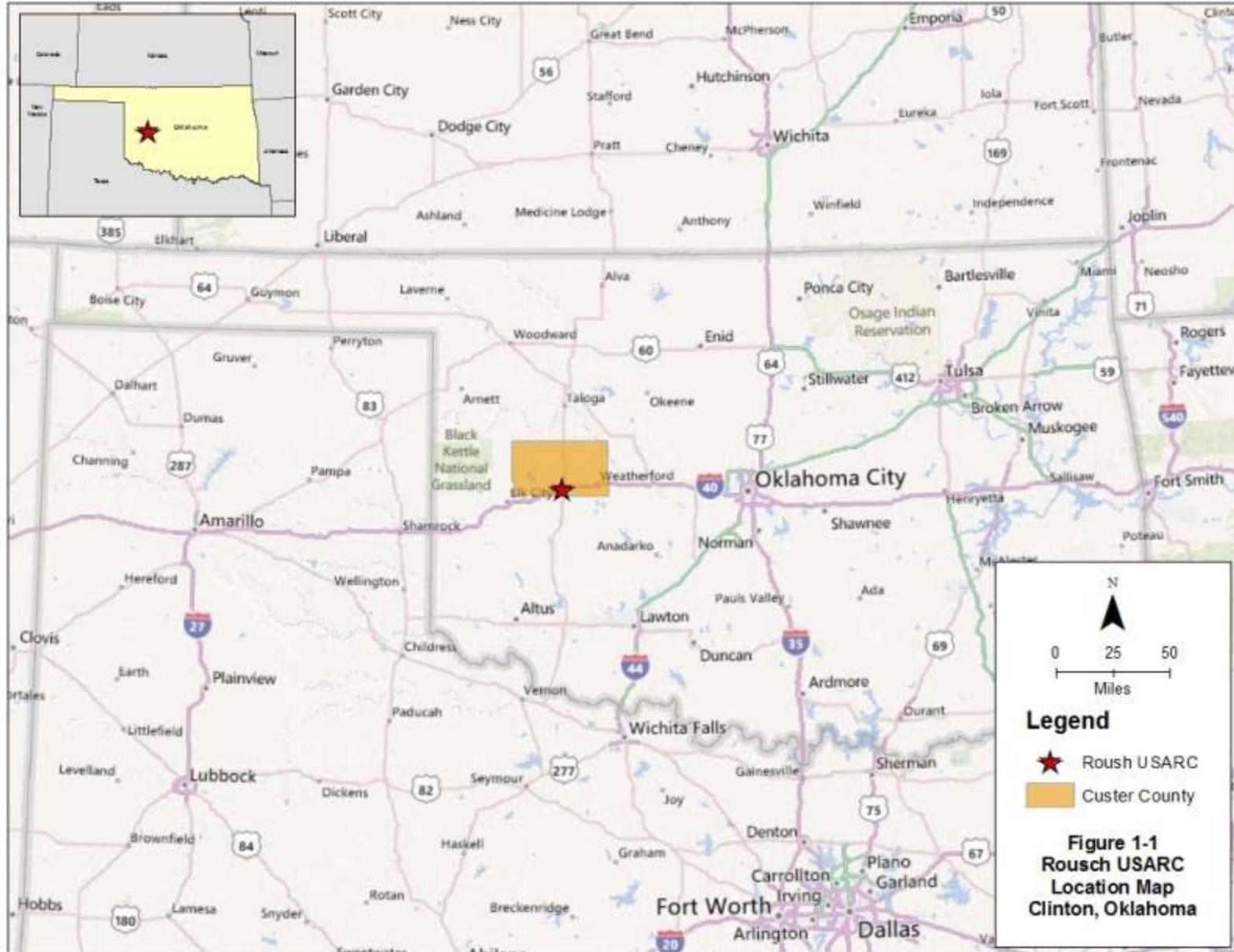
On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the Roush USARC (Figure 1-1) and realignment of essential missions to other installations. The deactivated USARC property is excess to Army need and will be disposed of according to applicable laws and regulations.

### 1.2 Public Involvement

The Army is committed to open decision-making. The collaborative involvement of other agencies, organizations, and individuals in the NEPA process enhances issue identification and problem solving. In preparing this EA, the Army consulted or coordinated with the U.S. Environmental Protection Agency (USEPA), U.S. Department Of Housing And Urban Development (HUD), Oklahoma Department of Environmental Quality (ODEQ), Oklahoma Conservation Commission, Oklahoma Historic Preservation Office (SHPO), City of Clinton Local Redevelopment Authority (LRA), appropriate Native American tribes, U.S. Fish and Wildlife Service (USFWS), and others as appropriate.

The 30-day public review period begins by publishing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in a local newspaper, the *Clinton Daily News*, and a regional newspaper, the *Oklahoman*. The EA and draft FNSI are made available during the public review period at the Clinton Public Library (721 Frisco, Clinton, Oklahoma 73601), and on the BRAC website at [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm). The Army invites the public and all interested and affected parties to review and comment on this EA and the draft FNSI. Comments and requests for information should be submitted to the NEPA Coordinator of the 63D Regional Support Command (63D RSC), AFRC-SCA-PWE (Carmen Call), P.O. Box 63, Moffett Field, CA 94035-0063, or [carmen.call@usar.army.mil](mailto:carmen.call@usar.army.mil).

At the end of the public review period, the Army will review all comments received; compare environmental impacts associated with reasonable alternatives; revise the FNSI or the EA, if necessary; supplement the EA, if needed; and make a decision. If potential impacts are found to be significant, the Army can decide to (1) not proceed with the proposed action, (2) proceed with the proposed action after committing to mitigation reducing the anticipated impact to a less than significant impact in the revised Final FNSI, or (3) publish a Notice of Intent to prepare an Environmental Impact Statement (EIS) in the Federal Register.



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## **SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION**

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

Under BRAC law, the Army was required to close the Roush USARC no later than September 15, 2011. The Roush USARC was vacated in September 2004 and closed in May 2006, and the Army will dispose of the Property. As a part of the disposal process, the Army screened the Property for reuse with the Department of Defense (DoD) and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

### **2.1 BRAC Commission's Recommendation**

The BRAC Commission's recommendation is to:

*“Close the Farr United States Army Reserve Center, Antlers, OK, the **Roush United States Army Reserve Center, Clinton, OK**, the Smalley United States Army Reserve Center, Norman, OK and relocate units into a new Armed Forces Reserve Center and Consolidated Maintenance Facility on the Norman Military Complex, Norman, OK. The new AFRC shall have the capability to accommodate Oklahoma Army National Guard units from the following Oklahoma Army National Guard facilities: Oklahoma Army National Guard Readiness Centers in Tonkawa, OK, Konawa, OK, Wewoka, OK, Oklahoma City (23rd Street), OK, the 23d Street Field Maintenance Shop in Oklahoma City, the Consolidated Maintenance Facility on the Norman Military Complex, Norman, OK and C CO, 700th Support Battalion from the Readiness Center, Edmond, OK if the State of Oklahoma decides to relocate those National Guard units.”*

A separate EA has documented the environmental review of the construction and relocation of the units to a new Armed Forces Reserve Center and Consolidated Maintenance Facility on the Norman Military Complex, in Norman, Oklahoma.

### **2.2 Local Redevelopment Authority's Reuse Plan**

On May 9, 2006, the City of Clinton requested recognition as the Donald A. Roush LRA by the U.S. Office of Economic Adjustment, as the planning entity for the purpose of formulating a recommendation for the reuse of the Roush USARC. On May 22, 2006, the DoD published in the Federal Register recognition of the LRA (City of Clinton). According to the Federal Property Administrative Services Act of 1949 and the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, the City of Clinton screened this Federal government surplus property by soliciting notices of interest (NOIs) from state and local governments, representatives of the homeless, and other interested parties. On June 2, 2006, the City of Clinton published a request for NOIs in the *Clinton Daily News*. The deadline for receiving NOIs was September 18, 2006. The City of Clinton held a public workshop and hosted tours of the Roush USARC facility for the purpose of granting individuals from interested organizations an opportunity to view the Property.

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Prior to the September 18, 2006 deadline, the City of Clinton received NOIs from the following four organizations:

- Mission House, Inc., proposed to gain access to a number of the kitchen items located in the Roush USARC in order to better serve the homeless;
- Local contractor, proposed a gated senior living center;
- Army National Guard, proposed to gain ownership of the Roush USARC for current training activities; and
- Clinton Public Schools, proposed use as an Army Junior Reserve Officer's Training Corps, family resource center, and/or school administrative offices.

Initially, the preferred reuse was for educational purposes; however, the Clinton school district ultimately decided it had no interest in the Property. After reviewing the four reuse proposals, recommendations, and all public comments, the City of Clinton determined the best reuse of the facility would be to house a variety of public services that are not otherwise appropriately sited in the community. It was the City of Clinton's determination that the USARC be acquired by the City of Clinton and used to provide a location for a range of public services potentially including:

- Adult conversational English classes
- Adult conversational Spanish classes
- Expanded adult information technology opportunities for senior citizens
- Community planning center
- Centralized shipping and receiving
- Family resource center

The Redevelopment Plan was made available to the public for review and comment from July 22 through August 4, 2009. The City of Clinton held a public hearing on August 4, 2009 to receive final comments regarding the Redevelopment Plan.

The LRA Redevelopment Plan was submitted to HUD in December 2009. A letter stating approval of the Redevelopment Plan by HUD was received February 18, 2010. As described in the approved LRA Redevelopment Plan, the Army proposes to transfer the Property via negotiated sale to the City of Clinton for reuse (City of Clinton 2010).

## **2.2 Description of the Roush USARC**

In 1958, the U.S. Government purchased approximately 4.75 acres of undeveloped land, located at 1720 Opal Street, Clinton, Custer County, Oklahoma, to construct an Army Reserve Center. Currently, the Property has a military equipment parking (MEP) area, two privately owned vehicle (POV) parking areas, and two permanent structures, including:

- Administrative and Training Building including the drill hall (approximately 9,632 square feet),
- Organizational Maintenance Shop (OMS) (approximately 1,325 square feet),

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Photograph 1. Roush USARC Administrative and Training Building, view to the south.



Photograph 2. Roush USARC drill hall located on the south side of the Administrative and Training Building, view to the northwest.



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Photograph 3. Roush USARC Administrative and Training Building and drill hall, view to the west.



Photograph 4. Roush USARC Organizational Maintenance Shop, view to the south.



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Photograph 5. Roush USARC Organizational Maintenance Shop, view from inside to the west.



Photograph 6. Roush USARC grease rack and supply storage building, view to the east.



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Figure 2-1 shows the Roush USARC site layout. The 9,632 square-foot Administrative and Training Building is concrete block with a brick veneer (Photographs 1, 2, and 3). Construction of this building was completed in 1960, with expansion of the building to the east and addition of the drill hall completed in 1985. The L-shaped Administrative and Training Building consists of a one-level, east-west oriented, administrative and classroom block and a two-story drill hall (Photographs 2 and 3). The building's interior consists of classrooms, restrooms, offices, a drill hall, an arms storage room, a kitchen, and mechanical room. The drill hall has a vehicle roll-up door on the south side that opens onto a driveway. The drill hall was used for troop assemblies and storage.

The OMS building, located approximately 150 feet south of the drill hall is a 1 1/2-story concrete block building (Photographs 4 and 5). There is a single roll-type garage doors on the west side of the building that opens onto the MEP area. The OMS building was used for light vehicle maintenance and storage.

An MEP area, which is connected by a paved road to the west POV parking area, is located west of the OMS. The OMS and MEP are enclosed by a gated chain-link security fence topped with barbed wire. A grease rack ramp and one apparently unused empty storage shed are located north of the OMS, within the fenced area (Photograph 6).

Two hazardous materials (hazmat) storage sheds were within the OMS fenced area during the July 2006 site reconnaissance – the “old” hazmat storage shed and the “new” hazmat storage shed (USACE 2007). Neither shed contained hazmat during the July 2006 reconnaissance. The old shed was previously used to store hazmat to support vehicle maintenance and cleaning activities. The new shed was never used. Both sheds have subsequently been removed from the site.

Impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings cover 1/3 of the Property. The remaining ground surface is covered by lawn. Landscaped shrubs are adjacent to the Administrative and Training Building. There are four deciduous trees (sycamores) that are taller than 40 feet in the area of the Administrative and Training Building. A large lawn area on the south side of the Property is shown on Photograph 4.

The Roush USARC was vacated in September 2004, is currently unoccupied, and has been maintained in caretaker status since September 2004. The 818th Replacement Company was the last unit to occupy the Property. The Roush USARC was historically used by reservists for drill activities on various weekends throughout the year.



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## **SECTION 3.0 ALTERNATIVES**

### **3.1 Alternative 1 – No Action Alternative (Caretaker Status)**

The Army secured the Roush USARC after the military mission ended in September 2004 to ensure public safety and the security of remaining government property and allow completion of any required environmental remediation actions. Since the Roush USARC has been vacated for more than 7 years, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the Property, the Army has provided and will continue to provide minimum sufficient maintenance to preserve and protect the site for reuse in an economical manner that facilitates redevelopment. Current caretaker activities include quarterly building checks and maintenance, and lawn mowing as needed (Hasty 2012). If the Roush USARC is not transferred, the Army will continue to provide maintenance levels at the minimum level for surplus government property as specified in 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-1 (Army Facilities Management). The inclusion of the No Action Alternative is prescribed by the CEQ regulations implementing NEPA and serves as a benchmark against which the environmental impacts of the action alternative may be evaluated. The No Action Alternative allows for comparison of impacts between the current caretaker status and the proposed reuse. Therefore, the No Action Alternative is evaluated in the EA.

### **3.2 Alternative 2 – Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton**

For the Preferred Alternative, the Army would transfer the Roush USARC in “as-is condition” via negotiated sale to the City of Clinton. The facility would provide a location for a range of community services potentially including adult conversational English classes; adult conversational Spanish classes; expanded adult information technology opportunities for senior citizens; a community planning center; centralized shipping and receiving; and family resource center. Renovation is planned for the reuse of the facility and would be undertaken by the City of Clinton. The Administrative and Training Building would be renovated to meet the requirements associated with the reuse of the Property (i.e. offices, storage, adult education classes). The OMS would be renovated to be used as a staging area for equipment and materials (Hewitt 2012). Generalized property reuse intensities were not examined in this EA due to the small size of the USARC property and because there was a final reuse plan on which to base the NEPA analysis.

### **3.3 Alternatives Considered and Eliminated From Further Analysis**

#### **3.3.1 Traditional BRAC No Action Alternative**

The traditional No Action Alternative for a BRAC EA would be for the Roush USARC to remain open and continue to be used by the Army for training activities. However, the Roush USARC was vacated by the Army pre-BRAC 2005 (September 2004). Because the Property has been closed and has not been used by the Army for the last 7+ years, analysis of a traditional BRAC No Action Alternative was eliminated from further analysis.

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### **3.3.2 Early Transfer and Reuse before Cleanup is Completed**

Under this alternative, the Army would take advantage of various property transfer and disposal methods that allow reuse of contaminated property to occur before all remedial actions have been completed. One method is to transfer the Property to a new owner who agrees to perform, or to allow the Army to perform, all remedial actions required under applicable federal and state requirements. The Property must be suitable for the new owner's intended use and the intended use must be consistent with protection of human health and the environment. This alternative was not carried forward for further analysis because the Environmental Condition of Property (ECP) Report Update classified the Property as Type 1, one of seven DoD ECP categories (USACE 2010). A Type 1 classification is an area where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent areas). The vehicle wash rack (VWR) and oil water separator (OWS) were removed from the Property in 1993 and the 2010 ECP Update stated that no documentation or evidence of a release of any kind could be found. The ODEQ concurred with the Army's determination that the Property is uncontaminated. The Roush USARC does not meet the criteria for the early transfer prior to cleanup alternative.

### **3.3.3 Other Disposal Options**

The City of Clinton screened this Federal government surplus property by soliciting NOIs from state and local governments, representatives of the homeless, and other interested parties, as required by the Federal Property Administrative Services Act of 1949, the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, and Redevelopment and Homeless Assistance Act of 1994. As noted above, four organizations responded to the request: Mission House, Inc., a private contractor, Army National Guard, and Clinton Public Schools. The NOIs from these four organizations were not carried forward. The NOI from the Mission House, Inc. indicated they were not interested in occupying the Property but had a need for some of the kitchen equipment at the Roush USARC. The NOI from the Clinton School District was initially the preferred reuse; however, the school district ultimately decided it had no interest in the Property. After considering other reuse possibilities, the City of Clinton determined that the community's most pressing need was for a multi-purpose facility. Because no other NOIs were selected by the City of Clinton, those proposed reuses were not carried forward for analysis in this EA (City of Clinton 2011).

## SECTION 4.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

This section describes the existing environment and analyzes the significance of direct, indirect, and cumulative effects of the proposed action and alternatives on the environment. The affected environment is the baseline to understand the potential effects of the alternatives under consideration (40 CFR 1502.15). As noted in Section 3, the baseline consists of the Army caretaker activities at the Roush USARC and existing environment present from the time of operational closure until conveyance of the Property. This chapter also describes the potential impacts of the Proposed Action and the No Action Alternative. An impact is defined as a consequence from modification to the existing environment due to a proposed action or alternative.

Twelve resource areas, including aesthetics and visual resources, air quality, biological resources, cultural resources, geology and soils, hazardous and toxic substances, land use, noise, socioeconomics, transportation, utilities, and water resources, were considered for potential impacts from the Proposed Action and the No Action Alternative. Some resources were eliminated from detailed analysis as described below. Table 4-1 lists each of the environmental resource categories and subcategories, it documents which resources are present and the environmental consequences, and it references the document section containing each discussion.

<b>Resource Category (Alphabetical)</b>	<b>Document Section</b>	<b>Analysis Undertaken</b>
AESTHETICS AND VISUAL RESOURCES	4.1.3	Resource Present, Little or No Measureable Effect
AIR QUALITY	4.3	Resource Present, Little or No Measureable Effect
<b>BIOLOGICAL RESOURCES</b>		
Critical Habitat	4.1.1	Resource Not Present
Threatened and Endangered Species (State and Federal)	4.1.1	Resource Not Present
Vegetation	4.1.3	Resource Present, Little or No Measureable Effect
Wildlife	4.1.3	Resource Present, Little or No Measureable Effect
Wilderness Areas and Wildlife Refuges	4.1.1	Resource Not Present
<b>CULTURAL RESOURCES</b>		
Archaeological Resources	4.1.1	Resource Not Present
Historic Buildings	4.1.2	Resource Present, Not Impacted
Historic Properties of Religious or Cultural Significance to Native Americans and Tribes	4.1.1	Resource Not Present
<b>GEOLOGY AND SOIL</b>	4.1.2	Resource Present, Not Impacted
<b>HAZARDOUS AND TOXIC SUBSTANCES</b>		
Adjacent Properties	4.1.2	Resource Present, Not Impacted
Asbestos Containing Material	4.1.1	Resource Not Present
Lead-Based Paint (LBP)	4.3	Detailed Analysis of Resource

<b>Table 4-1. Summary of Resource Category Impact Analysis for the Roush USARC.</b>		
<b>Resource Category (Alphabetical)</b>	<b>Document Section</b>	<b>Analysis Undertaken</b>
Munitions and Explosives of Concern	4.1.1	Resource Not Present
Pits, Sumps, Drywells, and Catch Basins	4.1.3	Resource Present; Little or No Measurable Effect
Polychlorinated Biphenyls (PCBs)	4.1.1	Resource Not Present
Radioactive Materials	4.1.1	Resource Not Present
Radon	4.1.1	Resource Not Present
Regulatory Information	4.1.2	Resource Present, Not Impacted
Storage, Use, Release of Chemicals/Hazardous Substances	4.1.3	Resource Present; Little or No Measurable Effect
UST/ASTs	4.1.1	Resource Not Present
Waste Disposal Sites	4.1.1	Resource Not Present
<b>LAND USE</b>		
Current and Future Development in the Region of Influence	4.4	Detailed Analysis of Resource
Installation Land/Airspace Use	4.4	Detailed Analysis of Resource
National and State Parks	4.1.1	Resource Not Present
Prime and Unique Farmland	4.1.1	Resource Not Present
Surrounding Land/Airspace Use	4.1.2	Resource Present; Not Impacted
<b>NOISE</b>	4.1.3	Resource Present; Little or No Measurable Effect
<b>SOCIOECONOMICS</b>		
Economic Development	4.5	Detailed Analysis of Resource
Environmental Justice	4.5	Detailed Analysis of Resource
Demographics	4.1.2	Resource Present, Not Impacted
Housing	4.1.2	Resource Present, Not Impacted
Protection of Children	4.5	Detailed Analysis of Resource
Public Services	4.5	Detailed Analysis of Resource
<b>TRANSPORTATION</b>		
Roadways and Traffic	4.1.3	Resource Present; Little or No Measurable Effect
Public Transportation	4.1.1	Resource Not Present
<b>UTILITIES</b>		
Communications	4.1.2	Resource Present, Not Impacted
Energy Sources (Electrical, Gas, etc)	4.1.2	Resource Present, Not Impacted
Potable Water Supply	4.1.2	Resource Present, Not Impacted
Solid Waste	4.1.2	Resource Present, Not Impacted
Storm Water System	4.1.2	Resource Present, Not Impacted
Wastewater System	4.1.2	Resource Present, Not Impacted

**Table 4-1. Summary of Resource Category Impact Analysis for the Roush USARC.**

<b>Resource Category (Alphabetical)</b>	<b>Document Section</b>	<b>Analysis Undertaken</b>
WATER RESOURCES		
Floodplains/Coastal Barriers and Zones	4.1.1	Resource Not Present
Hydrology/Groundwater	4.1.2	Resource Present, Not Impacted
National Wild and Scenic Rivers	4.1.1	Resource Not Present
Surface Water (Streams, Ponds, etc.)	4.1.1	Resource Not Present
Wetlands	4.1.1	Resource Not Present

#### **4.1 Environmental Resources Eliminated from Further Consideration**

Army NEPA Regulations (32 CFR § 651.14) state the NEPA analysis should reduce or eliminate discussion of minor issues to help focus analysis. This approach minimizes unnecessary analysis and discussion during the NEPA process. CEQ Regulations for implementing NEPA (40 CFR § 1500.4(g)) emphasizes the use of the scoping process, not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the environmental assessment process.

Resource categories with more than one component (e.g., Hazardous and Toxic Substances), may have certain subcategories that can be deemphasized due to insignificance and other subcategories that should be analyzed in more detail. These resource categories will, therefore, be discussed in multiple subsections throughout Section 4.

##### **4.1.1 Environmental Resource Categories That Are Not Present**

None of the alternatives would have direct, indirect, or cumulative impacts on certain subcategories of the resource categories, because these subcategories do not exist on or near the Property:

- **Critical Habitat** - The Property is in an urban setting, is highly disturbed, lacks natural habitat and the USFWS has not designated critical habitat on or in the vicinity of the Property (Appendix A).
- **Threatened and Endangered Species (State and Federal)** - Coordination was conducted with the US Fish and Wildlife Service and the Oklahoma Conservation Commission (Appendix A). No species protected under Federal or state laws are known to exist on the Property.
- **Wilderness Areas and Wildlife Refuges** - The nearest national wilderness area is the Wichita Mountains Wilderness, which is located 60 miles from the Property. The nearest national wildlife refuge is the Washita National Wildlife Refuge which is located approximately 25 miles from the Property. These resources would not be affected by the proposed actions.

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- **Archeological Resources** – According to the 1998 Cultural Resources Assessment of the 90<sup>th</sup> RSC, the Roush USARC has “low” archeological potential. The Oklahoma SHPO has concurred that no part of the Roush USARC is recommended for survey. SHPO coordination is presented in Appendix A.
  - **Historic Properties of Religious or Cultural Significance to Native Americans and Tribes** - No Native American resources within the boundaries of the Roush USARC have been identified through consultation. Native American coordination is presented in Appendix A.
  - **Asbestos Containing Material** - The alternatives would have no direct, indirect, or cumulative impact on asbestos containing material on the Property. As part of a 1997 building inspection, eight samples were collected for asbestos analysis (90<sup>th</sup> RSC 1997). A sample of non-friable floor tile mastic in the west classroom tested positive for asbestos and two flexible duct connectors found in the OMS were assumed to be asbestos. According to the U.S. Army Reserve, asbestos containing material within the USARC was removed between 1998 and 2000. U.S. Army Reserve personnel were not able to locate specific documentation or reports describing the work and/or when it was performed (USACE 2007). During the 2012 site visit, it appeared that the floor tiles had been replaced.
  - **Munitions and Explosives of Concern** - No evidence was found during the ECP site reconnaissance or records review process of the past presence of munitions and explosives of concern. An arms storage room is located in the Administrative and Training Building. According to the ECP, no live ammunition was ever stored on the Property and there were no other firing range activities that may have resulted in lead contamination of the Property (USACE 2007).
  - **Polychlorinated Biphenyls (PCBs)** - The alternatives would have no direct, indirect, or cumulative impact on PCBs on the Property. A PCB assessment was performed in 1997 on the nearby offsite electric transformers that feed the Roush USARC and the fluorescent lighting fixtures on the Property. Based on the assessment and contact with American Electric Power Company-Public Service Company of Oklahoma, the transformers were determined to be non-PCB containing. The fluorescent lighting fixtures were also identified as non-PCB units (USACHPPM 1997).
  - **Radioactive Materials** – There was no indication that radioactive materials were present at the Roush USARC based on the site evaluation for this document and the ECP. A radiological clearance survey was completed in June 2009. Results were below the removable release limits in the Army Radiation Safety Program (DA PAM 385-24). Additionally, the Historical Site Assessment revealed no radiological incidents have occurred at the Property (TACOM-RI 2009).
  - **Radon** – The alternatives would have no direct, indirect, or cumulative impact on radon. In 1993, radon tests were performed at six locations in the Administrative and Training Building at the Roush USARC. All results were 1.0 pCi/L or less (DA 1993). The Property is in the USEPA Radon Zone 3, which has “Low Potential” for radon. The USEPA-recommended action level is 4.0 pCi/L. Therefore, based on actual measurements and the general location of the Property, radon is not an environmental concern.

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- **UST/ASTs** - Based on a review of available records, a search of federal and state environmental databases, and interviews with U.S. Army Reserve personnel, no bulk petroleum aboveground storage tanks (ASTs) and/or underground storage tanks (USTs) were previously located at the Roush USARC (USACE 2007).
  - **Waste Disposal Sites** - The alternatives would have no direct, indirect, or cumulative impact on waste disposal sites. The Roush USARC is listed as a RCRA-conditionally exempt small-quantity generator (CESQG). A RCRA CESQG is defined as a facility generating less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. The Roush USARC generates small quantities of hazardous waste, such as used florescent light bulbs, as part of caretaker activities. No RCRA violations were identified for the Roush USARC (USACE 2007). Disposal activities are in accordance with federal, state, local, and DoD requirements.
  - **National and State Parks** - The property does not contain and is not near any national or state parks. The nearest national park is the Washita Battlefield National Historic Site, located approximately 60 miles from the Property. The nearest state park is Foss State Park, located approximately 20 miles from the Property. These resources would not be affected by the proposed actions.
  - **Prime and Unique Farmlands** - The Roush USARC is not prime or unique farmland as defined by 7 CFR 658.2(a), because the definition of farmland does not include land already in or committed to urban development.
  - **Public Transportation** - The alternatives would have no significant direct, indirect, or cumulative impact on public transportation because there is no public transportation system (bus or train) within the City of Clinton. Public transportation only provides service to/from other cities such as Oklahoma City via Greyhound bus or Amtrak train. No further analysis is required.
  - **Floodplains/Coastal Barriers and Zones** – The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the City of Clinton, Oklahoma (Community-Panel Number 400054 0005 D, Map revised April 3, 1987), lists the Roush USARC in Zone C. FEMA defines Zone C as “areas of minimal flooding.” The Property is outside the 100-year and 500-year flood zones. There is no coastal zone management plan for Oklahoma (USACE 2007).
  - **National Wild and Scenic Rivers** – There are no designated wild and scenic river within the State of Oklahoma.
  - **Surface Water (Streams, Ponds, etc.)** - The site reconnaissance revealed that no streams, ponds, or other surface water bodies are present on the Roush USARC or adjacent areas. The Washita River, located approximately 1.5 miles east of the Property, is the nearest major surface water feature.
  - **Wetlands** - A site reconnaissance was conducted by a qualified wetland biologist. No evidence of wetlands was observed on the Property including wetland vegetation, hydric soils, or wetland hydrology.

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#### 4.1.2 Environmental Resources that are Present, but Not Impacted

The alternatives would have no significant direct, indirect, or cumulative impacts on certain subcategories of the environmental categories, because no renovation activities are planned that would alter or affect these resources:

- **Historic Buildings** – The approximately 9,632 square feet Administrative and Training Building and the approximately 1,325 square feet OMS were constructed more than 50 years ago. The Oklahoma SHPO concluded by letter dated June 1, 2011 that these structures are not eligible for the National Register of Historic Places (Appendix A).
- **Geology and Soil** - The alternatives would have little or no direct, indirect, or cumulative impact on the geology or soil on the Property. These resources are present on or underneath the Property, but would not be impacted by the proposed action because the renovation activities that are planned would not occur deep enough to affect these resources. Geological hazards such as sinkholes, caves, mines, or quarries do not exist on or adjacent to the property. Seismic risk is relatively small.
- **Adjacent Properties** - Adjacent properties include residential houses and Clinton High School. None of the properties adjacent to the Roush USARC possesses any known environmental issue.
- **Regulatory Information (Hazardous and Toxic Substances)** – Potential environmental sites of concern located within recommended minimum search distances from the Roush USARC were evaluated. None of the properties evaluated are considered “High Risk.” “High Risk” properties are those that exhibit environmental conditions that have the probability of adversely affecting the environmental conditions at the Property. Land use at the adjacent properties does not appear to have changed significantly since the Roush USARC was built and does not appear to have impacted the environmental conditions of the USARC (ECP 2007).
- **Surrounding Land/Airspace Use** - The alternatives would have no direct, indirect, or cumulative impact because the activities included in the proposed action are compatible with the existing surrounding land uses and air space use. Land use north, west, and east of the Roush USARC consists of a residential neighborhoods. The property directly south and southwest of the USARC is the City of Clinton High School.
- **Demographics** - People work and reside in the socioeconomic Region of Influence (ROI). The alternatives would have no direct, indirect, or cumulative impact on the demographic make-up of the ROI because the proposed action would not alter the size, gender, race, or age of the population in the ROI.
- **Housing** - The alternatives would have no direct, indirect, or cumulative impact on the surrounding housing resources because the proposed actions would not affect housing prices or create any displacements.
- **Utilities** - The alternatives would have no direct, indirect, or cumulative impact on utilities, because the utilities have the capacity to provide service for either of the alternatives and any changes in demand and usage would be minor. The utilities include communications, electric service (AEP-PSCO), natural gas (Oklahoma Natural Gas Company), potable water supply (City of Clinton), solid waste disposal (City of Clinton

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to Custer County Landfill), storm water system, and wastewater system (City of Clinton) (City of Clinton 2012).

- **Hydrology/Groundwater** - These resources are present on or underneath the USARC property, but would not be impacted by the proposed action because the renovation activities that are planned would not occur deep enough to affect these resources.

#### **4.1.3 Resources are Present, but Little to No Measurable Environmental Effect**

The resources listed and discussed below are present at the Roush USARC and negligible impacts may occur to these resources as a result of implementing the proposed action. Because these impacts would have little to no measurable environmental effect on the resource, the impacts will not be discussed in detail.

- **Air Quality** - None of the alternatives would have a significant direct, indirect, or cumulative impact on air quality in the region because there will not be a measurable change in air emissions by the renovation of the Roush USARC Administrative and Training Building. The status of the air quality in a given area is determined by the concentrations of various pollutants in the atmosphere. The Federal Clean Air Act (CAA) (42 USC 7401-7671q) required the USEPA to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality pollutant levels throughout the United States. The General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), requires any federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the General Conformity Rule's requirements and complete a Record of Non-applicability (RONA) or positively determine that the action conforms to the provisions and objectives of the applicable State Implementation Plan (SIP). The proposed action for the Roush USARC will occur within Custer County, Oklahoma, which is designated as "in attainment" for all USEPA NAAQS criteria pollutants; therefore, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. The Oklahoma State Implementation Plan was reviewed and the project actions would be in accordance with all regulations within or referenced by the plan (EPA 2012). All applicable construction and operation permits would be obtained as required by ODEQ Air Pollution Control OAC 252:100. Permits would be obtained before the project begins. No further analysis and no further documentation are required.
- **Aesthetics and Visual Resources** - The alternatives would have little or no direct, indirect, or cumulative impact on the aesthetics and visual resources present at the Roush USARC because the existing building footprints would not substantially change. Renovations to existing buildings and landscaping would have negligible impacts and do not require further analysis.
- **Vegetation** - The alternatives would have little or no direct, indirect, or cumulative impact on the vegetation present at the Roush USARC because the Property is developed and urbanized. Over 1/3 of the Property is covered by impervious features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is mowed grass, with small shrubs close to the Administrative and Training Building and four large (>40 foot) sycamore trees scattered around the Administrative and Training

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Building. Although renovation activities may remove, replace, or add to the existing vegetation, there would be little to no measurable environmental effect.

- **Wildlife** - The alternatives would have little or no direct, indirect, or cumulative impact on wildlife present at the Roush USARC. Existing wildlife consists of few species found in typical urban environments such as songbirds, small mammals, and invertebrates. Renovation activities would be temporary and there would be minimal, if any, displacement of individuals utilizing the area for habitat.
- **Pits, Sumps, Drywells, and Catch Basins** - The alternatives would have little or no direct, indirect, or cumulative impact on pits, sumps, drywells, and catch basins. The Roush USARC is served by a sanitary sewer system from the City of Clinton. All wastewater generated within the buildings discharges to the sanitary sewer system. Administrative and Training Building floor drains are located within the kitchen, mechanical room, and restrooms. There is a grease trap outside the kitchen; however, the kitchen has not been used since the 1980s. Storm water drains off the Property to storm drains on Opal Street to the north and Jaycee Lane to the south. One onsite OWS was excavated and disposed of offsite in 1993. There are no indications of a release to the environment. A wash rack was also excavated and closed (USACE 2007).
- **Storage, Use, Release of Chemicals/Hazardous Substances** - The alternatives would have little or no direct, indirect, or cumulative impact on storage, use, or release of chemicals/hazardous substances. Past uses made it necessary to store and use paint, antifreeze, and petroleum, oil, and lubricants (POL). The Roush USARC functioned as an administrative, maintenance, and training facility between 1958 and 2004. The U.S. Army Reserve units stationed at the Property did not have many government vehicles, and vehicle maintenance and repair work was primarily performed at an Area Maintenance Support Activity shop located at one of the other USARC in Oklahoma. A VWR with an OWS that discharges to the sanitary sewer was shown on a figure in a previous architectural report (Parsons 1998). The OWS was not required to be registered with the state of Oklahoma when it was operational. During the July 2006 site reconnaissance, the area was covered with grass and there were no visible signs of the VWR or OWS. According to the 2007 ECP Report, the VWR and OWS were reportedly removed by a contractor in 1993 (USACE 2007). The 2010 ECP Report Update subsequently found that no documentation or evidence of a release of any kind could be found (USACE 2012). Chemicals formerly used and stored at the Property were associated with limited vehicle maintenance, facility maintenance activities, and janitorial services. Hazardous substances were stored in a hazmat shed in the OMS fenced area. However, there is no evidence that Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances were stored at the Property for 1 year or more in excess of their corresponding reportable quantity. The ECP Update Report (2010) classified the Property as Type 1, an area where no release, or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent areas) (USACE 2010). The ODEQ concurred with the Army's determination that the Property is uncontaminated.
- **Noise** - The alternatives would have little or no direct, indirect, or cumulative impact on noise levels. Noise levels would have no effect on safety or health. The major source of

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noise is from occasional vehicles and lawn mowing. Under the No Action Alternative these noise sources would remain unchanged. Under the Preferred Alternative the noise sources would be short-term renovation activities, privately owned vehicles, service vehicles, and heating, ventilation, and air conditioning (HVAC). The noise levels associated with the proposed action is equal to or slightly higher than the No Action (Caretaker) Alternative, which is the current use, and would be compatible with surrounding noise levels. The Army classifies areas with noise levels from these sources as Zone 1, compatible with all land uses, including residential. The nearest sensitive noise receptors are the Clinton High School and residential development adjacent to the Property. The noise levels associated with each of the alternatives would be compatible with the high school's noise levels. No further analysis is required.

- **Roadways and Traffic** - The alternatives would have little or no direct, indirect, or cumulative impact on roadways and traffic because the roadways and signage present are adequate to provide service. The preferred action would result higher traffic volume, and the types of vehicles used at the Property would differ under each alternative, but the overall impact to transportation would be minimal. No further analysis is required.

## **4.2 Environmental Resources Analyzed in Detail**

Three resource areas, including hazardous and toxic substances, land use, and socioeconomics were identified for detailed analysis. The focus of detailed analysis is on those environmental resource areas that have the potential to be adversely impacted, could require new or revised permits, or have the potential for public concern.

### **4.2.1 Hazardous and Toxic Substances**

#### **4.2.1.1 Affected Environment**

##### **4.2.1.1.1 Lead-Based Paint**

A LBP survey of the Roush USARC was completed in 1994. The report stated that the date of construction for the USARC buildings was 1960, an addition occurred in 1961, and a new roof was added in 1992 (ETC Engineers, Inc. 1994). The report stated that LBP was detected at nine locations in the USARC, including door jambs, a pipe bollard, an edge guard, a grease rack, and walls. During the July 2006 visual reconnaissance, the painted surfaces in both buildings appeared to be in good condition (USACE 2007). During the January 2012 site visit, the painted surfaces in both buildings were peeling or chipping in multiple places.

##### **4.2.1.2 Consequences**

Potential impacts to hazardous and toxic substances are considered significant if the Proposed Action would:

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

After performing an analysis of hazardous and toxic substances, it was determined that no significant impacts would occur under either alternative. Detailed analysis of each alternative is described in the subsections below.

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#### **4.2.1.2.1 Alternative 1 – No Action Alternative (Caretaker Status)**

**Direct Impacts.** No direct impacts are anticipated under this alternative. The Army would continue maintenance activities necessary to protect the property and buildings from deterioration. Any remaining small quantities of hazardous and toxic substances would have been disposed of in accordance with federal, state, local, and DoD requirements after closure of the Roush USARC.

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

#### **4.2.1.2.2 Alternative 2 – Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton**

**Direct Impacts.** Minor long-term beneficial direct impacts would occur through the reuse of the Roush USARC property. Under this alternative, the Property would be transferred to the City of Clinton as is. No remedial activities would be performed by the Army prior to the transfer of the property (*e.g.*, lead abatement). Renovation activities that would involve the removal of LBP materials would be managed by the City of Clinton. Disposal activities would be in accordance with federal, state, local, and DoD requirements. Long-term beneficial impacts are anticipated with the proper removal of these materials from the Property.

LBP would not present an unacceptable risk to human health and the environment or present a disproportionate health and safety risk to children, because the City of Clinton would be responsible for complying with all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards. Prior to permitting the use of the Property, the City of Clinton specifically agrees to perform, at its sole expense, any lead abatement requirements.

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

### **4.2.2 Land Use**

#### **4.2.2.1 Affected Environment**

The Roush USARC is a 4.75-acre parcel that sits in a developed area in the southwest part of Clinton. It is bordered by residential areas to the west, north, and east, and the Clinton High School campus to the south. The Roush USARC is located in a zoned R-1, Single Family Residential District.

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

Clinton High School is completing construction of a new sports facility, band room, and will be working towards constructing a fine arts center. These development projects sit directly south of the Roush USARC. The City of Clinton will be constructing a new fire station and water park in the next few years. Additionally, there has been a recent increase in development of businesses (hotels and restaurants) along Highway 40 due to growth of the oil and gas industry (Hewitt 2012).

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#### 4.2.2.1.2 Installation Land Use

The Roush USARC was vacated in 2004 and is now under Army caretaker status. The Property is unoccupied except during quarterly building maintenance checks and lawn mowing. The 818th Replacement Company was the last unit to occupy the Property. The Roush USARC was historically used by reservists for drill activities on various weekends throughout the year.

Parking uses include two parking lots for use by the military personnel and an MEP. The Roush USARC includes two buildings or structures. One storage shed is also located on the Property. The Administrative and Training Building is currently unoccupied. The OMS building is unused.

#### 4.2.2.2 Consequences

Potential impacts to land use are considered significant if the proposed action would:

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

After performing an analysis of land use, it was determined that no significant impacts would occur under either alternative. Detailed analysis of each alternative is described in the subsections below.

##### 4.2.2.2.1 Alternative 1 – No Action Alternative (Caretaker Status)

**Direct Impacts.** The Roush USARC property would continue to contain parking areas, permanent structures, and maintained lawns under this alternative. Minor adverse direct impacts to the community would result from the continued existence of a vacant facility in the neighborhood, including a potential decline in property values.

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

##### 4.2.2.2.2 Alternative 2 – Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton

**Direct Impacts.** There would be minor long-term beneficial impacts to land use under this alternative. The reuse of this site would be more beneficial than leaving the property in caretaker status. The proposed action would result in beneficial use of the land for the local residents in Clinton. The land use would change from vacant to community actions that affect the local area.

The parcel to be used by the City of Clinton would not require a change of zoning since it is located in a zoned Residential District. The permitted uses within this zoning include single-family dwellings, churches, library, public park, and public school or school offering general educational services (Williams 2012).

Residential districts are located adjacent to the Property. Therefore, the proposed developments would be similar to and would not conflict with the adjacent land uses.

**Indirect Impacts.** No indirect impacts on land use are anticipated as there would be no changes to land use on adjacent properties as a result of this action.

### 4.2.3 Socioeconomics

#### 4.2.3.1 Affected Environment

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

- Local and regional economic activity,
- Demographics,
- Housing,
- Public services,
- Environmental justice in minority and low-income populations, and
- Protection of children from environmental health risks and safety risks.

The Roush USARC is located in Custer County, Oklahoma , and the county is the ROI for this socioeconomic analysis.

#### 4.2.3.1.1 Economic Development

##### Local Economic Activity

Current personnel at the Roush USARC include one site manager who visits the Property quarterly. Expenditures by the site manager are spent in the local economy.

##### Regional Economic Activity

The Oklahoma economy lagged behind the nation in falling into the recession. Oklahoma is an energy producing state, so until energy prices declined dramatically, Oklahoma was not greatly affected (OSU 2012).

Oklahoma and Custer County had small gains in their labor forces from 2005 to 2010. Although they did experience an increase in unemployment between 2005 and 2010, their unemployment did not increase as much as many other regions and the nation, which continued to climb in 2010 and reached nearly 10 percent (Table 4-2).

<b>Jurisdiction</b>	<b>2010 Labor Force (persons)</b>	<b>2010 Unemployment Rate (%)</b>	<b>2005 Labor Force (persons)</b>	<b>2005 Unemployment Rate (%)</b>
Custer County, Oklahoma	15,123	5.0	13,479	3.2
Oklahoma	1,754,690	7.1	1,705,506	4.5
United States	153,889,000	9.6	149,320,000	5.1

*Source: US Department of Labor, Bureau of Labor Statistics 2010 (BLS 2010)*

Except for the Financial Activities, Government, and Professional and Business Services sectors, Custer County experienced a decline in employment for all other industrial sectors (Table 4-3).

<b>Industry</b>	<b>2009 Annual Average (persons)</b>	<b>2008 Annual Average (persons)</b>	<b>2009-2010 Percent Change</b>
Natural Resources and Mining and Construction	(D)	(D)	(D)
Manufacturing	1,113	1,160	(4.1)
Trade, Transportation and Utilities	3,153	3,192	(1.2)
Information	127	132	(3.8)
Financial Activities	1,149	1,102	4.3
Professional and Business Services	590	588	0.3
Education and Health Services	(D)	1,471	(D)
Leisure and Hospitality	(D)	(D)	(D)
Other Services	1,007	1,013	(0.5)
Government	3,023	2,929	3.2
Total	17,407	17,066	2.0

*Source: U.S. Department of Commerce, Bureau of Economic Analysis 2011*  
(D) Not shown to avoid disclosure of confidential information, but the estimates are included in the totals.  
( ) Indicates a Decrease

#### **4.2.3.1.2 Public Services**

##### **Education**

Custer County has five school districts in addition to private schools. Custer County has six elementary schools, five middle schools, and four high schools. The Clinton School District serves 2,131 students with one high school, two middle schools, and two elementary schools (Public Schools K12 2010).

##### **Health**

Residents in Custer County have access to a variety of hospitals and medical centers. There are two hospitals (Long Island Hospitals 2011). Integris Clinton Regional Hospital is in Clinton. Southwestern Memorial Hospital is in Weatherford, located approximately 15 miles to the east of the Roush USARC.

##### **Law Enforcement**

Law enforcement within the ROI is provided by county and municipal police departments. The Custer County Sheriff's Office is located in Arapaho. The City of Clinton Police Department is located 1.5 miles southwest of the Roush USARC (City of Clinton 2012b).

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## Fire Protection

Fire protection and emergency medical services are provided by municipal fire departments throughout the ROI. The City of Clinton has a mostly volunteer fire department. The Clinton Fire Department provides fire protection and rescue services as well as fire prevention and education programs to citizens in a 100 square mile coverage area. The Clinton Fire Department Chief's Office is located approximately 1.5 miles to the southwest of the Roush USARC (City of Clinton 2012b).

## Recreation

The City of Clinton owns and maintains 17 parks in the community. ACME Brick Park features a miniature train ride, children's playground, three indoor racquetball courts, practice goals for basketball, baseball batting cages, indoor walking track, cardio training room, strength training room, men's and women's locker and shower facilities, private aerobics instruction, 1-mile nature trail/walking track, two ponds for fishing, and a 68-acre irrigated and lighted playing fields area with three baseball, three softball and 16 soccer fields (City of Clinton 2012b).

### 4.2.3.1.3 Environmental Justice

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

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

Tables 4-4 and 4-5 summarize minority and low income population for the area. The Roush ROI has approximately 16.9 percent of individuals at or below the poverty level, a percentage which is much lower than the nation but is similar to the state of Oklahoma (American Community Survey 2010). The ROI percent minority is smaller than the state and the nation although the percent that are Hispanic/Latino is higher in the ROI than in the state.

<b>Jurisdiction</b>	<b>Total Population</b>	<b>Median Household Income</b>	<b>All People Whose Income is Below Poverty Level (%)</b>
Custer County, Oklahoma	26,824	\$42,108	16.9
Oklahoma	3,675,339	\$42,979	16.2
United States	303,865,272	\$51,914	13.8

*Source: US Department of Commerce, US Census Bureau – American Community Survey 5-year Estimates 2010*

**Table 4-5 Minority and Low-Income Populations: Roush USARC Region and Larger Regions, 2010.**

Jurisdiction	Percent Minority	Percent Black or African American	Percent American Indian/ Alaska Native	Percent Asian	Percent Native Hawaiian or Other Pacific	Percent Some Other Race	Two or More Races	Percent Ethnicity Hispanic/ Latino
Custer County, Oklahoma (ROI)	17.9	3.3	5.5	1.1	0.1	4.4	3.5	13.1
Oklahoma	26.0	7.3	7.1	1.7	0.1	2.7	8.6	8.2
United States	26.0	12.5	0.8	4.7	0.2	5.5	2.4	16.3

Source: US Department of Commerce, US Census Bureau – American Community Survey 1-year Estimates, 2010.

#### 4.2.3.1.4 Protection of Children

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

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

Within 1 mile of the Roush USARC, there are two elementary schools and two daycare centers.

#### 4.2.3.2 Consequences

Potential socioeconomic impacts are considered significant if the proposed action would cause:

- Substantial gains or losses in population and/or employment; or
- Disequilibrium in the housing market, such as severe housing shortages or surpluses, resulting in substantial property value changes.

Potential environmental justice impacts are considered significant if the proposed action would cause disproportionate effects on low-income and/or minority populations. Potential impacts of environmental health and safety risks to protection of children are considered significant if the proposed action would cause disproportionate effects on children.

After performing an analysis of socioeconomics, it was determined that no significant impacts would occur under either alternative. Detailed analysis of each alternative is described in the subsections below.

##### 4.2.3.2.1 Alternative 1 – No Action Alternative (Caretaker Status)

**Direct Impacts.** No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Roush USARC property would not be transferred from caretaker status and would be maintained, no direct impacts to these resources are anticipated.

**Indirect Impacts.** No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Roush USARC property would not be transferred from caretaker status and would be maintained, no direct impacts to these resources are anticipated.

**4.2.3.2.2 Alternative 2 – Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton**

**Direct Impacts.** Under Alternative 2, short-term beneficial direct economic impacts would be realized by the regional and local economy during the renovation and construction phase of the proposed reuse. Employment generated by renovation and construction activities would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies.

The Economic Impact Forecast System (EIFS) model, developed by the U. S. Army Corps of Engineers Construction Engineering Research Laboratory, was used to assess the impacts of this alternative on the economy. The estimated cost of materials and supplies for the renovation under Alternative 2 is approximately \$250,000 (2011 dollars). The estimated renovation period for the new facilities is 2 years. The EIFS employment and income multiplier for the ROI is 2.51.

Table 4-6 provides the estimated direct, indirect, and total annual economic impacts of renovation activities on business volume, income, and employment, as estimated by the EIFS model. These impacts would be realized over the length of the construction period. The increase in business volume, income, and employment includes capital expenditures, income, and labor directly associated with the renovation activity. Table 4-6 also provides the indirect impacts on business volume, income, and employment because of the initial direct impacts of the renovation activities. Note that local construction workers are expected to be utilized and non-local workers would not relocate. Appendix C contains a description of the EIFS model and the EIFS reports on impacts.

<b>Table 4-6 Estimated Annual Economic Impacts: Alternative 2.</b>				
<b>Variable</b>	<b>Direct Impacts</b>	<b>Indirect Impacts</b>	<b>Total</b>	<b>RTV<sup>1</sup></b>
<b>Annual Construction Impacts<sup>2</sup></b>				
Sales (Business) Volume	\$147,548	\$222,798	\$370,346	0.03
Income	\$99,313	\$69,213	\$168,526	0.01
Employment	3	2	5	0.02
<sup>1</sup> Rational Threshold Value.				
<sup>2</sup> 2011 Dollars.				
<i>Source: Economic Impact Forecast System, US Army Corps of Engineers, Construction Engineering Research Laboratory.</i>				

The EIFS model also includes a Rational Threshold Value (RTV) profile used in conjunction with the forecast models to assess the degree of the impacts of an activity for a specific geographic area. Appendix C contains a description of the RTV. Table 4-7 provides the RTV associated with each of the economic impacts resulting from the renovation activity. If the RTV for a variable is less than the historic maximum annual deviation for that variable, then the

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regional economic impacts are not considered significant. The regional positive RTVs for each economic variable are as follows: sales volume (11.44%) income (7.77%); employment (8.46%); and population (5.16%). Thus, the RTV for each of the variables was found to be considerably less than the respective regional RTV. For this reason, impacts associated with the construction would not result in substantial annual beneficial impacts.

There would be negligible short-term beneficial benefits to the economy and labor market through additional employment opportunities during the renovation phase of the project. There would be temporary construction jobs. There are no impacts to the education services sector because it is anticipated that the staff needed for the reuse would be utilized from the existing City of Clinton school system.

There are no anticipated impacts to public services (i.e. police and fire protection, hospital services). Staff and students that would use the site are already located in the community, so there would be no additional demand on resources. There would be long-term impacts to educational services from the reuse of the building as an educational facility. It would provide families, youth, and seniors, the opportunity for Adult Conversational English and Spanish classes, information technology opportunities for senior citizens, job training, community planning, and a family resource center.

There are no anticipated impacts to low-income or minority populations. The ROI has a poverty rate and minority population similar to the surrounding areas. It is not anticipated that the impacts would be any greater to minority individuals or individuals below the poverty line than non-minority populations and those above the poverty line.

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

**Indirect Impacts.** Employment generated by renovation activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4-7. The indirect economic impacts of the proposed renovation activities on business volume, income, and employment are also provided in Table 4-7. As a result of renovation expenditures for materials, supplies, and services, in addition to renovation labor wages, the EIFS model estimates an approximately \$222,000 increase in indirect business volume; a \$69,000 increase in indirect or induced personal income; and an increase of 2 indirect jobs created in the construction, retail trade, service, and industrial sectors. These impacts would be realized on an annual basis during the length of the construction period, and would have short-term, negligible impacts on the regional economy.

#### 4.4 Cumulative Effects

The cumulative impact analysis evaluates the incremental effects of implementing either of the alternatives when added to past, present, and reasonably foreseeable future USARC actions at the Roush USARC and the actions of other parties in the surrounding area. The cumulative impact analysis has been prepared at a level of detail that is reasonable and appropriate to support an informed decision by the 63D RSC in selecting a preferred alternative. The cumulative impact discussion is presented according to each of the alternatives.

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The key components of the cumulative impact analysis include the following categories.

**Cumulative Impact Analysis Area.** The cumulative impact analysis area includes the area that has the potential to be affected by implementation of the proposed action at the Roush USARC. This includes the installation and the area proximate to the installation boundary and varies by resource category being considered. Analysis areas are defined in Section 4.7.2 for each resource category analyzed in detail.

**Past and Present Actions.** Past and present actions, other than the proposed action, are defined as actions within the cumulative analysis area under consideration that occurred before or during January 2012 (the environmental baseline for this EA). These include past and present actions at the Property and past and present demographic, land use, and development trends in the surrounding area. In most cases, the characteristics and results of these past and present actions are described in the Affected Environment sections under each of the resource categories covered in this EA.

The Property is located in a mixed-use area that combines commercial, public service, and residential land uses. Early in the century, the Property had open fields and was part of a privately owned farm. The Property has served as a USARC since the U.S. government acquired the land in 1958, and has primarily functioned as an administrative and educational facility, with limited maintenance of military vehicles. The Roush USARC was historically used by reservists for drill activities on various weekends throughout the year. The Roush USARC was closed in 2004 and remains inactive. The last U.S. Army Reserve unit based at the Roush USARC was the 818th Replacement Company. Other units historically based at the Roush USARC prior to the 818th Replacement Company included the 313th Training Brigade Unit, a Drill Sergeant Unit, and U.S. Army Reserve Postal Service Unit (USACE 2007). Units from the Roush USARC have been relocated to a new Armed Forces Reserve Center and Consolidated Maintenance Facility on the Norman Military Complex, Norman, Oklahoma.

Seven new Armed Forces Reserve Centers have been built in Norman, Mustang, McAlester, Broken Arrow, Lawton, Enid, and Muskogee.

Residential developments to the west and north of the Roush USARC existed in the 1940s based on the 1940 aerial photograph. Land to the south and east was mainly railroads and farm land. The 1955 aerial photographs indicate additional development in the adjacent properties to the north and west. The 1966 aerial photograph shows full residential development to the north, west, and east. The 1995 aerial photograph shows more development to the south and east of the Property (USACE 2007).

With abundant oil, natural gas reserves, and wind power, Oklahoma City is home to the headquarters of Fortune 500 energy companies and some of the largest energy companies in the state. The City of Clinton is 85 miles west of Oklahoma City and is benefiting from this economic growth. Major recent development projects in the area immediately surrounding the Roush USARC include a new sports facility and band room at Clinton High School and construction of new hotel and restaurant chains to the south of the Roush USARC, along Interstate 40 (City of Clinton 2012).

**Reasonably Foreseeable Future Actions.** Reasonably foreseeable future actions are mainly limited to those that have been approved and that can be identified and defined with respect to timeframe and location. Reasonably foreseeable future actions that have been identified and

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considered in the analysis of cumulative impacts, both on the USARC property and off the USARC property, are described below.

Military operations in Oklahoma will continue in order to provide Oklahoma and the United States with ready and deployable forces for missions at home and abroad. This would include military training activities at Fort Sill, in Lawton, at Tinker Air Force Base in Oklahoma City, McAlester Army Ammunition Plant in McAlester, at Altus Air Force Base in Altus, and at Vance Air Force Base in Enid. Military training at Oklahoma Air National Guard and Oklahoma Army National Guard facilities will also continue in the area.

According to the City of Clinton, current or planned development projects in the vicinity of the Roush USARC include a new fine arts center at Clinton High School. In other parts of Clinton there is expected to be continued redevelopment and revitalization of businesses in the south section of Clinton along Interstate 40. Planning has begun for a new city fire station and new city water park (City of Clinton 2012).

#### **4.4.1 Potential Cumulative Impacts**

##### **4.4.1.1 No Impacts to Resources**

As documented in Section 4.1 of this EA, there are several resource categories that that will not be discussed in the cumulative impacts section. Army NEPA regulations (32 CFR § 651.14) state the NEPA analysis should reduce or eliminate discussion of minor issues to help focus analysis. Several resource categories are not discussed here because they are:

- Not present;
- Present, but not impacted; or
- Present, but would have little or no measurable impacts.

The resource categories that are not discussed in detail include:

- Aesthetics and Visual Resources;
- Biological Resources;
- Cultural Resources;
- Geology and Soil;
- Noise;
- Transportation;
- Utilities; and
- Water Resources.

##### **4.4.1.2 Alternative 1 – No Action Alternative (Caretaker Status)**

Under Alternative 1, it is anticipated that past and present development trends on the USARC and in the surrounding civilian community would continue. The Roush USARC Property would not be transferred from caretaker status and would be maintained. Therefore, no additional reasonably foreseeable future actions are anticipated. There would be no cumulative impacts under Alternative 1.

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#### 4.4.1.3 Alternative 2 – Preferred Alternative: Traditional Army Disposal and Reuse of the Roush USARC by the City of Clinton

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

- **Hazardous and Toxic Substances.** The cumulative impact analysis area for hazardous and toxic substances includes the Roush USARC property and immediate vicinity. Renovation associated with the proposed action and other reasonably foreseeable future actions would be consistent with the current urban setting; consequently no changes to the affected environment are anticipated and no cumulative impacts would be expected to occur.
- **Land Use.** The cumulative impact analysis area for land use includes a ½ mile radius around the Roush USARC property. Negligible cumulative impacts associated with this project in combination with other past, present, and reasonably foreseeable future projects would include potential land use changes such as new housing, retail, and recreational facilities. These land use changes are compatible with surrounding land use.
- **Socioeconomics.** The cumulative impact analysis area for socioeconomics includes Custer County, Oklahoma. Employment generated by the reuse of the Roush USARC property would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies. These beneficial impacts combined with the employment and economic opportunities of the future development that is expected throughout the region according to the City of Clinton would have minor short-term and long-term impacts to the local and regional community.

#### 4.5 Best Management Practices

As discussed in Sections 4.1 through 4.6 above, no significant adverse or significant beneficial impacts have been identified or are anticipated as a result of implementing any of the Proposed Action alternatives or the No Action Alternative.

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

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## **SECTION 5.0 FINDINGS AND CONCLUSIONS**

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

The No Action Alternative would not support Congressional requirements under the BRAC law (Public Law 101-510); consequently, it has not been selected for implementation.

Alternative 2 is the preferred alternative of the Army and the LRA. This alternative would include the transfer the property via negotiated sale to the City of Clinton for the purpose of community programs and administrative use as recommended by the City of Clinton LRA in the Roush USARC Reuse Plan (City of Clinton 2010).

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## SECTION 6.0 LIST OF PREPARERS

This EA was prepared under the direction of the 63D RSC and U.S. Army Corps of Engineers. Individuals who assisted in issue resolution and provided agency guidance for this document are:

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Contractor personnel involved in the development of this EA include the following:

Name	Education and Experience	Primary Responsibilities
Susan Bupp	B.A. Anthropology, M.A. Anthropology. 33 years of experience in environmental assessment and impact studies, Section 106 coordination, and cultural resources investigations.	Cultural Resources Specialist; responsible for preparation of cultural resources affected environment and consequences.
Virginia Flynn	B.S. Horticulture, M.S. Plant Biology. Over 14 years of experience in environmental assessment and impact studies, biological community investigations, and ecosystem restoration.	Senior Environmental Scientist, data collection, analysis, and preparation of EA text and supporting sections
Richard Hall	B.S. Environmental Biology, M.S. Zoology. Over 24 years of experience in environmental assessment and impact studies, biological community investigations, and ecosystem restoration.	Project Manager/Senior Project Planner; data collection and key participant in description of proposed action, alternatives formulation, and related environmental analyses.
Michael Kulik	B.S. Environmental Biology, M.S. Environmental Science, Masters of Public Affairs, LEED AP BD+C. Over 5 years experience in environmental compliance and hazardous materials assessment and remediation.	Senior Environmental Scientist, data collection, analysis, and key participant in preparation of EA text and supporting sections.
Rachael E. Mangum	B.A. Anthropology, M.A., Anthropology. 13 years experience in Section 106 coordination and cultural resources investigations	Cultural Resources Specialist. Responsible for preparation of cultural resources affected environment and consequences.
Darren Mitchell	B.S. Biology, M.S. Biology. Over 6 years experience in working on environmental compliance, wildlife management, wetland delineations, and NEPA planning.	Senior Environmental Scientist, task manager and key participant in site visit, data collection, analysis, and preparation of EA text and supporting sections.
Amanda Molsberry	B.A. Geography, M.S. Environmental Science and Policy. Over 5 years experience in conservation design, environmental planning, and socioeconomic analysis.	Environmental Scientist, data collection, analysis, and key participant in preparation of EA text and supporting sections.

<b>Name</b>	<b>Education and Experience</b>	<b>Primary Responsibilities</b>
Randy Norris	B.S. Plant and Soil Science, Master of Urban Planning/Environmental Planning. 19 years experience in environmental impact assessment, environmental management, and planning.	Project Scientist; key participant in description of proposed action, alternatives formulation, and environmental impact analyses.
Rebecca Porath	B.S. Fisheries and Wildlife Management, M.S. Zoology. Over 12 years experience in environmental, biological, and natural resource planning projects.	Senior Environmental Scientist, data collection, analysis, and key participant in preparation of EA text and supporting sections.

## SECTION 7.0 DISTRIBUTION LIST

Persons and Organizations contacted as part of the initial coordination effort:

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<p>Steve A Hewitt  City Manager  City of Clinton  P.O. Box 1177  Clinton, OK 73601</p>	<p>Ms. Beth Ledbetter  Oklahoma Department of Environmental Quality  P.O. Box 165  Burns Flat, Oklahoma 73624-0165</p>
<p>Linda R. Charest, BRAC Coordinator  Office of Special Needs Assistance Programs  Dept. of Housing and Urban Development  451 7<sup>th</sup> Street, SW., Room #7266  Washington, DC 20410</p>	<p>Oklahoma Conservation Commission  Custer County Conservation District  1508 Neptune Dr., Ste 1  Clinton, OK 73601-9731</p>
<p>Timothy Baugh, Section 106 Coordinator  Oklahoma State Historic Preservation Office  Oklahoma Historical Society  Oklahoma History Center  800 Nazih Zuhdi Drive  Oklahoma City, OK 73105</p>	<p>Janice Boswell Governor  Cheyenne and Arapaho Tribes  P.O. Box 38  Concho, OK 73022</p>
<p>Louis Maynahonah, Chairman  Apache Tribe of Oklahoma  P.O. Box 1330  Anadarko, OK 73005</p>	<p>Ronald Twohatchet, Chairman  Kiowa Indian Tribe of Oklahoma  P.O. Box 369  Carnegie, OK 73015</p>
<p>Leslie Standing, President  Wichita and Affiliated Tribes  P.O. Box 729  Anadarko, OK 73005</p>	<p>Jimmy W. Arterberry  Historic Preservation Officer  Comanche Nation Historic Preservation Office  #6 SW 'D' Avenue, Suite A  Lawton, Oklahoma 73507</p>

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## SECTION 8.0 REFERENCES

References used during the development of this EA include the following:

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## **SECTION 9.0 PERSONS CONSULTED**

All information was solicited and collected from USARC personnel and members of the LRA (City of Clinton) in preparation of this document.

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## SECTION 10.0 ACRONYMS

### A

AST Aboveground Storage Tank

### B

BRAC Base Realignment and Closure

### C

CEQ Council on Environmental Quality

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CESQG Conditionally Exempt Small-Quantity Generator

CFR Code of Federal Regulations

### D

DoD Department of Defense

### E

EA Environmental Assessment

ECP Environmental Condition of Property

EIFS Economic Impact Forecast System

EIS Environmental Impact Statement

EO Executive Order

### F

FEMA Federal Emergency Management Agency

FNSI Finding of No Significant Impact

### G

### H

HVAC Heating, Ventilation, and Air Conditioning

HUD U.S. Department of Housing and Urban Development

### I

### J

### K

### L

LBP Lead-Based Paint

LRA Local Redevelopment Authority

### M

MEP Military Equipment Parking

MSA Metropolitan Statistical Area

### N

NAAQS National Ambient Air Quality Standards

NEPA National Environmental Policy Act

NOI Notice of Intent

### O

ODEQ Oklahoma Department of Environmental Quality

OMB Office of Management and Budget

OMS Organizational Maintenance Shop

OWS Oil-Water Separator

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<b>P</b>		US	United States
PCB	Polychlorinated biphenyls	USACE	United States Army Corps of Engineers
POL	Petroleum, Oils, and Lubricants	USARC	United States Army Reserve Center
POV	Privately Owned Vehicle	USC	United States Code
<b>Q</b>		USEPA	United States Environmental Protection Agency
<b>R</b>		USFWS	United States Fish and Wildlife Service
RCRA	Resource Conservation and Recovery Act	UST	Underground Storage Tank
ROI	Region of Influence	<b>V</b>	
RSC	Regional Support Command	VOC	Volatile Organic Compounds
RTV	Rational Threshold Values	VWR	Vehicle Wash Rack
<b>S</b>		<b>W</b>	
SIP	State Implementation Plan	<b>X</b>	
SHPO	State Historic Preservation Officer	<b>Y</b>	
<b>T</b>		<b>Z</b>	
TPY	Tons per Year		
<b>U</b>			

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## APPENDIX A – AGENCY COORDINATION

<b>A.1 Initial Coordination Letters</b> .....	A-3
<b>A.2 SHPO – Section 106 Consultation</b> .....	A-15
<b>A.3 USFWS Consultation</b> .....	A-31
<b>A.4 Agency and Public Notices</b> .....	A-41

### Public and Agency Comments

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

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

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

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## **A.1 Initial Coordination Letters**

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

<b><u>Agency</u></b>	<b><u>Date</u></b>
Letter to US EPA, Region 6	5 March 2012
Letter to US Fish and Wildlife Service, Oklahoma Ecological Services Field Office	5 March 2012
Letter to City Manager, City of Clinton	5 March 2012
Letter to Oklahoma Department of Environmental Quality	19 March 2012
- Response from Oklahoma Department of Environmental Quality	23 March 2012
Letter to Department of Housing and Urban Development	5 March 2012
Letter to Oklahoma Conservation Commission	5 March 2012



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Ms. Rhonda Smith, NEPA Coordinator  
US EPA  
Region 6  
1445 Ross Ave.  
12th Floor, Suite 1200  
Dallas, TX 75202-2733

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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

The purpose and need of the closure, disposal, and reuse of the Roush USARC is to meet the requirements of the Base Closure and Realignment Act. The Roush USARC is located at 1720 Opal Street, Clinton, Custer County, Oklahoma. The site is 4.75 acres in size and contains two permanent buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Two alternatives are being considered for the proposed action and both would occur at the current location of the Roush USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since the Reserve mission at the Roush USARC ended in September 2004, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the property, the Army has provided and will continue to provide minimum sufficient maintenance to

preserve and protect the site for reuse in an economical manner that facilitates redevelopment. Current caretaker activities include quarterly building checks and maintenance, and lawn mowing as needed. The No Action Alternative allows comparison of impacts between the current caretaker status and the proposed reuse.

The Army's Preferred Alternative (Alternative 2) involves the disposal and reuse of the Roush USARC. The Army would transfer, via negotiated sale, the 4.75 acres to the City of Clinton. The facility would provide a location for a range of community services potentially including adult conversational English classes; adult conversational Spanish classes; expanded adult information technology opportunities for senior citizens; a community planning center; centralized shipping and receiving; and a family resource center.

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

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

Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Ms. Carmen Call, 63D RSC, Attn: ARRC-SCA-PWE, P.O. Box 63, Moffett Field, California 94035 or by email at [carmen.call@usar.army.mil](mailto:carmen.call@usar.army.mil). If you have any questions, please contact me at 650-279-1823 or at the above referenced email address.

We look forward to working cooperatively with you to make this important project successful for all parties involved.

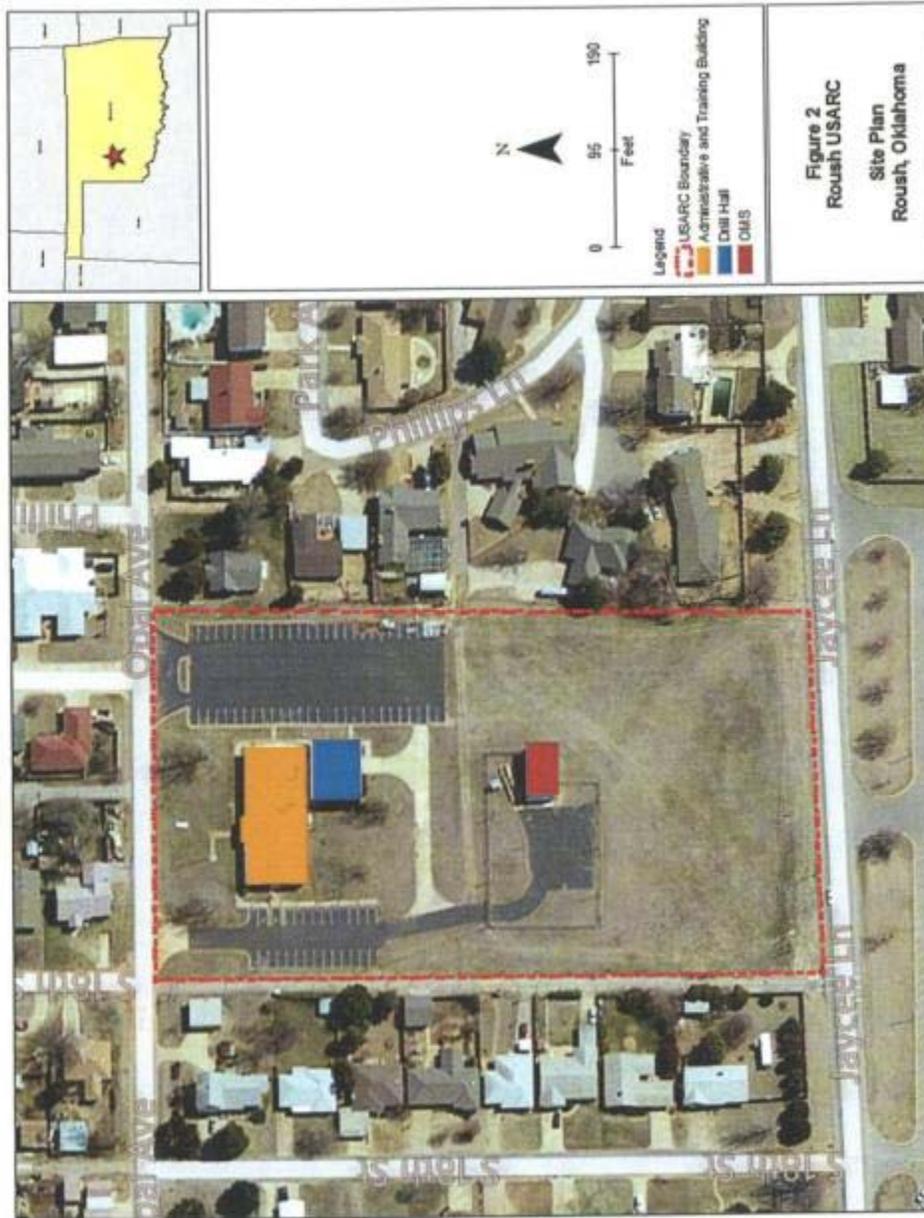
Sincerely,



Ms. Carmen Call  
Environmental Protection Specialist  
63D Regional Support Command, DPW

Enclosures  
Figure 1: Location Map  
Figure 2: Current Site Plan







DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Mr. Luke Bell  
US Fish and Wildlife Service  
Oklahoma Ecological Services Field Office  
9014 East 21st Street  
Tulsa, OK 74129

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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

The purpose and need of the closure, disposal, and reuse of the Roush USARC is to meet the requirements of the Base Closure and Realignment Act. The Roush USARC is located at 1720 Opal Street, Clinton, Custer County, Oklahoma. The site is 4.75 acres in size and contains two permanent buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Two alternatives are being considered for the proposed action and both would occur at the current location of the Roush USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since the Reserve mission at the Roush USARC ended in September 2004, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the property, the Army has provided and will continue to provide minimum sufficient maintenance to



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HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Mr. Steve Hewitt, City Manager  
City of Clinton  
P.O. Box 1177  
Clinton, OK 73601

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

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DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

19 March 2012

Ms. Beth Ledbetter  
Oklahoma Department of Environmental Quality  
P.O. Box 165  
Burns Flat, Oklahoma 73624-0165

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Ledbetter:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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From: Ledbetter, Beth [mailto:Beth.Ledbetter@deq.ok.gov]  
Sent: Friday, March 23, 2012 11:40 AM  
To: Call, Carmen Miss USAR 63RD RSC ARIM  
Subject: Roush USARC-Clinton OK

I am not aware of any issues at this facility.

Classification: UNCLASSIFIED

Caveats: NONE



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Ms. Linda Charest, BRAC Coordinator  
Office of Special Needs Assistance Programs  
Department of Housing and Urban Development  
451 7th Street, SW  
Room #7266  
Washington, DC 20410

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Oklahoma Conservation Commission  
Custer County Conservation District  
1508 Neptune Drive  
Ste 1  
Clinton, OK 73601-9731

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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## **A.2 SHPO – Section 106 Consultation**

Appendix A.2 contains the following correspondence associated with the preparation of the Environmental Assessment and coordination with the SHPO and Native American tribes.

<b><u>Agency/Tribe</u></b>	<b><u>Date</u></b>
Letter Oklahoma State Historic Preservation Office	4 April 2011
- Response from SHPO for Architectural Survey	1 June 2011
- Response from SHPO on Archeology	14 July 1998
Letter to Apache Tribe of Oklahoma	5 March 2012
Letter to Kiowa Indian Tribe of Oklahoma	5 March 2012
Letter to Wichita and Affiliated Tribes	5 March 2012
Letter to Comanche Nation	22 March 2012
Letter to Cheyenne and Arapaho Tribes	5 March 2012



**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, UNITED STATES ARMY 63RD REGIONAL SUPPORT COMMAND  
P.O. Box 63  
MOFFETT FIELD, CALIFORNIA 94035-1000

April 4, 2011

Reply to the Attention of the Environmental Office

Dr. Bob L. Blackburn, SHPO  
State Historic Preservation Office  
Oklahoma Historical Society  
Oklahoma History Center  
800 Nazih Zuhdi Drive  
Oklahoma City, OK 73105-7917

Dear Dr. Blackburn:

In accordance with 36 CFR Part 800 and Army Regulation 200-1, the 63rd Regional Support Command (RSC) is requesting written comments and concurrence from the State Historic Preservation Office (SHPO) on the action described herein. Under the 2005 Base Realignment and Closure (BRAC) legislation, the 63rd RSC must transfer out of Federal ownership several Department of the Army properties. The 63d RSC completed architectural surveys of several buildings at multiple facilities and made the determination of eligibility for listing on the National Register of Historic Places (NRHP) for each.

The George C. Farr USAR Center is located at 709 Sw C Street (Po Box 601), Antlers, Oklahoma. The leased property will be returned to the City of Antlers, as the Lessor, they have not provided the 63d RSC with their reuse plans for this property. Routinely, leased properties are made available for public uses. The facility is on 4.03 acres of land with two permanent structures: a 4,320-square-foot Training Building and a 2,210-square-foot organizational maintenance shop (OMS). Approximately one-quarter of the site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by a maintained lawn area with a few scattered trees. The facility is located on well-drained Bemow fine sandy loam and moderately well drained Hamden fine sandy loam (Bain and Watterson, Jr. 1979). The slope is between 1 and 2%, and approximately 3.2 acres in the south of the 3.8 acre facility (84%) are not covered by buildings or pavements. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. The assessment concluded that the site had a moderate potential for archeological resources and further investigation was warranted for the 3.2 acres believed to retain integrity. As a result of the Phase I survey, a total of 19 STPs were excavated at the George C. Farr USAR Center. A total of 7 artifacts was recovered, and resulted in the identification of Site 34PU350. Given the lack of research potential, and the scant quantity of and non-diagnostic nature of the artifacts recovered at 34PU350, the site was recommended not eligible for the NRHP. No further investigation of this facility was recommended and the Oklahoma State Archeologist and the Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1998.

The Tony K Burreis USAR Center is located at 2001 W. Iowa Ave, Chickasha, Oklahoma. The leased property will be returned to the City of Chickasha, as the Lessor, they have not provided the 63d RSC with their reuse plans for this property. Routinely, leased properties are made available for public uses.

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The facility is on 4.85 acres of land with two permanent structures: a 12,350-square-foot Training Building and a 1,325-square-foot organizational maintenance shop (OMS). Approximately half of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.), and the MEP area is covered with gravel. The remaining ground surface is covered by a maintained lawn area. The eastern, undeveloped portion of the Site has several deciduous trees. Trees are also present west of the Training Building, within the POV parking area and south of the fenced MEP area, along Minnesota Avenue. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the assessment, the archeological potential of the Burris USAR Center was considered to be high. The facility is close to surface water (100 feet from an intermittent source), and the slope is between 1-2%. The facility is located on somewhat poorly drained Parsons silt loam (Shingleton 1971). There was estimated to be approximately 2.2 acres around the main building, and in the southwest of this 4.3 acre facility (51%) not under buildings or pavements. In the course of the Phase I Survey, a total of 17 STPs were excavated at the Burris USAR Center. A total of 31 historical artifacts were recovered in 4 STPs excavated east of the main building, and in 1 STP excavated north of the building, resulting in the identification of historical Site 34GD184. The low density of artifacts recovered, and the lack of information from the artifacts as to the nature and function of the site, suggests low research potential for Site 34GD184. No further investigation of this facility was recommended and the Oklahoma State Archeologist and the Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1998.

The Donald A Roush USAR Center is located at 1720 Opal Street, Clinton, Oklahoma. The City of Clinton plans to use the Roush USAR Center as an adult education center and for other public services. The facility is on 4.75 acres of land with two permanent structures: a 9,632-square-foot Training Building and the 1,325-square-foot OMS. Approximately one-third of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by lawn area; there are landscaped shrubs immediately adjacent to the training building. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the assessment, the archeological potential of the Donald A. Roush USAR Center was considered to be low, and no further work was recommended. The Oklahoma State Archeologist concurred with this determination in a letter dated July 14, 1997, and the Oklahoma SHPO concurred with this determination in a letter dated February 2, 1998.

The Grady L. Robbins USAR Center is located at 116 W. Oxford, Enid, Oklahoma. The leased property will be returned to Garfield County, as the Lessor, they have not provided the 63d RSC with their reuse plans for this property. Routinely, leased properties are made available for public uses. The facility is on 4.96 acres of land with two permanent structures: a 19,077-square-foot Training Building and 1,325-square-foot OMS. Initial construction of the Training Building and OMS occurred in 1964. The kitchen area was added to the Training Building in 1984. A major modification to the Training Building in 1994 included expansion of the building to the west and addition of the assembly room. The training building walls are concrete block with stucco veneer, and the OMS walls are concrete block with brick veneer. Both buildings have concrete foundations. Approximately one-third of the site is covered by impervious surface features (e.g., paved parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by lawn area; there are landscaped shrubs adjacent to the training building and over 30-foot tall trees along the south side of the site and adjacent to West Oxford Avenue. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the assessment, the archeological potential of the Robbins USAR Center was considered to be low, and no further work was recommended. The Oklahoma State Archeologist and the Oklahoma SHPO concurred with this determination in a letter dated July 14, 1997.

The George D. Keathley USAR Center is located at 900 Cache Road Ne, Lawton, Oklahoma. The leased property will be returned to the City of Lawton, as the Lessor, they have not provided the 63d RSC with

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their reuse plans for this property. Routinely, leased properties are made available for public uses. The facility is on 4.13 acres of land with two permanent structures: an 18,937-square-foot Training Building and a 2,624-square-foot organizational maintenance shop (OMS). Approximately one-half of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by a landscaped lawn area. Several ornamental trees (deciduous and conifers) are present in the north (front) and east lawn areas. Small shrubs are immediately adjacent to the Training Building. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the assessment, the archeological potential of the Keathley USAR Center was considered to be low, and no further work was recommended. The Oklahoma State Archeologist and the Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1997.

The Floyd S. Parker USAR Center is located at 1016 E South Avenue, McAlester, Oklahoma. The leased property will be returned to the City of McAlester, as the Lessor, they have not provided the 63d RSC with their reuse plans for this property. Routinely, leased properties are made available for public uses. The facility is on 5.06 acres of land with two permanent structures: a 12,626-square-foot Training Building and a 1,959-square-foot OMS. Both buildings were constructed in 1959 of concrete block with brick veneer on a concrete slab. Approximately one-third of the Site is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.) while the remainder is covered by lawn, ornamental trees, and shrubbery. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the assessment, the archeological potential of the Parker USAR Center was considered to be low, and no further work was recommended. The Oklahoma State Archeologist and the Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1997.

The Alton M. Ashworth USAR Center is located at 1806 N York Street, Muskogee, Oklahoma. The leased property will be returned to the City of Muskogee, as the Lessor, they have not provided the 63d RSC with their reuse plans for this property. Routinely, leased properties are made available for public uses. The facility is on 5.55 acres of land with two permanent structures: thea 22,275-square-foot Training Building and the 3,315-square-foot OMS. Initial construction of the Training Building and OMS occurred in 1961. Approximately one-half of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The area around the buildings and parking lots is generally covered by grassed lawn area; there are landscaped shrubs immediately adjacent to the Training Building. The southwest corner of the Site contains some large (up to 40-foot tall) trees. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the archeological assessment, the archeological potential of the Alton M. Ashworth USAR Center was considered to be high. The facility is close to surface water (500 feet from an intermittent stream), and the slope is between 2-3%. The facility also is located adjacent to a cemetery established in 1894. Located on moderately well-drained Dennis silt loam, and Dennis-Urban land complex (Townsend et al. 1988), there were estimated to be approximately 3.2 acres in the northeast and southwest of this 5.8 acre facility (55%) not under buildings or pavements. An archeological survey was recommended of the 3.2 acres believed to retain integrity at the Alton M. Ashworth USAR Center. The Oklahoma Archeological Assessment Survey and Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1997. In the course of the Phase 1 Survey, 9 STPs were excavated, 41 artifacts was recovered in 4 STPs, and 36 artifacts were surface-collected, resulting in the identification of Site 34MS308. Despite the moderate density of artifacts recovered, the lack of structural features identified in association with the artifacts (i.e., foundations, footers, postholes, etc.), and the extensive disturbance identified within the site boundaries, suggests low research potential for Site 34MS308. The site was recommended not eligible for the NRHP. The Oklahoma State Archeologist and the Oklahoma SHPO concurred with our recommendation of no further investigation and the site as not eligible for listing on the NRHP in a letter dated July 14, 1998.

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The Joe A. Smalley USAR Center is located at 1507 West Lindsey, Norman, Oklahoma. The City of Norman plans to use the property for police and fire department offices. The facility is on 4.24 acres of land with one permanent structure: the 29,674-square-foot Training Building and attached 2,559-square-foot Organizational Maintenance Shop (OMS). Approximately two-thirds of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by a landscaped lawn area. Several ornamental trees are present along the front of the Training Building. Trees are also present along West Lindsey Street and Wylie Road. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the assessment, the archeological potential of the Smalley USAR Center was considered to be low, and no further work was recommended. The Oklahoma State Archeologist and Oklahoma SHPO concurred with this recommendation, in a letter dated July 14, 1997.

The Billy A. Krowse USAR Center is located at 2101 N.E. 36Th Street, Oklahoma City, Oklahoma. The leased property will be returned to the City of Oklahoma City, as the Lessor, they have not provided the 63d RSC with their reuse plans for this property. Routinely, leased properties are made available for public uses. The facility is on 4.6 acres of land with two permanent structures: the 60,747-square-foot Administration Building and the 6,363-square-foot OMS. Approximately 90% of the Site is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.), while the remainder is covered by lawn with occasional ornamental trees and shrubs. Trees line the western property boundary along North Martin Luther King Avenue. An archaeological assessment was completed in 1997 by Parsons Engineering Science, Inc. As a result of the assessment, the archeological potential of the Krowse USAR Center was considered to be low, and no further work was recommended. The Oklahoma State Archeologist and Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1997.

The Manuel A. Perez, Jr. USAR Center is located at 3021 W. Reno Ave, Oklahoma City, Oklahoma. The leased property will be returned to the City of Oklahoma City, as the Lessor, they have not provided the 63d RSC with their reuse plans for this property. Routinely, leased properties are made available for public uses. The facility is on approximately 4.45 acres of land with four permanent structures: a 17,950-square-foot Training Building, a 3,800-square-foot OMS, a the 120-square-foot flammable materials storage building, and a 450-square-foot vehicle wash rack. Approximately 60% of the 4.45-acre tract is occupied by impervious structures or paving (asphalt parking areas, driveways, concrete walkways, building footprints, etc.). Vegetation on the Site includes deciduous trees near the Training Building and landscape shrubbery adjacent to the Training Building. Vegetation on the remainder of the Site consists of mixed grasses. The 63rd RSC recently commissioned a historic building evaluation for the Manuel A. Perez, Jr. USAR Center, which is enclosed for your review. As a result of that survey, the 63rd RSC has determined the buildings are eligible for listing on the National Register of Historic Places under criterion G, cold war eligible. An archaeological assessment was completed in 1997. As a result of the archeological assessment, the archeological potential of the Manuel A. Perez USAR Center was considered to be moderate. The facility is close to surface water (within 100 feet of a tributary of the North Canadian River), and the slope is less than 1%. No information on soil type or this facility was available. There was estimated to be approximately 1.8 acres of this 4.4 acre facility (41%) that are not under buildings or pavements. However, the integrity of the area was questionable. The facility is located in a highly developed area, and the water source has been channelized, which reduces the archeological potential of the area. An archeological survey was recommended for the 1.8 acres in the north and south of the facility that were believed to retain integrity at the Manuel A. Perez USAR Center. The Oklahoma State Archeologist and Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1997. As a result of the Phase I survey, a total of 8 STPs excavated resulted in the recovery of no artifacts at the Manuel A. Perez USAR Center. No further investigation of this facility was

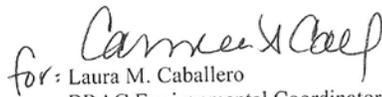
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recommended. The Oklahoma State Archeologist and Oklahoma SHPO concurred with this recommendation in a letter dated July 14, 1998.

The 63d RSC recently commissioned a historic building evaluation, through Brockington and Associates and determined based on the architectural survey that several buildings are not eligible for listing on the NRHP. The following facilities were determined not eligible for listing on the NRHP: George C. Farr USAR Center, Tony K. Burris USAR Center, Donald A. Roush USAR Center, Grady L. Robbins USAR Center, George D. Keathley USAR Center, Floyd S. Parker USAR Center, Alton M. Ashworth USAR Center, Joe A. Smalley USAR Center, and Billy A. Krowse USAR Center, these surveys are enclosed for your review. In addition from this survey, the 63rd RSC has determined that the following buildings are determined eligible for listing on the NRHP: The Manuel A. Perez USAR Center, this survey is enclosed for your review.

Based on our determinations of eligibility, the 63d RSC has determined that there will be *no adverse effect* on historic properties as a result of the proposed property transfers noted above. We request your concurrence and comments on the 63d RSC determinations and the enclosed documentation within 30 days of receiving this letter and its supporting documentation. If you have any further questions please contact the undersigned at (650) 793-8273.

Sincerely,

for:   
Laura M. Caballero  
BRAC Environmental Coordinator  
63<sup>rd</sup> Regional Support Command

Enclosures



**Oklahoma Historical Society**

Founded May 27, 1893

**State Historic Preservation Office**

Oklahoma History Center • 800 Nazih Zuhdi Drive • Oklahoma City, OK 73105-7917  
(405) 521-6249 • Fax (405) 522-0816 • [www.okhistory.org/shpo/shpom.htm](http://www.okhistory.org/shpo/shpom.htm)

June 1, 2011

Ms. Laura Caballero  
BRAC Environmental Coordinator  
U.S. Army HQ, 63rd Regional Support Cmd.  
P.O. Box 63  
Moffett Field, CA 94035-1000

RE: File #1157-11; U.S. Army BRAC Project for 10 Army Reserve  
Centers in Oklahoma (Listed on the Attachment to this Letter)

Dear Ms. Caballero:

We have received and reviewed the documentation concerning the referenced project in Oklahoma. Additionally, we have examined the information contained in the Oklahoma Landmarks Inventory (OLI) files and other materials on historic resources available in our office. We find that there are no historic properties affected by the referenced project.

Thank you for the opportunity to comment on this project. We look forward to working with you in the future.

Should further correspondence pertaining to this project be necessary, please reference the above underlined file number. If you have any questions, please contact Ms. Lynda Schwan, Architectural Historian, at 405/522-4478. Thank you.

Sincerely,

Melvena Heisch  
Deputy State Historic  
Preservation Officer

MH:pm

Attachment

cc: Mr. Charles Philips, Jr., Brockington & Associates

FILE #	LIST OF PROPERTIES
1157-11	<p>US ARMY BRAC PROJECT FOR 10 RESERVE CENTERS IN OKLAHOMA</p> <ol style="list-style-type: none"> <li>1. GEORGE FARR ARMY RESERVE CENTER #OK002, 710 SOUTHWEST C, ANTLERS, PUSHMATAHA COUNTY A. MAIN BUILDING #P1001 B. SUPPORT BUILDING #P1002</li> <li>2. TONY BURRIS ARMY RESERVE CENTER #OK006, 2001 IOWA AVENUE, CHICKASHA, GRADY COUNTY A. MAIN BUILDING #P1001 B. SUPPORT BUILDING #P1002 C. SHED #P1004</li> <li>3. DONALD ROUSH ARMY RESERVE CENTER #OK007, 1720 OPAL, CLINTON, CUSTER COUNTY A. MAIN BUILDING #P1001 B. SUPPORT BUILDING #P1002</li> <li>4. GRADY ROBBINS ARMY RESERVE CENTER #OK010, 116 WEST OXFORD ROAD, ENID, GARFIELD COUNTY A. MAIN BUILDING #P1001 B. SUPPORT BUILDING #P1002</li> <li>5. GEORGE KEATHLEY ARMY RESERVE CENTER #OK014, 900 CACHE ROAD, LAWTON, COMANCHE COUNTY A. MAIN BUILDING #P1001 B. SUPPORT BUILDING #P1002</li> <li>6. FLOYD PARKER ARMY RESERVE CENTER #OK015, 1016 EAST SOUTH STREET, McALESTER, PITTSBURG COUNTY A. MAIN BUILDING #P1001 B. SUPPORT BUILDING #P1002</li> <li>7. ALTON ASHWORTH ARMY RESERVE CENTER #OK018, 1806 NORTH YORK, MUSKOGEE, MUSKOGEE COUNTY A. MAIN BUILDING #P1001 B. SUPPORT BUILDING #P1002</li> <li>8. JOE SMALLEY ARMY RESERVE CENTER #OK020, 1507 WEST LINDSEY, NORMAN, CLEVELAND COUNTY A. MAIN BUILDING #P1001 B. SHOP BUILDING #P2002</li> </ol>

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9. MANUEL PEREZ ARMY RESERVE CENTER  
#OK023, 3021 WEST RENO AVENUE,  
OKLAHOMA CITY, OKLAHOMA COUNTY
    - A. MAIN BUILDING #P2001
    - B. SUPPORT BUILDING #P2002
    - C. BUILDING #P2005 (BUILT CA 1991)
  
  10. BILLY KROWSE ARMY RESERVE CENTER  
#OK024, 2100 NORTHEAST 36TH,  
OKLAHOMA CITY, OKLAHOMA COUNTY
    - A. MAIN BUILDING #P1001
    - B. SUPPORT BUILDING #P1002



## Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

July 14, 1998

Cynthia A. Whitley  
Senior Archaeologist  
Parsons Engineering Sciences, Inc.  
10521 Rosehaven Street  
Fairfax, VA 22030

Re: *Draft Archeological Phase I Survey of Eight 90<sup>th</sup> Regional Support  
Command Facilities in Oklahoma.*

Dear Ms. Whitley:

I have completed a review of the above referenced document. Prior evaluation of 20 RSC facilities in Oklahoma resulted in eight of these locations being recommended for a cultural resource (archaeological) field inventory. The eight facilities were George C. Farr in Antlers, Tony K. Burris in Chickasha, Floyd S. Parker in McAlester, Alton M. Ashworth in Muskogee, Manuel A. Perez in Oklahoma City, George D. Swanson in Okmulgee, Tracy W. Young in Ponca City, and Cleo O. Payne in Stillwater. The eight facilities were examined by personnel from Parsons Engineering between March 18 and 31, 1998. Field examination consisting of a surface walk-over and shovel testing resulted in the recording of one prehistoric archaeological site (34PU350) in the George C. Farr facility, an historic archaeological site (34GD184) in the Tony K. Burris facility, and an historic archaeological site (34MS308) in the Alton M. Ashworth facility. In addition, isolated finds of historic materials were found in two other facilities. None of the examined sites appear to contain the necessary content or context for National Register of Historic Places eligibility. Thus, I concur with the assessment that no further work is warranted at the eight RSC facilities.

This review has been conducted in cooperation with the State Historic Preservation Office, Oklahoma Historical Society.

Sincerely,

Robert L. Brooks  
State Archaeologist

cc: SHPO

111 E. Chesapeake, Norman, Oklahoma 73019-0575 PHONE: (405) 325-7211 FAX: (405) 325-7804  
A UNIT OF ARTS AND SCIENCES SERVING THE PEOPLE OF OKLAHOMA



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Chairman Louis Maynahonah  
Apache Tribe of Oklahoma  
P.O. Box 1330  
Anadarko, OK 73005

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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

The purpose and need of the closure, disposal, and reuse of the Roush USARC is to meet the requirements of the Base Closure and Realignment Act. The Roush USARC is located at 1720 Opal Street, Clinton, Custer County, Oklahoma. The site is 4.75 acres in size and contains two permanent buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Two alternatives are being considered for the proposed action and both would occur at the current location of the Roush USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since the Reserve mission at the Roush USARC ended in September 2004, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the property, the Army has provided and will continue to provide minimum sufficient maintenance to



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Chairman Ronald Twohatchet  
Kiowa Indian Tribe of Oklahoma  
P.O. Box 369  
Carnegie, OK 73015

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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The purpose and need of the closure, disposal, and reuse of the Roush USARC is to meet the requirements of the Base Closure and Realignment Act. The Roush USARC is located at 1720 Opal Street, Clinton, Custer County, Oklahoma. The site is 4.75 acres in size and contains two permanent buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Two alternatives are being considered for the proposed action and both would occur at the current location of the Roush USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since the Reserve mission at the Roush USARC ended in September 2004, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the property, the Army has provided and will continue to provide minimum sufficient maintenance to



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

President Leslie Standing  
Wichita and Affiliated Tribes  
P.O. Box 729  
Anadarko, OK 73005

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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The purpose and need of the closure, disposal, and reuse of the Roush USARC is to meet the requirements of the Base Closure and Realignment Act. The Roush USARC is located at 1720 Opal Street, Clinton, Custer County, Oklahoma. The site is 4.75 acres in size and contains two permanent buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Two alternatives are being considered for the proposed action and both would occur at the current location of the Roush USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since the Reserve mission at the Roush USARC ended in September 2004, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the property, the Army has provided and will continue to provide minimum sufficient maintenance to



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

22 March 2012

Mr. Jimmy W. Arterberry  
Historic Preservation Officer  
Comanche Nation Historic Preservation Office  
#6 SW 'D' Avenue, Suite A  
Lawton, Oklahoma 73507

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Mr. Arterberry:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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NEPA requires that alternatives to the proposed action are analyzed. Two alternatives are being considered for the proposed action and both would occur at the current location of the Roush USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since the Reserve mission at the Roush USARC ended in September 2004, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the property, the Army has provided and will continue to provide minimum sufficient maintenance to



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Governor Janice Boswell  
Cheyenne and Arapaho Tribes  
P.O. Box 38  
Concho, OK 73022

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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### **A.3 USFWS Consultation**

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

<u>Agency</u>	<u>Date</u>
Letter to USFWS (Initial Consultation)	5 March 2012
Official Species List - Oklahoma Ecological Services Field Office	18 January 2012



DEPARTMENT OF THE ARMY  
HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND  
P.O. BOX 63  
MOFFETT FIELD, CALIFORNIA 94035

REPLY TO  
ATTENTION

5 March 2012

Mr. Luke Bell  
US Fish and Wildlife Service  
Oklahoma Ecological Services Field Office  
9014 East 21st Street  
Tulsa, OK 74129

RE: Environmental Assessment for the Closure, Disposal, and Reuse of the Donald A. Roush U.S. Army Reserve Center in Clinton, Oklahoma.

Dear Ms. Smith:

The United States Army Reserve 63rd Regional Support Command is preparing an Environmental Assessment (EA) for the proposed action of closure, disposal, and reuse of the Donald A. Roush U.S. Army Reserve Center (Roush USARC). The EA is being prepared in accordance with Council on Environmental Quality regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) and *Environmental Analysis of Army Actions*, 32 CFR Part 651.

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

The purpose and need of the closure, disposal, and reuse of the Roush USARC is to meet the requirements of the Base Closure and Realignment Act. The Roush USARC is located at 1720 Opal Street, Clinton, Custer County, Oklahoma. The site is 4.75 acres in size and contains two permanent buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

NEPA requires that alternatives to the proposed action are analyzed. Two alternatives are being considered for the proposed action and both would occur at the current location of the Roush USARC. The No Action Alternative (Alternative 1) represents baseline conditions at the property. No change from the current activities would occur under this alternative. Since the Reserve mission at the Roush USARC ended in September 2004, the No Action Alternative consists of Army caretaker status rather than use of the Property for training by the Army Reserve. From the time of operational closure until conveyance of the property, the Army has provided and will continue to provide minimum sufficient maintenance to

preserve and protect the site for reuse in an economical manner that facilitates redevelopment. Current caretaker activities include quarterly building checks and maintenance, and lawn mowing as needed. The No Action Alternative allows comparison of impacts between the current caretaker status and the proposed reuse.

The Army's Preferred Alternative (Alternative 2) involves the disposal and reuse of the Roush USARC. The Army would transfer, via negotiated sale, the 4.75 acres to the City of Clinton. The facility would provide a location for a range of community services potentially including adult conversational English classes; adult conversational Spanish classes; expanded adult information technology opportunities for senior citizens; a community planning center; centralized shipping and receiving; and a family resource center.

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

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

Comments on the proposed action and the alternatives will be accepted for 30 calendar days from the date on this letter. Comments received during this time will be used in preparation of the EA. Written comments should be submitted to: Ms. Carmen Call, 63D RSC, Attn: ARRC-SCA-PWE, P.O. Box 63, Moffett Field, California 94035 or by email at [carmen.call@usar.army.mil](mailto:carmen.call@usar.army.mil). If you have any questions, please contact me at 650-279-1823 or at the above referenced email address.

We look forward to working cooperatively with you to make this important project successful for all parties involved.

Sincerely,



Ms. Carmen Call  
Environmental Protection Specialist  
63D Regional Support Command, DPW

Enclosures  
Figure 1: Location Map  
Figure 2: Current Site Plan







United States Department of Interior  
Fish and Wildlife Service

Project name: BRAC disposal and reuse of the Roush USARC

## Official Species-list: *BRAC disposal and reuse of the Roush USARC*

### Oklahoma Ecological Services Field Office

Following is an official U.S. Fish and Wildlife Service species-list from the Oklahoma Ecological Services Field Office. The species-list identifies listed and proposed species and designated and proposed critical habitat that may be affected by the project "BRAC disposal and reuse of the Roush USARC". You may use this list to meet the requirements of section 7(c) of the Endangered Species Act of 1973, as amended (ESA).

This species-list has been generated by the Service's on-line Information, Planning, and Conservation (IPaC) decision support system based on project type and location information you provided on January 18, 2012, 10:07 AM. This information is summarized below.

Please reference our tracking number, 02EKOK00-2012-SLI-0182, in future reference to this project to assist in expediting the process.

Newer information based on updated surveys, changes in the abundance and distribution of listed species, changed habitat conditions, or other factors could change this list. Please feel free to contact the office(s) identified below if you need more current information or assistance regarding the potential presence of federally proposed, listed, or candidate species, or proposed or designated critical habitat. Please note that under the ESA, a species-list is valid for 90 days. Therefore, the Service recommends that you visit the IPaC site at regular intervals during project planning and implementation for updates to species-lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive this list. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

This list below only addresses federally proposed, listed, or candidate species and federally designated critical habitat. Please contact the appropriate State agencies for information regarding State species of special designation. Also, please feel free to contact the office(s) identified below if you would like information on other important trust resources (such as migratory birds) in your project area.

Generated by the Information, Planning, and Conservation (IPaC) System on 01/18/2012 10:07 AM

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United States Department of Interior  
Fish and Wildlife Service

Project name: BRAC disposal and reuse of the Roush USARC

**This Species-list document is provided by:**

OKLAHOMA ECOLOGICAL SERVICES FIELD OFFICE  
9014 EAST 21ST STREET  
TULSA, OK 74129  
(918) 581-7458  
<http://www.fws.gov/southwest/es/Oklahoma/>

**TAILS consultation code:** 02EKOK00-2012-SLI-0182

**Project type:** Land - Disposal / Transfer

**Project Description:** ENVIRONMENTAL ASSESSMENT  
FOR BRAC 2005 RECOMMENDATIONS FOR DISPOSAL AND REUSE OF THE DONALD A. ROUSH  
UNITED STATES ARMY RESERVE CENTER  
CLINTON, OKLAHOMA  
Disposal to City of Clinton for use for public services

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United States Department of Interior  
Fish and Wildlife Service

Project name: BRAC disposal and reuse of the Roush USARC

**Project location map:**



**Project coordinates:** MULTIPOLYGON (((-98.982062 35.506621, -98.980796 35.5066103, -98.9807745 35.5048507, -98.9820405 35.5047864, -98.982062 35.506621)))

**Project counties:** Custer, OK

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United States Department of Interior  
Fish and Wildlife Service

Project name: BRAC disposal and reuse of the Roush USARC

### Endangered Species Act Species-list

Arkansas River shiner (*Notropis girardi*)

Population: Arkansas R. Basin

Listing Status: Threatened

Least tern (*Sterna antillarum*)

Population: interior pop.

Listing Status: Endangered

Piping Plover (*Charadrius melodus*)

Population: except Great Lakes watershed

Listing Status: Threatened

Whooping crane (*Grus americana*)

Population: except where EXPN

Listing Status: Endangered

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#### **A.4 Agency and Public Notices**

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

- Clinton Daily News
- Oklahoman

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

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

- Clinton Public Library

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## PUBLIC NOTICE OF AVAILABILITY

### **Environmental Assessment (EA) and Draft Finding of No Significant Impact (FNSI) Closure, Disposal and Reuse of the Roush United States Army Reserve Center (USARC) Clinton, Oklahoma**

Pursuant to the Council on Environmental Quality regulations for implementing the National Environmental Policy Act of 1969 (40 CFR 1500), and Environmental Analysis of Army Actions (32 CFR 651), the Army has conducted an EA to analyze the effects to the human environment associated with the Defense Base Closure and Realignment (BRAC) Commission's recommendations of the closure, disposal and reuse of the Roush USARC, located at 1720 Opal Street, Clinton, Custer County, Oklahoma.

**Public Availability:** The EA and draft FNSI are available for a 30-day public comment period after publication of this Notice of Availability. The EA and the Draft FNSI are available for review at the Clinton Public Library (721 Frisco, Clinton, Oklahoma 73601), and on the BRAC website at [http://www.hqda.army.mil/acsim/brac/env\\_ea\\_review.htm](http://www.hqda.army.mil/acsim/brac/env_ea_review.htm). Written comments should be submitted to the NEPA Coordinator of the 63D Regional Support Command (63D RSC), AFRC-SCA-PWE (Carmen Call), P.O. Box 63, Moffett Field, California 94035-0063 or [carmen.call@usar.army.mil](mailto:carmen.call@usar.army.mil).

## APPENDIX B – EIFS REPORT

### Introduction

The Economic Impact Forecast System (EIFS) model provides a systematic method for evaluating the regional socioeconomic effects of government actions, particularly military actions. Using employment and income multipliers developed with a comprehensive regional/local database combined with economic export base techniques, the EIFS model estimates the regional economic impacts in terms of changes in employment generated, changes in population, and expenditures directly and indirectly resulting from project construction. The EIFS model evaluates economic impacts in terms of regional change in business volume, employment and personal income, and expenditures for local and regional services, materials, and supplies. Although the EIFS model does not provide an exact measure of actual dollar amounts, it does offer an accurate relative comparison of alternatives. The total construction costs for this project are approximately \$250,000. It is assumed that 60 percent of construction costs reflect materials and supplies (\$150,000); 30 percent for labor (\$75,000), and 10 percent for profit/overhead (\$25,000). The actual construction cost (\$150,000) was used for the changes in local expenditures forecast input below. The change in civilian employment forecast input below was determined by dividing the 30 percent labor number (\$75,000) by the Bureau of Labor Statistics Wages by area and occupation for construction and extraction workers in the Custer County, Oklahoma area (\$35,640). This resulted in an input of 2.

### EIFS REPORT

PROJECT NAME				
Roush BRAC EA - Alternative 2				
STUDY AREA				
40147 Washington, OK				
FORECAST INPUT				
Change In Local Expenditures		\$150,000		
Change In Civilian Employment		2		
Average Income of Affected Civilian		\$35,640		
Percent Expected to Relocate		0		
Change In Military Employment		0		
Average Income of Affected Military		\$0		
Percent of Military Living On-post		0		
FORECAST OUTPUT				
Employment Multiplier		2.51		
Income Multiplier		2.51		
Sales Volume - Direct		\$147,548		
Sales Volume - Induced		\$222,798		
Sales Volume - Total		\$370,346	0.03%	
Income - Direct		\$99,313		
Income - Induced)		\$69,213		
Income - Total(place of work)		\$168,526	0.01%	
Employment - Direct		3		
Employment - Induced		2		
Employment - Total		5	0.02%	
Local Population		0		
Local Off-base Population		0	0%	
RTV SUMMARY				
	Sales Volume	Income	Employment	Population
<b>Positive RTV</b>	11.44 %	7.77 %	8.46 %	5.16 %
<b>Negative RTV</b>	-12.08 %	-6.26 %	-6.77 %	-2.46 %

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## **APPENDIX C – LEGAL AND REGULATORY FRAMEWORK FOR BRAC DISPOSAL AND REUSE PROCESS**

On September 8, 2005, the Defense BRAC Commission recommended closure of the Roush USARC in Clinton, Oklahoma. This recommendation was approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission’s recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense BRAC of 1990 (Public Law 101-510), as amended.

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

*“Close the Farr United States Army Reserve Center, Antlers, OK, the **Roush United States Army Reserve Center, Clinton, OK**, the Smalley United States Army Reserve Center, Norman, OK and relocate units into a new Armed Forces Reserve Center and Consolidated Maintenance Facility on the Norman Military Complex, Norman, OK. The new AFRC shall have the capability to accommodate Oklahoma Army National Guard units from the following Oklahoma Army National Guard facilities: Oklahoma Army National Guard Readiness Centers in Tonkawa, OK, Konawa, OK, Wewoka, OK, Oklahoma City (23rd Street), OK, the 23d Street Field Maintenance Shop in Oklahoma City, the Consolidated Maintenance Facility on the Norman Military Complex, Norman, OK and C CO, 700th Support Battalion from the Readiness Center, Edmond, OK if the State of Oklahoma decides to relocate those National Guard units.”*

To implement these recommendations, the Army closed the Roush USARC in May 2006.

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

### **Relevant Statutes and Executive Orders**

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

EO 11988 (Floodplain Management)

EO 11990 (Protection of Wetlands)

EO 12088 (Federal Compliance with Pollution Control Standards)

- 
- EO 12580 (Superfund Implementation)
  - EO 12873 (Federal Acquisition, Recycling and Waste Prevention)
  - EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations)
  - EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks)
  - EO 13175 (Consultation and Coordination with Indian Tribal Governments)
  - EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds)
  - EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management)

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

### **Other Reuse Regulations and Guidance**

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

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**APPENDIX D –ROUSH USARC REUSE PLAN**

Appendix D contains the following documents associated with reuse of the Roush USARC:

<b><u>Document</u></b>	<b><u>Date</u></b>
Redevelopment Plan Concerning the Reuse of the Donald A. Roush U.S. Army Reserve Center Submitted By: City of Clinton, Oklahoma Local Redevelopment Authority	August 2009

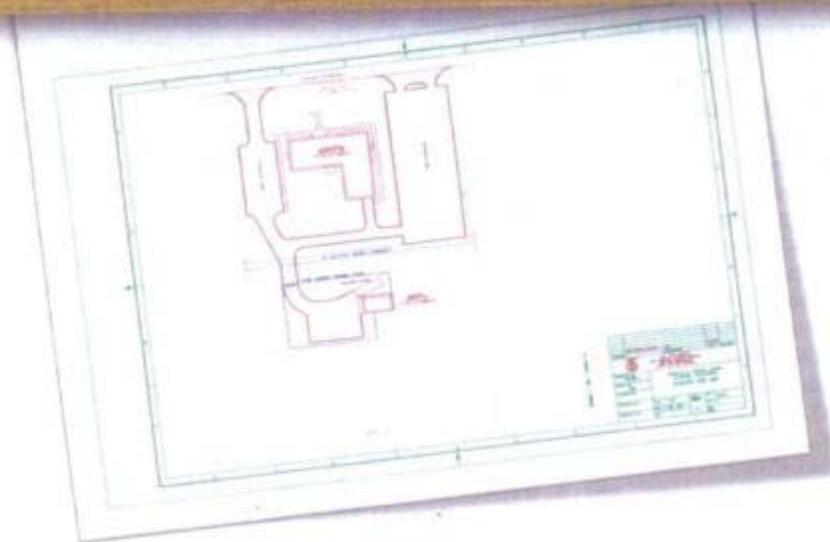
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**Redevelopment Plan Concerning the Reuse of the  
Donald A. Roush U.S. Army Reserve Center**

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**Local Redevelopment Authority (LRA)  
City of Clinton, Oklahoma**

**LRA Members:**

Terry Harms, Chris Jones, Sherri Klein, Hong Kluver, Mayor Lynn Norman,  
Ron Stephenson, Carl Vincent, Kevin Wolters

**Redevelopment Plan Concerning the Reuse of the  
Donald A. Roush U.S. Army Reserve Center  
City of Clinton, Oklahoma**

**Purpose and Need**

The Donald A. Roush U.S. Army Reserve Center (USAR) was declared surplus under the authority of the U.S. Department of Defense (DOD) 1990 Base Realignment and Closure 1990 (BRAC). This Redevelopment Plan is intended to provide a vision for the future use and redevelopment of the site.

**Site Location and History**

The site is located at 1720 Opal Street in Clinton, Custer County, Oklahoma. Clinton is approximately 85 miles west of Oklahoma City, Oklahoma on Interstate 40 and approximately 65 miles east of the Texas/Oklahoma state line. Clinton has a population of approximately 8,500 and Custer County has a population of 25,000. The site is in a developed area in the southwest part of Clinton and covers 4.75 acres of land. The project site is zoned Residential-1 (**Appendix A-1, Zoning Map**). It is bordered by residential areas to the west, north, and east, and the Clinton High School campus to the south. (**Appendix A-2, Aerial photo of project site**)The site served as a United States Army Reserve (USAR) Center since the U.S. government acquired the land in 1958. The site primarily functioned as an administrative and educational facility, with limited maintenance of military vehicles. The site was historically used by reservists for drill activities on various weekends throughout the year. The USAR Center involves three permanent structures and a parking lot (**Appendix A-3, Donald A Roush USARC Site Map**). The main building is a 9,679 square foot reserve center building/drill hall (**Appendix A-4, Training Building Floor Plan**), 1,325 square foot maintenance shop (**Appendix A-5, Maintenance Bay Floor Plan**), and a 36 square foot flammable material building. The main reserve center building is an irregular shaped, one story building built in 1960, which consists of office space, classrooms, storage, and a two-story drill hall. The maintenance shop was constructed in 1961, and flammable material building in 1963. The buildings, parking areas, driveways, walkways cover approximately 40% of the property. An Environmental Condition of Property Report was prepared by the U.S. Department of Defense Environmental Division for submission to the U.S. Army Corps of Engineers (**Appendix B, Environmental Condition of Property Report, March 23, 2007**).

The USAR Center was closed in 2004 and remains inactive. The last USAR unit based in this USAR Center was the 818<sup>th</sup> Replacement Company. Other units historically based at the site prior to the 818<sup>th</sup> Replacement Company included the 313<sup>th</sup> Training Brigade Unit, a Drill Sergeant Unit, and USAR Postal Service Unit.

### Plan, Policy and Program Guidance

In creating the redevelopment plan for the Donald A. Roush USAR Center, the city and its stakeholders considered not only the adjacent neighborhood but the overall community and were also mindful that redevelopment of the site must serve today's residents as well as future generations. In achieving these objectives, the City of Clinton and its partners balanced a number of local and federal requirements and policy objectives, including:

- Responding to Change: Communities & BRAC
- Community Involvement With BRAC
- Guidebook on Military Base Reuse and Homeless Assistance

### Local Redevelopment Authority

The DOD recognizes a Local Redevelopment Authority (LRA) as the entity responsible for creating a redevelopment plan for military facilities in a BRAC process. The DOD considers the LRA's plan before transferring any property for redevelopment to non federal entities. This provides one local point of contact for the DOD as well as efficient property transfer and community consensus for redevelopment plans. The process is governed by the DOD's Base Redevelopment and Realignment Manual and the associated sections of the Code of Federal Regulations (CFR) that are referenced by the manual and Department of Housing and Urban Development and its CFR sections. The Office of Economic Adjustment (OEA) designates the LRA to manage the public process for the redevelopment plan and ultimately deliver a plan that balances the needs of the community and the Army.

In June 2006 the Clinton City Council voted to establish the Clinton Urban Renewal Authority (**Appendix C-1, Resolution #750**). The Urban Renewal Authority, comprised of the mayor and four councilmen, appointed the Local Redevelopment Authority (LRA) for the Donald A. Roush USAR Center. (**Appendix C-2, Resolution #755**) See also **Appendix D-1, Roush Center Disposal Process Now Beginning-news article**.

The political jurisdictions that comprise the LRA are the City of Clinton and the following members, all of whom are citizens of Clinton, Oklahoma.

Terry Harms, Bank of the West

Chris Jones, InterBank

Sherri Klein, Production Credit

Hong Kløver, Retail Trade

Mayor Lynn Norman, City of Clinton

Ron Stephenson, Independent Electrical Contractor

Carl Vincent, Information Technology Clinton Public Schools

Kevin Wolters, S.W. Distributor

**(Appendix D-2, Local BRAC Authority Named-news article)**

The LRA is charged with creating a redevelopment plan for the Donald A. Roush USAR Center site that balances the needs of the homeless with economic and other development needs of the community. The LRA should:

Conduct outreach to homeless assistance providers and other eligible recipients of public benefit property transfers, including announcement of availability of surplus property for homeless and public benefit conveyance;

- Provide leadership and build consensus for the redevelopment plan;
- Consult with the Military Departments on personal property disposal; and
- Serve as the single community point of contact.

#### Overview of the NOI Process and Redevelopment Program

Under the BRAC program, portions of surplus military bases may be conveyed at no cost for housing or services for homeless people, and conveyed at a reduced or no cost for other federally designated public uses. The LRA is responsible for soliciting and evaluating Notices of Interest (NOIs) from agencies or organizations requesting properties for a specific federally qualified use. "Public benefit conveyances" can be made for uses such as public health, self-help housing, homeless housing, or open space. Specifically, the LRA must to the following:

1. Announce the availability of surplus property for homeless and public benefit conveyances;
2. Give applicants at least 90 days and no more than 180 days to submit Notices of Interest;
3. Consider all Notices of Interest; and
4. Review applications and determine those to be included in redevelopment plan.

#### Process Management

The "PUBLIC NOTICE OF TIME FRAME FOR EXPRESSION OF INTEREST FOR HOMELESS PROVIDERS AND NON-FEDERAL PUBLIC AGENCIES RE: ARMY SURPLUS PROPERTY LOCATED AT THE DONALD A. ROUSH U.S. ARMY RESERVE CENTER, CLINTON, CUSTER, COUNTY, OKLAHOMA" was published on June 2, 2006 in the Clinton Daily News. This publication set the time frame for the NOI as ending 5:00 p.m. September, 18, 2006. Public Notifications are located in **Appendix E**.

#### Process Management-Homeless Providers

The LRA has consulted with the homeless provider community in the City of Clinton.

All of these entities may have at one time reportedly or possibly been considered homeless providers. A recent search of the Oklahoma Housing Finance Agency web site only reports two homeless service providers in Clinton, Oklahoma. Those two are, Mission House, Inc., which if fully operational, and the defunct 4<sup>th</sup> Street Rescue Mission. (**Appendix F-1, OHFA Listings**).

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#### **Mission House, Inc.**

Officials of Mission House, Inc., a homeless shelter located at 300 South Seventh Street, Clinton, Oklahoma, were consulted about their interest in the USAR Center. The Mission House, Inc. provides food, shelter, clothing, and a variety of emergency assistance to the needy. A thrift store is operated in order to recycle used clothing and household goods to those in need. This facility receives no federal, state or local government funding. Funds received from the thrift store sales and from local donations is the only source of income for the operation. In the last three calendar years, services provided by Mission House, Inc. include:

- Overnight shelter to 14,488 persons, an average of 13 each night at a cost of about \$10.00 per night.
- Fed 38,229 persons in that period, an average of 35 meals per day at a cost of about \$2.60 per meal.
- Provided 1,893 food baskets, an average of 2 per day at a value of \$40.00 per basket.
- Supplies of baby formula, diapers, blankets, fans, and furniture are available to the needy.

Mission House representatives toured the USAR Center on two different occasions with the city. The Mission House Board of Director's determined that they had no interest in occupying the facility, but in fact, had a desperate need for a number of the kitchen items (**Appendix F-2, Inventory of Desired Items**). Letters from the Mission House dated September 12, 2006 (**Appendix F-3**) and October 30, 2007 (**Appendix F-4**) reaffirm their desire for the kitchen equipment. The letter of September 12, 2006 was accepted as the Mission House's NOI.

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#### **Custer County Department of Human Services**

The Custer County Department of Human Services, 190 South 31<sup>st</sup> Street, Clinton, Oklahoma does not provide housing to the homeless in the city or county. The agency has no interest in the USAR Center and has no objection to the City of Clinton gaining possession of the property (**Appendix F-5**).

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#### **Multi-County Youth Services Center**

The Multi-County Youth Services Center, 600 Avant, Clinton, Oklahoma provides temporary shelter for abused and neglected children. The center has no interest in using the USAR Center (**Appendix F-6**).

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#### **Action Associates, Inc.**

Action Associates, Inc, 2500 State South State Hwy 183, Clinton, Oklahoma, is not a homeless shelter provider. The agency assists victims of domestic violence. Action Associates, Inc. has no interest in the USAR Center. (**Appendix F-7**)

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### Red Rock West Behavioral Services

Red Rock Behavioral Health Service, Western Region, 94 North 31<sup>st</sup> Street, Clinton, Oklahoma is a not for profit, private community mental health center. Red Rock serves as the point of contact for the Oklahoma Balance of State (BOS) Continuum of Care (CoC). The city has visited with the agency and learned that it is not feasible for Red Rock to use the surplus property. **(Appendix F-8)**

Red Rock's point in time count from January 29, 2009 is included. However, the count includes the 17 county area covered by the OK BOS for western Oklahoma. The information regarding the Clinton, Oklahoma agencies is marked. **(Appendix F-8)**

### No longer provide services; (These businesses are closed or defunct)

- 4<sup>th</sup> Street Rescue Mission
- Opportunities, Inc. Behavioral Care (halfway house)

### Facility Name Change

New Horizons, APRD is now Red Rock West Behavioral Services

### Process Management-Local Redevelopment Authority

Numerous tours of the facility were conducted for interested parties.

The Local Redevelopment Authority conducted a public workshop on September 26, 2006 located at the Frisco Center located at 101 South 4<sup>th</sup> Street, Clinton, Oklahoma. The workshop was conducted by Mr. J. Lynn Boese, Project Manager, Officer of Economic Adjustment, and Office of the Secretary of Defense.

The workshop was designed to provide information about the closure/reassignment and disposal process and to answer questions about the LRA's process. Hand outs provided were "Community Involvement With BRAC" **(Appendix G, sign-in and handout for workshop)**

### Balance Determination

The city's published notice of availability of property requested NOI's be submitted by 5:00 p.m., September 18, 2006. Four notices of interest were submitted, which are summarized below. The LRA considered all submittals.

- Mission House, Inc. strongly desires to gain access to a number of the kitchen items located in the Donald A. Roush USAR Center in order to better serve the homeless.
- Local contractor proposal for a gated senior living center. Community would consist of single family detached homes designed and focused to fulfill the Clinton senior adult need.
- Army National Guard proposal to gain ownership of the Donald A. Roush USAR Center in order to use the facility for current training activities. The Oklahoma National Guard currently holds, by Fee Simple Title, Lots 17, 18, 19, 20, and 21 of Block 8 Lancaster's Addition to the City of Clinton and currently is housed on this property but needs

additional space such as the Donald A. Roush USAR Center has to offer. The proposal requested a transfer of one deed for the other with the city.

- Clinton Public School proposal outlined several options of use. (1) An Army Junior Reserve Officer's Training Corps. Program would be established by the school system and ran at the USAR Center. (2) The school proposes to use the facility as a family resource center. (3) Future plans for the school administration to move to the complex.

Initially the preferred reuse of the Donald A. Roush USAR Center was for educational purposes; however, the school district ultimately decided it had no interest in the property. The LRA after considering all the other reuse possibilities determined that the community's most pressing need was for a multi-purpose facility. (**Appendix H, LRA Meeting sign-in sheets**)

#### Redevelopment Plan

LRA members weighed a variety of possible uses but determined the best reuse of the facility would be to house a variety of public services that are not otherwise appropriately sited in the community. Thus it was the LRA's determination that the USAR Center be acquired by the City of Clinton and used to provide a location for a range of public services. The uses envisioned for the site potentially include, but are limited to;

- Adult conversational English classes
- Adult conversational Spanish classes
- Expanded adult information technology opportunities for senior citizens
- Community planning center
- Centralized shipping and receiving
- Family resource center

#### Public Review & Comment

The redevelopment plan was made available to the public for review and comment at Clinton City Hall July 22, 2009 through August 4, 2009 from 8:00 a.m. to 5:00 p.m. A posted public hearing was held August 4, 2009, 5:30 p.m. to receive final comments on the redevelopment plan. One comment was made, encouraging the use of the Donald A. Roush U.S. Army Reserve Center for a ROTC program. Information concerning this review is located **Appendix E-4, E-5, & D-3.**



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

FEB 18 2010

The Honorable Allen Bryson  
Mayor of Clinton  
415 Gary Boulevard  
Clinton, OK 73601

Dear Mayor Bryson:

I am pleased to inform you of the Department of Housing and Urban Development's final determination that the *Redevelopment Plan Concerning the Reuse of the Donald A. Roush U.S. Army Reserve Center* (the Plan), dated February 27, 2008, revised August 12, 2009, with supplemental information dated December 15, 2009, complies with the requirements of the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 (the Act), as amended, and its implementing regulations found at 24 CFR Part 586. The City of Clinton may now move forward with implementing the Plan, including pursuing a negotiated sale of the property for public purposes. The basis for HUD's determination is discussed below.

HUD has determined that the plan appropriately balances the needs of the community in the vicinity of the installation for economic redevelopment and other development with the needs of the homeless in the community. The basis for this determination is the fact that despite the Local Redevelopment Authority having carried out the required outreach to representatives of the homeless, no notices of interest to obtain base real property for use to assist the homeless were submitted. As to the homeless assistance notice of interest submitted by Mission House, Inc., for various kitchen equipment and dining room tables, the request was withdrawn via letter dated November 25, 2009. HUD's review of base closure plans is subject to the expressed interest and requests of representatives of the homeless. Where representatives of the homeless do not express interest in obtaining base property and where HUD is satisfied that the local redevelopment authority's outreach to the representatives of the homeless was in the manner dictated by the Act and regulations, HUD will conclude that a base reuse plan balances in an appropriate manner the needs of community for economic and other redevelopment with the needs of the homeless in the community.

[www.hud.gov](http://www.hud.gov)

[espanol.hud.gov](http://espanol.hud.gov)

Congratulations on your success in carrying out the military base reuse planning process. The Department wishes you continued success in implementing the Donald A. Roush U.S. Army Reserve Center reuse plan. HUD stands ready to assist you in your efforts. If the Department can provide any further service please contact Mr. David H. Long, Community Planning and Development Director, in HUD's Oklahoma City Field Office at 301 NW 6<sup>th</sup> Street, Suite 200, Oklahoma City, Oklahoma 73102. Mr. Long may also be reached at (405) 609-8569.

Sincerely,



Mark Johnston  
Deputy Assistant Secretary  
for Special Needs

cc:  
Mr. Joseph E. Calcara, DASA (I&H)  
Mr. Patrick O'Brien, OEA

---

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# APPENDICES

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**B: Environmental Report**

**C: Resolutions**

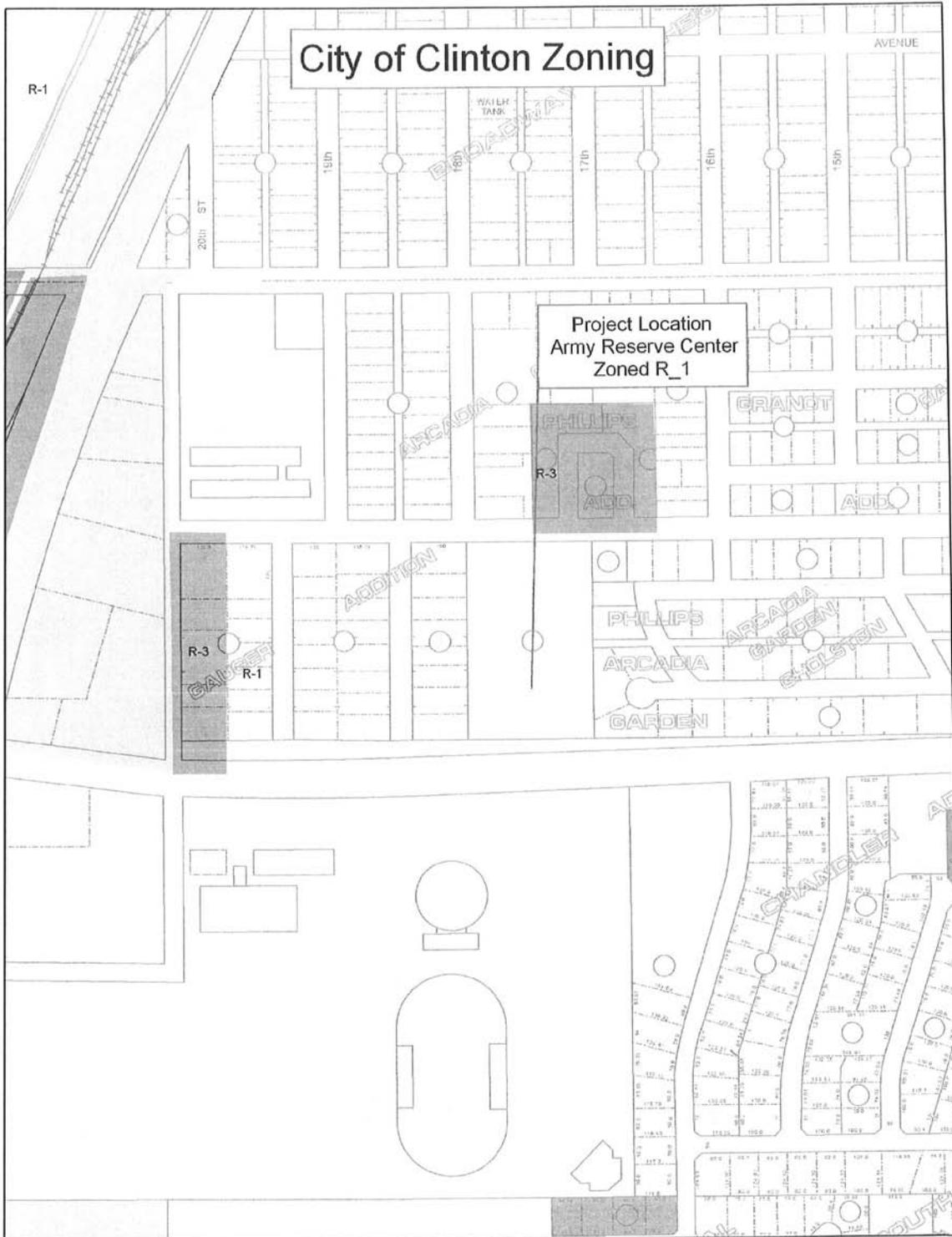
**D: News Articles**

**E: Public Notifications**

**F: Correspondence from Homeless Providers**

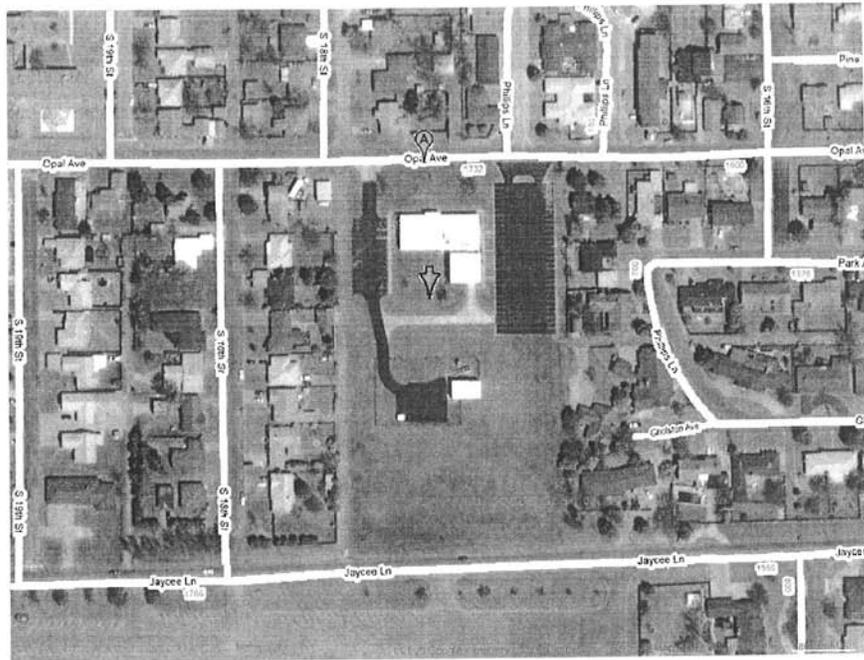
**G: Workshop Sign-In Sheets and Handout**

**H: LRA Meeting Sign-In Sheets**



A-1

Google maps Address

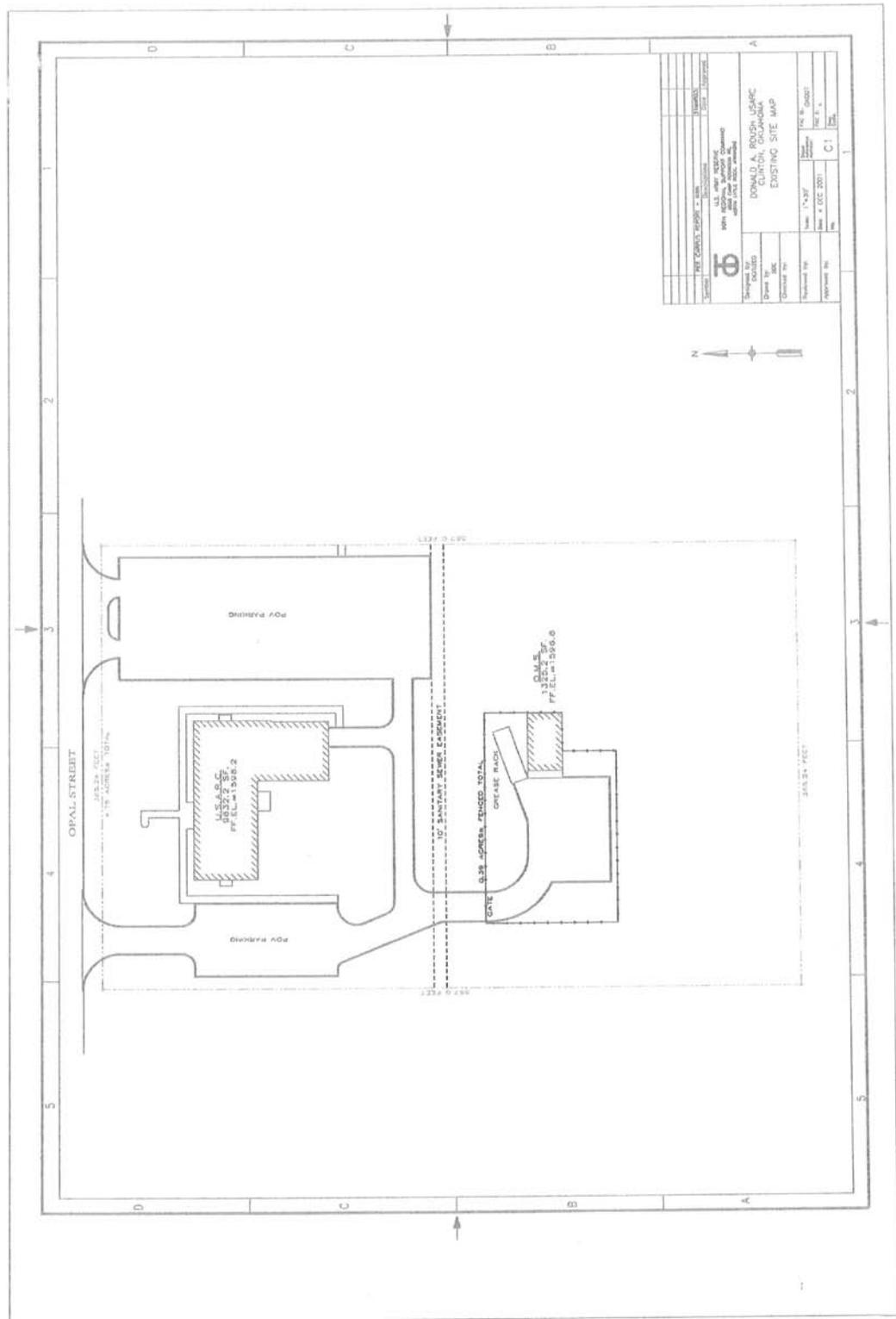


⊕ 35.506343,-98.98... | 1720 opal street, clinton, ok  
GREEN ARROW=USAR site

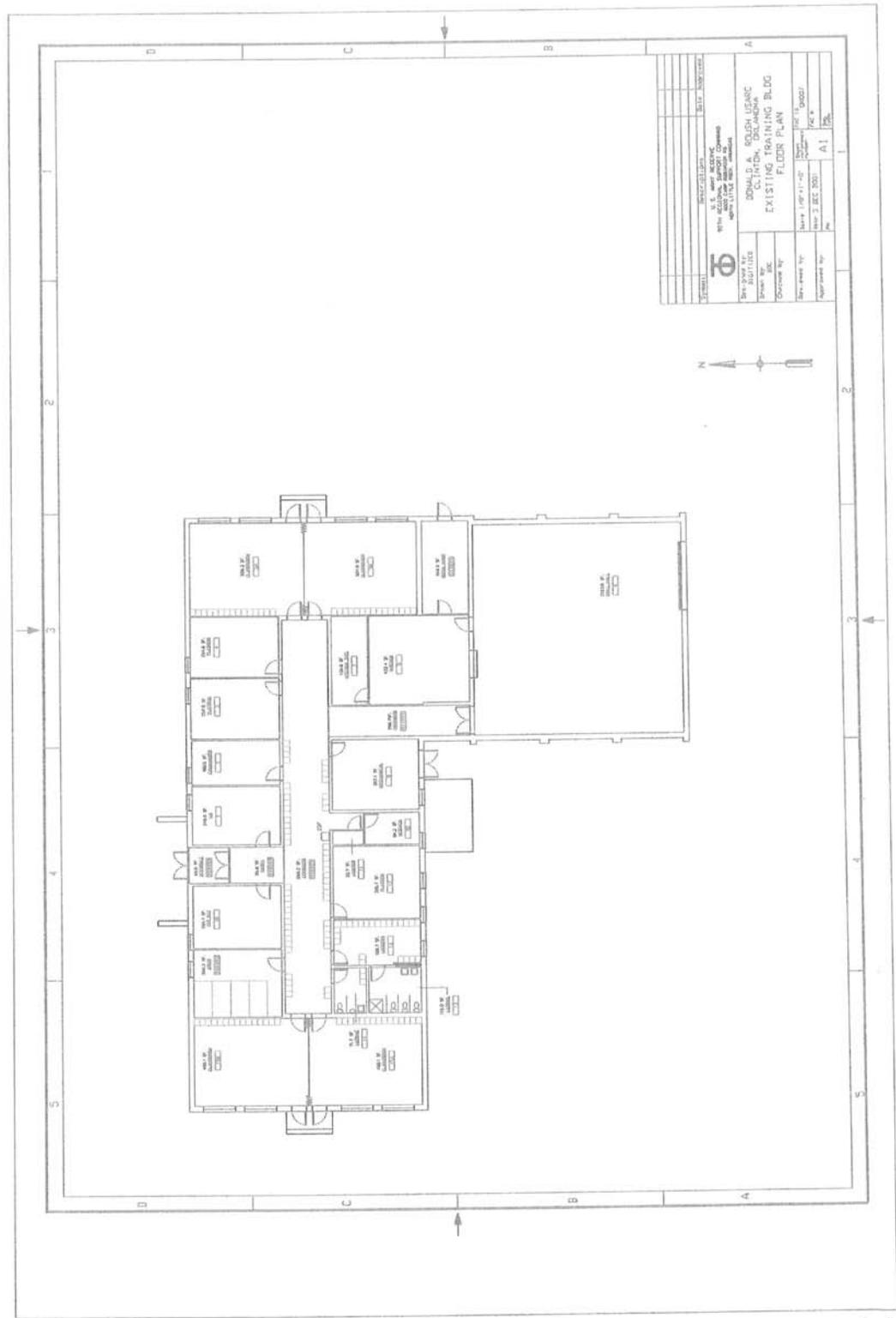
<http://maps.google.com/>

7/14/2009

A-2



A-3



DONALD A. ROUSH USARC EXISTING TRAINING BLDG FLOOR PLAN	
Date: 10/11/05 Drawing No.: 105-11-02	Scale: 1/8" = 1'-0" Project No.: 105-11-02
Checked By: [Signature] Approved By: [Signature]	Date: 10/11/05 Scale: 1/8" = 1'-0" Project No.: 105-11-02

A-4



---

***FINAL***

**ENVIRONMENTAL CONDITION OF  
PROPERTY REPORT**

**DONALD A. ROUSH  
U.S. ARMY RESERVE CENTER (OK007)  
1720 OPAL STREET  
CLINTON, OKLAHOMA 73601**

***Prepared For:***

**U.S. Army Corps of Engineers – Louisville District  
Engineering Division – Environmental Branch  
600 Dr. Martin Luther King, Jr. Place  
Louisville, Kentucky 40202-2232**

**March 23, 2007**

**APPENDIX B**

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### CERTIFICATION

All information/documentation provided accurately reflects the environmental condition of the property. This Environmental Condition of Property (ECP) Report is in general accordance with the U.S. Department of Defense (DoD) requirements for completion of an ECP Report.

---

**JAMES WHEELER II**  
Chief, Environmental Division  
90<sup>th</sup> Regional Readiness Command

---

DATE

The undersigned certifies the contents of this report are in general accordance with DoD policies for the completion of an ECP Report.

---

**LENARD GUNNELL, P.G.**  
Project Geologist  
U.S. Army Corps of Engineers

---

DATE

## EXECUTIVE SUMMARY

The Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers, Louisville District, prepared this Environmental Condition of Property (ECP) Report for the Donald A. Roush U.S. Army Reserve (USAR) Center (Facility ID OK007), hereafter referred to as the "Site" or "USAR Center." The Site is at 1720 Opal Street in Clinton, Custer County, Oklahoma.

This ECP Report was conducted in conformance with primary Department of Defense (DoD) and Army guidance, the DoD's Base Redevelopment and Realignment Manual, DoD 4165.66-M, Army regulations and the American Society for Testing and Materials Designation D 6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys*, as secondary guidance when it was not inconsistent with the primary guidance.

This ECP Report details the history of the property, including the USAR and any prior tenant uses of the Site and the resulting environmental condition of the property.

The USAR Center is on 4.75 acres of land with two permanent structures: a 9,632-square-foot Training Building and a 1,325-square-foot organizational maintenance shop. The USAR Center was closed in 2004 and remains inactive. The last USAR unit based in this USAR Center was the 818<sup>th</sup> Replacement Company. Other units historically based at the Site include the 313<sup>th</sup> Training Brigade Unit, a Drill Sergeant Unit, and a USAR Postal Service Unit.

Based on a review of aerial photographs and U.S. Geological Survey topographical maps dating back to 1940, the Site was a farmed area located on the south side of Clinton, Oklahoma, prior to the 1958 land acquisition by the U.S. government. The USAR Center buildings on the Site were constructed in 1960 and 1961.

Areas of potential environmental concern were reviewed and the TEJV found no significant issues relating to the environmental condition of the property. In accordance with DoD policy defining the classifications (See S.W. Goodman Memorandum dated October 21, 1996), the Site has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

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Appendix C Chain-of-Title Report

Appendix D Previous Environmental Reports and Records of Communication

Appendix E Regulatory Database Search Reports

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### List of Acronyms and Abbreviations

ACM	asbestos-containing material
AEP-PSCO	American Electric Power-Public Service Company of Oklahoma
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
BRRM	Base Redevelopment and Realignment Manual
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CESQG	conditionally exempt small-quantity generator
CFR	Code of Federal Regulations
CORRACTS	Corrective Action Sites
DoD	Department of Defense
EBS	Environmental Baseline Survey
ECCI	Environmental, Compliance & Construction, Inc.
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
ERNS	Emergency Response Notification System
FEMA	Federal Emergency Management Agency
hazmat	hazardous materials
kg	kilogram
LBP	lead-based paint
LQG	large-quantity generator
LUST	leaking underground storage tank
MEP	military equipment parking
NFRAP	No Further Remedial Action Planned
NPL	National Priorities List
OCC	Oklahoma Corporation Commission
OMS	organizational maintenance shop
OWS	oil-water separator

---

Parsons	Parsons Engineering Science, Inc.
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
POV	privately owned vehicle
PWS	Public Water Supply
RCRA	Resource Conservation and Recovery Act
RCRAInfo	RCRA Information
ROTC	Reserve Officer Training Corps
RQ	reportable quantity
RRC	Regional Readiness Command
SQG	small-quantity generator
TEJV	Terraine-EnSafe Joint Venture
TSD	treatment, storage, and disposal
USACE	U.S. Army Corps of Engineers
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USAR	U.S. Army Reserve
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Service
UST	underground storage tank
VWR	vehicle wash rack

## 1.0 INTRODUCTION

The Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers (USACE) Louisville District, was authorized to prepare an Environmental Condition of Property (ECP) Report for the Donald A. Roush U.S. Army Reserve (USAR) Center (Facility ID OK007), in response to the Base Realignment and Closure Act (BRAC) 2005 legislation. The work was performed under Contract No. W912QR-04-D-0044, Delivery Order No. 0008. The facility at 1720 Opal Street, Clinton, Custer County, Oklahoma, is hereafter referred to as the "Site" or "USAR Center." In support of the ECP, a visual reconnaissance of the Site and surrounding area was conducted on July 25 and 26, and August 23, 2006. The purpose of the reconnaissance was to visually obtain information indicating the likelihood of recognized environmental conditions in connection with the Site.

### 1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY

The Military Department with real property accountability shall assess, determine and document the environmental condition of all transferable property in an ECP Report. This ECP Report is based on readily available information. Pursuant to the Department of Defense's (DoD's) policy, set forth in the Base Redevelopment and Realignment Manual (DoD 4165.66-M, March 1, 2006) Section C8.3 (BRRM), the primary purposes of the ECP Report include the following:

- Provide the Army with information it may use to make disposal decisions.
- Provide the public with information relative to the environmental condition of the property.
- Assist in community planning for the reuse of BRAC property.
- Assist federal agencies during the property screening process.
- Provide information for prospective buyers.
- Assist prospective new owners in meeting the requirements under U.S. Environmental Protection Agency's (USEPA) "All Appropriate Inquiry" regulations.
- Provide information about completed remedial and corrective actions at the property.
- Assist in determining appropriate responsibilities, asset valuation, and liabilities with other parties to a transaction.

The ECP Report contains the information required to comply with the provisions of 40 Code of Federal Regulations (CFR) Part 373, which require that a notice accompany contracts for the sale of, and deeds entered into, for the transfer of federal property on which any hazardous substance was stored, released or disposed of. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 120(h) stipulates that a notice is required if certain quantities of designated hazardous substances have been stored on the property for one year or more — specifically, quantities exceeding 1,000 kilograms (kg) or the reportable quantity (RQ), whichever is greater, of the substances specified in 40 CFR 302.4 or one kg of acutely hazardous waste as defined in 40 CFR 261.30. A notice is also required if hazardous substances have been disposed of or released on the property in an amount greater than or equal to the RQ. Army Regulation 200-1 requires that the ECP Report address asbestos, lead-based paint (LBP), radon and other substances potentially hazardous to human health.

This ECP Report used the American Society for Testing and Materials (ASTM) Designation D 6008-96 (2005) *Standard Practice for Conducting Environmental Baseline Surveys* as a guideline when not inconsistent with the BRRM, CERCLA § 120, Army regulations and other applicable Army guidance.

## 1.2 SCOPE OF SERVICES

This ECP Report covers the 4.75-acre Donald A. Roush USAR Center at 1720 Opal Street in Clinton, Oklahoma. The property is bounded by Opal Street and a residential area to the north, 18<sup>th</sup> Street and a residential area to the west, Jaycee Street and Clinton High School to the south, and a residential area to the east. A general Site location map, Site map, flood plain map, wetlands map, and historical topographic maps and aerial photographs are provided in Appendix A. Appendix B provides photographs taken during the July and August 2006 Site reconnaissance. Appendix C provides chain-of-title information. Historical environmental documents and reports, and records of communication are provided in Appendix D. The environmental database report is provided in Appendix E.

This ECP Report classifies the property into one of seven DoD Environmental ECP categories as defined by the S.W. Goodman Memorandum dated October 21, 1996. The property classification categories are as follows:

- Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent properties).
- Category 2: Areas where only release or disposal of petroleum products has occurred.
- Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.

- Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment has been taken.
- Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.
- Category 6: Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
- Category 7: Areas that are not evaluated or require additional evaluation.

### 1.3 ASSUMPTIONS AND LIMITATIONS

This report was prepared to permit formulation of an opinion of the environmental condition of the property. Opinions on the environmental conditions at the Site are based on information from the Site reconnaissance, interviews, and collection and review of readily available information. New information or changes in property use could require a review and possible modification of the findings and conclusions contained in this report.

The information obtained from the USAR, the USAR's representatives, individuals interviewed and prior environmental reports was considered to be accurate unless reasonable inquiries indicated otherwise. Conditions observed were considered representative of areas that were not accessible unless otherwise indicated.

This ECP Report presents a summary of readily available information on the environmental conditions of, and concerns relative to, the land, facilities, and real property assets at the Donald A. Roush USAR Center. Its findings are based on a record search of readily available, a thorough review of the applicable and relevant documents, a visual reconnaissance conducted on July 25 and 26, and August 23, 2006, and interviews with personnel knowledgeable about the Site and its history. Extensive environmental investigations and reports and Site historical documents were reviewed in support of this ECP. Information obtained from these other studies is reflected within this report by reference. A complete list of references is provided as Section 9.0.

All Site buildings were visually inspected during the Site reconnaissance. However, a 100% visual reconnaissance of each building (e.g., attics, crawl spaces, etc.) was not practical due to accessibility restrictions. No sampling or analysis of any media was conducted during this survey.

## 2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

The visual Site reconnaissance involving a walking tour of the facility, including the Training Building and organizational maintenance shop (OMS), and its perimeter was conducted by TEJV personnel on July 25 and 26, and August 23, 2006, to field-verify information produced in the document review and to identify recognized environmental conditions of property.

A visual reconnaissance of the Site perimeter was conducted to evaluate adjacent property uses that could cause environmental contamination on the Site. TEJV personnel drove on roads along the perimeter and in the surrounding area to visually identify any contiguous properties that appear, in TEJV's professional judgment, to have contamination that could migrate to the Site. The findings of the perimeter survey are presented in Section 4.0.

### 2.1 SITE LOCATION

The Site is at 1720 Opal Street in Clinton, Custer County, Oklahoma (Figure 1 in Appendix A). The Site is in a developed area in the southwest area of Clinton. It is bordered by residential areas to the west, north, and east, and the Clinton High School campus to the south.

### 2.2 ASSET INFORMATION

Facility Name and Address: Donald A. Roush USAR Center (OK007)  
1720 Opal Street  
Clinton, OK 73601

Property Owner: U.S. Government

Date of Ownership: June 13, 1958

Current Occupant: Unoccupied (818<sup>th</sup> Replacement Company was the last unit to occupy the Site. The facility was vacated in September/October 2004)

Zoning: R-1, Single Family Residential

County, State: Custer County, OK

USGS Quadrangle: Clinton, OK

Section/Township/Range: Section 22, Township 12 North, Range 17 West

Latitude/Longitude: 35° 38' 24.5" N; 98° 58' 54.8" W

PAGE 4

**Legal Description:** All those certain pieces or parcels of land being Block 12, Arcadia Garden, Subdivision of the North ½ of the Northeast ¼ of Section 22, Township 12 North, Range 17 West, the area described is designated as Tract Number A-100, Army Reserve Training Center, lying and situated in the City of Clinton, Custer County, State of OK.

### 2.3 PHYSICAL DESCRIPTION

A Site map of the USAR Center is provided in Figure 2 in Appendix A. Photographs of the Site and surrounding area are presented in Appendix B. Photographs 1 through 10 show the general layout of the Site and buildings. Photographs 11 through 17 show specific rooms and conditions within the Training Building. Photographs 18 through 26 illustrate specific features in the military equipment parking (MEP) area and OMS. Photographs 27 through 32 show the land use of property adjacent to the Site.

The USAR Center is on 4.75 acres of land with two permanent structures: a 9,632-square-foot Training Building and the 1,325-square-foot OMS. Initial construction of the Training Building occurred in 1960, and construction of the OMS occurred in 1961. Modifications made to the Training Building in 1985 included expansion of the building to the east and addition of the Drill Hall. The Training Building walls are concrete block with brick veneer, and the OMS walls are concrete block. Both buildings have concrete foundations. The general layout of the Site relative to the Training Building is shown on Photographs 1 through 5 in Appendix B. The general layout of the Site relative to the OMS is shown on Photographs 6, 7, and 8 in Appendix B.

A Site map of the USAR Center is provided in Figure 2 in Appendix A. As shown on that figure, vehicle access to the Site is via two driveways from Opal Street to the north. The driveways connect to two privately owned vehicle (POV) parking areas on opposite sides of the Training Building — the west POV parking area and the east POV parking area. These two POV parking areas are connected by a paved road south of the Training Building. A paved driveway extends from this paved road to the roll-up door in the Drill Hall of the Training Building. An MEP area, which is connected by a paved road to the west POV parking area, is located west of the OMS. The OMS and MEP are enclosed by a gated chain-link security fence topped with barbed wire. A grease rack ramp is located north of the OMS, within the fenced area.

Two hazardous materials (hazmat) storage sheds were within the OMS fenced area during the July 2006 Site reconnaissance — the “old” hazmat storage shed and the “new” hazmat storage shed. Neither shed contained hazmat during the July 2006 reconnaissance. The old shed was previously used to store hazmat to support vehicle maintenance and cleaning activities. The new shed was never used; the shelves were lying on its floor during the July 2006 Site reconnaissance. The new shed was not on the Site during the August 2006 Site reconnaissance; the USAR had moved it offsite for use at another location.

As shown on Figure 2 in Appendix A, approximately one-third of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by lawn area; there are landscaped shrubs immediately adjacent to the Training Building. There are two deciduous trees that are taller than forty feet in the area of the Training Building (Photographs 3, 4 and 5 in Appendix B). The lawn area on the south side of the Site is shown on Photographs 9 and 10 in Appendix B.

Topographically, the Site is relatively flat. No signs of erosion, excavation, or fill were observed on the Site. According to interviews with USAR personnel, soil or fill material from offsite sources has not been brought onto the Site, nor has any significant regrading occurred on the Site.

The original Training Building consisted of a one-story, rectangular shaped structure. In 1985, a new meeting room was added on the east side of the building and the Drill Hall and kitchen area were added to the south, making the building footprint "L"-shaped. The Training Building includes classrooms, restrooms, offices, a Drill Hall, an arms storage room, a kitchen, and mechanical room. The interior of the building appeared to be well maintained during the visual reconnaissance. No evidence of chemical or petroleum releases was observed inside the building.

The Drill Hall has a vehicle roll-up door on the south side that opens onto a driveway. The Drill Hall was used for troop assemblies and storage. During the Site reconnaissance, some members of the local high school Reserve Officers Training Corps (ROTC) and their adult instructors were target shooting inside the Drill Hall. The practice drill used pellet guns and temporary targets. Temporary targets were lined up against the west wall of the Drill Hall (Appendix B, Photograph 11). The targets were 2-inch by 4-inch wooden frames with a thin (approximately one-eighth inch) piece of plywood on the front and a lead/metal back. The lead pellets went through the plywood, and were stopped by the lead/metal back and dropped to the bottom of the frame. The lead pellets were contained in the frames and did not present a potential lead contamination issue. The arms storage room with storage racks and a locking cabinet located on the northwest area of the Training Building (Appendix B, Photograph 12) is currently used to store the ROTC pellet guns. USAR personnel said that no live ammunition was ever stored on the Site and that there were no other firing range activities that may have resulted in lead contamination of the Site.

The kitchen area consists of three rooms. Each has a floor drain that discharges to the public sanitary sewer. Kitchen equipment, including a large refrigerator, freezer, and stoves, was present during the Site reconnaissance. USAR personnel said that the kitchen had not been used since the 1980s. Small quantities of cleaning chemicals were stored in the janitor's closet and on a cleaning cart observed inside the kitchen (Appendix B, Photograph 13). A metal lid-covered grease trap, utilized when the kitchen was in operation, is located outside the eastern wall of the Training Building. A concrete wash basin equipped with a floor drain is located adjacent to the grease trap, next to the building. The grease trap and wash basin are shown in Appendix B, Photograph 14.

The mechanical room located within the west-central portion of the building contains the heating, ventilating, and air-conditioning system, hot water heaters, chillers, and the fire prevention system equipment. The room is equipped with floor drains to convey the condensate/blowdown/leakage from the various pieces of mechanical equipment to the public sewer system. Two floor drains and some equipment and piping in the mechanical room are shown on Photographs 15, 16, and 17 in Appendix B.

The condensate/blowdown/leakage is piped directly from the equipment to a floor drain to prevent water from accumulating on the floor. Floor drains are also located in the restrooms and in the kitchen to collect condensate from the chillers/refrigerators and to facilitate floor cleaning. The floor drains discharge into the public sanitary sewer that serves the Site.

Electric power to the Site is provided by overhead lines from American Electric Power-Public Service Company of Oklahoma (AEP-PSCO). There are two pole-mounted electrical transformers on the east and west sides of the Site (Appendix B, Photograph 18).

The OMS is a one-story, rectangular structure adjacent to the MEP area within the chain-link security fencing south of the Training Building. A grease rack ramp, old hazmat shed, and the former vehicle wash rack (VWR) area are located within the fenced MEP parking area (Appendix B, Photographs 19 and 20). A single roll-up garage door on the west side of the OMS opens onto the MEP area. The OMS has two pedestrian doors: one on the west side of the south wall and one on the east side of the north wall. Two windows are located in the north wall and one in the east wall. The OMS has a bare concrete floor and concrete block walls, and was empty during the July 2006 Site reconnaissance (Appendix B, Photograph 21). An overhead heater and insulated piping in the OMS are shown on Photograph 22 in Appendix B.

The grease rack ramp located just north of the OMS and the exterior of the old hazmat shed are shown on Photograph 23 in Appendix B. Storage racks that were removed from the OMS were being stored under the grease rack ramp during the July 2006 Site reconnaissance. The empty interior of the old hazmat storage shed is shown on Photograph 24 in Appendix B. The location of the former VWR and oil-water separator (OWS) is shown on Photographs 25 and 26 in Appendix B. The VWR and OWS were removed in 1993 and the area is now covered in grass with no visible evidence of either feature. A description of the removal work is presented in Section 3.3.1 of this ECP Report.

No military vehicles were located within the MEP area or onsite during the visual reconnaissance.

Activities historically conducted at the Site may have been different or included other activities than those observed on the Site during the visual reconnaissance and/or described by current USAR personnel.

## 2.4 SITE HYDROLOGY AND GEOLOGY

### 2.4.1 Surface Water Characteristics

Appendix A provides a topographic map of the Site and surrounding area. As shown on the map, the Site is fairly flat and approximately 1,600 feet above mean sea level. The north end of the Site drains toward Opal Street to the north and to the east. As shown in the Site photographs, the east POV parking area is lower in elevation than the west POV parking area. The southern half of the Site generally slopes to the southeast. A shallow drainage swale curves through the south lawn area of the Site from the OMS area to the southeast corner of the Site. No surface water bodies are present on the Site or adjacent areas. The Washita River, located approximately 1.5 miles east of the Site, is the nearest major surface water feature to the Site. The Washita River ultimately discharges into the Red River.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the City of Clinton, Oklahoma (Community-Panel Number 400054 0005 D, Map revised April 3, 1987), the Site is in Zone C. FEMA defines Zone C as "areas of minimal flooding." The Site is outside the 100-year and 500-year flood zones. Figure 3 in Appendix A provides a map depicting the extents of the nearest 100-year and 500-year flood plains in the area of the Site.

### 2.4.2 Hydrogeological Characteristics

Based on the Custer County soils map from the U.S. Department of Agriculture Natural Resource Conservation Service, the predominant soil types on the Site are:

- CaB — Carey silt loam
- WoD — Woodward silt loam

The runoff class for Carey silt loam is low and it is well drained. The runoff class for Woodward silt loam is medium; it is also well drained. Both soils are not flooded and not ponded and are classified as Hydrologic Group Class B, which is categorized as having deep and moderately deep, moderately well and well-drained soils with moderately coarse textures. Carey silt loam and Woodward silt loam are not hydric soils. There are no wetlands on the Site according to Figure 4 in Appendix A, which is a copy of the National Wetlands Inventory Map of the Site area.

The Site is located approximately two blocks from the City Of Clinton water tank and is near a topographic high point in the area. The Site and surrounding area are served with public water by the City of Clinton.

No wells or springs were observed on the Site, nor were any wells identified on the Site during a search of the U.S. Geological Survey (USGS), Federal Reporting Data System Public Water Supply (PWS) System, and state databases. A search was also conducted

for wells within 1 mile of the Site (see the Environmental Data Resources, Inc. [EDR] Report in Appendix E).

No PWS wells within 1 mile were listed on the databases researched by EDR. One Federal USGS well and 22 other wells within 1 mile were listed on databases researched. The Federal USGS well was reported to be within one-half mile of the Site. TEJV attempted to physically locate the well in the field during the July 2006 Site reconnaissance but was unsuccessful.

The other 22 wells were reportedly greater than one-quarter, but less than, 1 mile from the Site. The wells were reportedly shallow (typically 12 to 25 feet deep) and primarily used for water quality or site assessment. The TEJV attempted to physically locate these wells in the field during the July 2006 Site reconnaissance. Only two groundwater monitoring wells were observed in the field; these wells were located north of the closed Coca-Cola facility on Corbin Lane more than one-quarter mile from the Site. Other listed wells were not located in the field. The two observed wells are not located upgradient from the Site and do not represent conditions that will present a potential risk to the Site.

## **2.5 SITE UTILITIES**

The Site and surrounding area are served by public utilities. The City of Clinton provides potable water and sanitary sewer service. Oklahoma Natural Gas Company provides natural gas service to the Site. AEP-PSCO provides electricity to the Site. Solid waste disposal takes place in the Custer County Landfill by municipal service.

## **2.6 WATER SUPPLY WELLS AND SEPTIC SYSTEMS**

As described in Section 2.4.2, there are no PWS wells within 1 mile of the Site. Because the Site is served by a public sanitary sewer system, there are no septic systems on the Site, and no known systems were identified in the area.

### 3.0 SITE HISTORY

#### 3.1 HISTORY OF OWNERSHIP

Land titles for the Site were reviewed back to 1892. Appendix C contains a historical Chain-of-Title Report completed for the Site. Key historical deed transfers of the Site are as follows:

- May 20, 1892 — United States of America to Alice Butts
- December 23, 1907 — Alice Butts to C. H. Lamb and Chas W. Goodwin
- January 7, 1908 — Chas W. Goodwin and Carrie Goodwin, husband and wife; and C. H. Lamb to The Clinton Townsite and Investment Company
- March 4, 1922 — The Clinton Townsite and Investment Company to C. E. Johnson
- June 13, 1958 — Josephine Havens Chody and husband, Byron Chody, Billie Jo Arnold and husband, James E. Arnold (heirs of C. E. Johnson) to United States of America

The Chain-of-Title Report did not identify any leases or environmental liens against the USAR Center property. No historical Sanborn fire insurance maps were available for this Site.

As shown on the Site map (Figure 2 in Appendix A), there is a 10-foot-wide sanitary sewer easement that runs east-west near the center area of the Site.

#### 3.2 PAST USES AND OPERATIONS

Important events in the facility's development, administration, and mission are summarized below:

<b>Year</b>	<b>Description</b>
1958	Site property was acquired by the U.S. government
1960	Training Building was constructed, along with a POV parking area to the west
1961	OMS was constructed
1985	Training Building was expanded to the east, and Drill Hall and kitchen were added
1985	East POV parking areas was added
2004	Facility closed as an active USAR Center

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Historical information sources suggest that the Site was previously part of a farm on the south side of Clinton, Oklahoma. The Site has served as a USAR Center since the U.S. government acquired the land in 1958.

The Site primarily functioned as an administrative and educational facility, with limited maintenance of military vehicles. The Site was historically used by reservists for drill activities on various weekends throughout the year. The USAR Center was closed in 2004 and remains inactive. The last USAR unit based in this USAR Center was the 818<sup>th</sup> Replacement Company. Other units historically based at the Site prior to the 818<sup>th</sup> Replacement Company included the 313<sup>th</sup> Training Brigade Unit, a Drill Sergeant Unit, and USAR Postal Service Unit.

During the Site reconnaissance, the Training Building was unoccupied except for high school ROTC training being performed in the Drill Hall. The Training Building contained tables, chairs, desks, and the kitchen equipment from previous USAR activities. However, the kitchen had not been used since the 1980s.

The OMS was also empty at the time of the Site reconnaissance. Storage racks formerly located in the OMS had been removed and stockpiled under the grease rack ramp outside the OMS. According to a USAR representative, the USAR units stationed at the Site did not have many government vehicles, and vehicle maintenance and repair work was primarily performed at an Area Maintenance Support Activity shop located at one of the other USAR centers in Oklahoma. As described in Section 3.5.2, a VWR with an OWS was shown on a figure in a previous architectural report. During the July 2006 Site reconnaissance, the area was covered with grass and there were no visible signs of the VWR or OWS. As described in Section 3.3.1, the VWR and OWS were reportedly removed in 1993, although no closure reports were made available for review.

Historical topographic maps and aerial photographs provide information about the Site and surrounding area. Figures 5 and 6 in Appendix A present topographical maps of the Site and surrounding area dated 1956/1957 and 1983, respectively. Figures 7 through 11 present aerial photographs of the Site and surrounding areas dated 1940, 1955, 1966, 1995, and 2006, respectively.

Pertinent observations on the historical USGS maps are summarized below.

- **1956/1957 (Figure 5).** The Site is located just south of the developed area of Clinton. One building is shown on the northwest corner of the Site; it may have been a farm house for the Site and surrounding area. The area immediately north of Opal Street is shown as developed. Houses are shown west of the Site on the other side of what is now 18<sup>th</sup> Street. The south side of the Site is bounded by the Panhandle and Santa Fe railroad track; the area farther south appears to be farm land. The area east of the Site between the developed area of Clinton and the railroad track also appears to be farm land or undeveloped. The City of Clinton is

shown to the north and west of the Site. Route 66 is shown through downtown Clinton and then east and south of the Site.

- **1983 (Figure 6).** The Site is shown as part of the developed area of Clinton; no specific buildings and residences are shown on the Site or in the immediate area. The area east and southeast of the Site is shown as developed; the area to the east is shown as McLain Rogers Park. The west side of the Site is bordered by 18<sup>th</sup> Street. The railroad tracks south of the Site were replaced by Jaycee Lane. Clinton High School is shown south of the Site and Jaycee Lane. More development is shown north and west of the Site. A new road is shown along the railroad tracks to the west. Interstate 40 is also shown south of the Site.

Pertinent observations on the historical aerial photographs are summarized below.

- **1940 (Figure 7).** A building assumed to be a farm house is shown in the northwest corner of the Site. The Site appears to be in a farmed/cleared area on the south side of Clinton. Residential development is visible north of the Site, within the town of Clinton. The density of houses is higher in the town of Clinton to the north. Opal Street is shown on the north side of the Site and railroad tracks are shown to the south. There are no cross streets and only two buildings are present in the area between Opal Street and the railroad tracks. A drainage swale appears to discharge away from the northeast corner of the Site to the southeast. The area to the south appears to be farm land.
- **1955 (Figure 8).** The building in the northwest corner of the Site remains. More houses and buildings are shown in Clinton north of the Site. Some cross streets and other roads are present between Opal Street to north side and the railroad tracks to the south. The area to the south appears to be farm land.
- **1966 (Figure 9).** The USAR Center buildings are shown on the Site. The main part of the Training Building, OMS, and west POV parking area are shown. The pad for the VWR (mentioned in the Architectural Report) is visible north of the MEP area. The areas north, west, and east of the Site are fully developed residentially. The railroad to the south has been replaced by Jaycee Lane.
- **1995 (Figure 10).** The USAR Center buildings and additions are shown on the Site. The Training Building has been expanded to the east and the Drill Hall added to the south. The east POV parking area and the road that connects the east and west POV parking areas are shown. A driveway from this connector road to the Drill Hall door is also shown. The pad for the VWR is not visible. More residential development is visible southeast of the Site.
- **2006 (Figure 11).** The USAR Center shown on the Site appears similar to the 1995 conditions. The area around the Site is fully developed.

The earliest available information about the Site is from a 1940 aerial photograph, which shows the Site as a farming operation. As documented in the topographic maps and aerial photographs presented in Appendix A, a structure (possibly a house) was located on the northwest corner of the Site. No other records were found regarding this structure. This structure was removed prior to development of the USAR Center on the Site.

### **3.3 PAST USE, STORAGE, DISPOSAL, AND RELEASE OF HAZARDOUS SUBSTANCES**

#### **3.3.1 Past Use and Storage of Hazardous Substances**

Information related to the past use and storage of hazardous substances at the Site was compiled through review of available Site records, search of federal and state environmental databases, and interviews with AR personnel.

Chemicals formerly used and stored at the Site were associated with limited vehicle maintenance, facility maintenance activities, and janitorial services. Hazardous substances were stored in the hazmat shed in the OMS fenced area. However, there is no evidence that CERCLA hazardous substances were stored at the Site for one year or more in excess of their corresponding RQs.

The 1998 Historical Architectural Report contained a map dated August 28, 1989 that showed a "1 - Vehicle Wash Rack with Oil/Water Separator" on the north side of the MEP within the OMS fenced area. The OMS was labeled as a "Supply Warehouse" on the same figure. A yard hydrant/hose bib and associated bollard were observed in this area during the Site reconnaissance; however, the area was a grass lawn and there were no signs of the former VWR or OWS. USAR personnel provided general information about the VWR and associated OWS via interview. The OWS was reported to be a "rectangular shaped structure," approximately 4 feet wide by 6 feet long and 2 feet deep; contained baffles to separate, collect, and hold oil and grease; and did not have a separate tank to store oil and grease. Oil accumulated in the OWS was cleaned out manually. Water from the OWS discharged directly to the sanitary sewer. The OWS was not required to be registered with the state of Oklahoma when it was operational.

The VWR and OWS were removed by a contractor in 1993 (Work Order # 2P00-23P - Project # 2P00023P). The contract required that all contaminated soils in and around the OWS "be removed and fresh fill materials placed, compacted and revegetated." USAR personnel could not locate a closure report, but stated that the cleanup was completed in accordance with the contract requirements and environmental regulations applicable at that time. If contaminated soil was encountered during the removal work, it reportedly would have been removed; however, there is no record that contaminated soil was encountered. According to USAR personnel, this type of removal work did not require a closure report because the OWS was not registered.

### 3.3.2 Past Disposal and Release of Hazardous Substances

Information related to past disposal and release of hazardous substances at the Site was compiled through review of available Site records, search of federal and state environmental databases, and interviews with USAR personnel. According to USAR personnel and Site records, there is no evidence that hazardous substances above RQs were released or disposed at the Site. No stained soil or stressed vegetation was observed during the visual reconnaissance. Additionally, the MEP and POV parking areas did not show any signs of staining, and no noxious or foul odors were noted during the visual reconnaissance.

### 3.4 PAST BULK PETROLEUM STORAGE TANKS

Based upon a review of available Site records, a search of federal and state environmental databases, and interviews with USAR personnel, it does not appear that bulk petroleum aboveground storage tanks (ASTs) and/or underground storage tanks (USTs) were previously located on the Site.

### 3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

A review of Site records produced several reports pertaining to the Site. The following subsections provide a brief summary of these reports. Copies of the reports, unless otherwise specified, are provided in Appendix D. Only pertinent sections of reports that addressed multiple sites are presented in Appendix D.

#### 3.5.1 Environmental Baseline Survey

An Environmental Baseline Survey (EBS) was completed in 2004 for the Site for the USAR, 90<sup>th</sup> Regional Readiness Command (RRC). Environmental, Compliance & Construction, Inc. (ECCI) issued an *Environmental Baseline Survey for Disposal of Donald A. Roush United States Army Reserve Center* in November 2004. The EBS provides summary and general information about the Site. In accordance with the ASTM Standard D 5746-98 for "Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities", ECCI classified the Site as an ECP Area Type 1 Property.

#### 3.5.2 Architectural Assessment

Parsons Engineering Science, Inc. (Parsons) performed a *Historic Architectural Resources Assessment of the 90<sup>th</sup> Regional Support Command Facilities in Oklahoma* for the Department of the Army, 90<sup>th</sup> RRC, Office of the Engineer. The findings of the assessment were compiled in a report issued February 1998. The report concluded that the buildings on the Site were not eligible for placement on the National Registry of Historic Places because they did not meet the 50-year age criteria and they did not appear to possess exceptional historical importance. No further architectural surveys were recommended for this Site until 2011. The Oklahoma State Historic Preservation Officer concurred with the

report recommendations in a letter dated February 2, 1998. A copy of the letter is included with applicable pages from the report in Appendix D of this ECP Report.

### 3.5.3 Lead-Based Paint

ETC Engineers, Inc. of Little Rock, Arkansas, performed a LBP survey of the USAR Center for the USACE Little Rock District. The results were summarized in a *Report of Findings, Lead-Based Paint and Ozone Depleting Chemicals Assessment and Management, Roush USARC, Clinton, Oklahoma*, issued January 1994. The report stated that the date of construction for the USAR Center buildings was 1960, an addition occurred in 1961, and a new roof was added in 1992.

The report stated that LBP was detected at nine locations in the USAR Center, including door jambs, pipe bollard, edge guard, grease rack, and walls.

### 3.5.4 Radon

Per a memo on September 28, 1993, the Department of the Army, Headquarters 122D USAR Command issued copies of radon screening results as of January 13, 1993, for the USAR Center. The radon screening tests were performed at six locations in the Training Building. All results were "1.0 or less" picocuries per liter (pCi/L).

### 3.5.5 Asbestos

Two asbestos surveys and inspections were performed at the USAR Center. The first asbestos survey reported that non-friable and friable asbestos-containing material (ACM) were detected on the Site as of January 22, 1993. The positive asbestos analytical results from that survey are summarized in Table 2.

Building	Location	Material	ACM Type	Quantity (in square feet)
Training Building	West Classroom	Floor tile	non-friable	5,043
Training Building	West Classroom	Mastic	non-friable	5,043
Training Building	Above ceiling in west end hall and center hall	MJP insulation above ceiling	friable	43
Supply Building (assumed to be OMS)	Vibration joint	Vibration joint	friable	4

An asbestos inspection was performed at the USAR Center in February 1997 by the Environmental Section of the 90<sup>th</sup> RRC, USAR in Little Rock, Arkansas. The results were

summarized in *Asbestos Building Inspection, Donald A. Roush U.S. Army Reserve Center, Clinton, Oklahoma*, issued February 1997. As part of the inspection, eight samples were collected for asbestos analysis. A sample of the floor tile mastic in the west classroom tested positive for asbestos. The report stated that the non-friable floor tile mastic "may be disturbed during demolition projects and removal could become necessary to prevent asbestos exposure" and "Two flexible duct connectors found in the maintenance shop were assumed to be asbestos." The report stated that these connectors could be damaged "due to the moderate potential for air erosion." The report also stated that "the maintenance shop is seldom occupied." The term "maintenance shop" in the reports has been interpreted to be the OMS for the purposes of this ECP Report.

According to interviews with USAR personnel, ACM within the USAR Center was removed. The work was performed between 1998 and 2000. USAR personnel were not able to locate specific documentation or reports describing the work and/or when it was performed.

### 3.5.6 Threatened and Endangered Species

Parsons performed an investigation and issued a *Final Phase 2 Threatened and Endangered Species Habitat Analysis of the 90<sup>th</sup> Regional Readiness Command (RRC) Facilities* for the Department of the Army, 90<sup>th</sup> RRC in August 2005. The Phase 2 analysis was performed on the USAR Center due to a recorded observation of the Texas Horned Lizard in 1995. The report listed the following federal and state-listed threatened and endangered species in Custer County:

- American Peregrine Falcon (*Falco peregrinus anatum*)
- Bald eagle (*Haliaeetus leucocephalus*)
- Black-Tailed Prairie Dog (*Cynomys ludovicianus*)
- Interior least tern (*Sterna Antillarum*)
- Whooping Crane (*Grus americana*)
- Texas Horned Lizard (*Phrynosoma cornutum*)

The Texas Horned Lizard is a state-listed species; all of the others are contained in both state and federal lists. The report concluded that the Donald A. Roush USAR Center did not contain habitat for threatened and endangered species, including the Texas Horned Lizard.

### 3.5.7 Cultural Resources

Parsons performed an assessment and prepared a *Management Summary, Cultural Resources Assessment of 90<sup>th</sup> Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma and Texas* for the Department of the Army, 90<sup>th</sup> RRC. The assessments were compiled and issued in February 1998. The assessments concluded that there were no architectural or archeological issues at the Donald A. Roush USAR Site. The Site has a "low" archeological potential and is not eligible for the National Registry of Historical Places. The Oklahoma State Historic Preservation Officer concurred

with the report recommendations in a letter dated February 2, 1998. The Oklahoma State Archeologist concurred with the recommendations in the draft report for the USAR Center in a letter dated July 14, 1997.

### 3.5.8 Polychlorinated Biphenyls

The U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) performed *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97* for the 90<sup>th</sup> RRC facilities in Arkansas, Louisiana, Oklahoma, New Mexico, and Texas. The assessments were compiled and issued on September 30, 1997. The assessment addressed the two pole-mounted transformers west of the Site on the west side of 18<sup>th</sup> Street (Appendix B, Photograph 18) and fluorescent lighting in the Training Building. The transformers were reported to be owned by PSCO; their manufacturer and age were listed as unknown. The PCB status of one of the transformers was reported to be "Non-PCB," and the PCB status of the other one was reported as "Unknown." The transformer identified as Non-PCB was listed in "Fair" condition with "some rust." The transformer with unknown PCB status was listed in "Good" condition with "no leaks." The fluorescent lighting fixtures in the USAR Center were identified as "Non-PCB ballast" in the USACHPPM report.

#### 4.0 ADJACENT PROPERTIES

Figure 11 in Appendix A provides a 2006 aerial view of the Site and adjacent properties. The Site is bounded by Opal Street to the north, 18<sup>th</sup> Street to the west, and Jaycee Lane to the south. The backyards of multiple single-family houses are adjacent to the Site on the east. The Site is located in a primarily residential area. Clinton High School is on the south side of Jaycee Lane; the campus includes the high school, the Tornado Dome (an indoor arena), athletic fields, and parking lots. Table 3 provides a list of adjacent properties with their directional location from the Site and zoning. Photographs 27 through 32 in Appendix B present views of adjacent properties and surrounding land use.

Direction From Site	Name/Type of Property	Addresses	Zoning
North	Residential property on the north side of Opal Street. Primarily single family, some multifamily to the northeast.	1600 and 1700 blocks of Opal Street	Primarily R-1, Single-Family Residential, some R-3 Multifamily Residential
West	Residential property on the west side of 18th Street. Single Family.	700 block of 18th Street	R-1, Single-Family Residential
South	Clinton High School	Jaycee Lane and Corbin Lane	R-1, Single-Family Residential
East	Residential property on the west side of 18th Street. Single Family	Philips Lane, Park Avenue, Opal Street, and Gholson Avenue	R-1, Single-Family Residential

Appendix A provides historical aerial photographs and topographic maps. Appendix E presents an environmental data report that was used to evaluate potential environmental impacts from adjacent and nearby properties that may have also impacted the environmental conditions at the Site. Land use at the adjacent properties does not appear to have changed significantly over the years and does not appear to have impacted the environmental conditions of the USAR Center.

## 5.0 REVIEW OF REGULATORY INFORMATION

A component of the ECP is the review of all reasonably obtainable federal, state, and local government records for the Site and surrounding properties where there has been a release or likely release of any hazardous substance or petroleum product that are likely to cause a release or threatened release of any hazardous substance or petroleum product on the federal real property. An environmental database summary was acquired from EDR on July 13, 2006. The environmental database summary consolidates standard federal, state, local, and tribal environmental record sources based on ASTM D 6008-recommended minimum search distances from the Site. A copy of the complete environmental database report is included in Appendix E.

There were no environmental permits issued for the Site; therefore, there were no permit applications or associated permit documentation available for review. There were no known contamination events on the Site that required an environmental cleanup; therefore, the Site did not participate in the Installation Restoration Program, Military Munitions Response Program, or a Compliance Cleanup program.

TEJV interviewed local authorities and reviewed reasonably accessible USAR environmental documents, Oklahoma Corporation Commission (OCC) files, City of Clinton records, and historical aerial photographs and maps to investigate environmental conditions at the Site and surrounding area. Available information on and the potential impact of environmental conditions on the Site were each assessed.

TEJV conducted multiple interviews with relevant personnel to discuss general environmental interest and specific areas of interest identified during the records review and visual reconnaissance. Copies of the interview reports are included in Appendix D; Section 9.0 of this report identifies the individuals interviewed with respect to conditions and operations at the Site and the information from those interviews incorporated into this report.

### 5.1 FEDERAL ENVIRONMENTAL RECORDS

#### 5.1.1 Federal National Priorities List Sites within One Mile

The National Priorities List (NPL) is a subset of the CERCLA Information System (CERCLIS) and identifies over 1,200 sites for priority cleanup under the Superfund Program. According to the environmental database search, the USAR Center is not a listed NPL site, and no other NPL sites were located within one mile of the Site.

#### 5.1.2 Federal CERCLA Information System Sites within One-Half Mile

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies, and private persons, pursuant to

Section 103 of CERCLA. CERCLIS contains sites that are either proposed to be or are on the NPL, and sites that are in the screening and assessment phase for possible inclusion on the NPL. According to the environmental database report, the USAR Center is not a CERCLIS site and there are no CERCLIS sites located within one-half mile of the Site.

#### **5.1.3 Federal CERCLIS No Further Remedial Action Planned Sites within One-Half Mile**

CERCLIS No Further Remedial Action Planned (NFRAP) sites have been removed and archived from CERCLIS. NFRAP status indicates that, to the best of USEPA's knowledge, assessment at a site has been completed and that no further steps will be taken to list this site on the NPL unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with the site; it means that, based on available information, the location is not judged to be a potential NPL site. According to the environmental database report, the USAR Center is not a CERCLIS NFRAP site and there are no CERCLIS NFRAP sites located within one-half mile of the Site.

#### **5.1.4 Resource Conservation and Recovery Act Corrective Action Sites within One Mile**

Resource Conservation and Recovery Act (RCRA) corrective action sites (CORRACTS) represent facilities that have generated or managed hazardous wastes and require corrective action. According to the environmental database report, the USAR Center is not a CORRACTS. No CORRACTS were identified within one mile of the Site.

#### **5.1.5 RCRA Transport, Treatment, Storage, and/or Disposal Facilities within One-Half Mile**

The RCRA Information Database (RCRAInfo) includes selective information on sites that generate, transport, and treat, store, and/or dispose (TSD) of hazardous waste as defined by RCRA. According to the environmental database report, the USAR Center is not a RCRA TSD site and there are no such sites located within one-half mile.

#### **5.1.6 Federal RCRA Small- and Large-Quantity Generators List within One-Quarter Mile**

Conditionally exempt small-quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. RCRA small-quantity generators (SQGs) are defined as facilities generating between 100 kg and 1,000 kg of hazardous waste per month, while a large-quantity generator (LQG) is defined as a facility generating more than 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month.

The Donald A. Roush USAR Center is listed as a CESQG on RCRAInfo. USAR personnel said that USAR centers generated small quantities of hazardous waste, such as used

fluorescent light bulbs, as part of their normal operation. They reported that all of the materials were properly managed and disposed; no records of violations were found during the ECP record review process.

No RCRA SQGs or LQGs are within one-quarter mile of the Site.

#### **5.1.7 Federal Emergency Response Notification System List**

The federal Emergency Response Notification System (ERNS) List provides information on reported releases of oil and hazardous substances. According to the environmental database report, the USAR Center is not a listed ERNS Site.

### **5.2 State and Local Environmental Records**

The regulatory information presented below was obtained from the environmental database search report. Supplemental information was also provided from research at the OCC.

#### **5.2.1 State Voluntary Cleanup and Superfund Site Status Reports within One Mile**

There are no State Voluntary Cleanup and Superfund Sites with one mile of the USAR Center.

#### **5.2.2 State-Registered Solid Waste Facilities within One-Half Mile**

According to the environmental database report, no solid waste landfills, incinerators, or transfer stations are located within one-half mile of the USAR Center. There is no solid waste landfill, incinerator, or transfer station on the Site.

#### **5.2.3 State-Registered Leaking UST Sites within One-Half Mile**

According to the environmental database report, four leaking UST (LUST) sites were identified within one-half mile of the USAR Center. Table 4 lists the sites along with their addresses and elevations relative to the Site. The Site itself is not listed in the state LUST database.

TEJV researched and reviewed files in the OCC and visually observed each site in the field. As shown in Table 4, all four LUST sites have received closure approval from the OCC, indicating that no further remedial action is required and that residual petroleum contamination does not pose a risk to human health or the environment. These LUST sites are not considered to be a potential environmental risk to the Site due to their location and current closed status. OCC documentation for these sites is in Appendix D.

<b>Table 4</b>				
<b>LEAKING UNDERGROUND STORAGE TANK SITES</b>				
<b>Site Name/ OCC Facility No.</b>	<b>Address</b>	<b>Distance and Direction from Site</b>	<b>Status</b>	<b>Elevation Relation to Site</b>
Clinton Coca-Cola #2007085	2310 Corbin Lane Clinton, OK	Approximately 2,000 feet west-southwest of Site, on west side of Gary Boulevard	Closure approved via OCC letter on March 8, 1994	Lower
Classic Car Care (Old Texaco Station) #0-013154	2134 Gary Boulevard Clinton, OK	Approximately 1,300 feet west of Site	See Abandoned Station #2009122	Lower
Abandoned Station (Texaco Station) #2009122	2140 Gary Boulevard Clinton, OK	Approximately 1,300 feet west of Site	Final Closure Report approved by OCC February 27, 2003. Currently a Subway store.	Lower
Paul's 66 #2009935	I-40/Neptune Road Clinton, OK	Approximately 3,000 feet south-southeast of Site	Closure approved via OCC Letter on December 11, 2003	Lower

#### 5.2.4 State-Registered UST Sites within One-Quarter Mile

USTs are regulated under RCRA Subtitle I and must be registered with the state department responsible for administering the UST program. The environmental database report identified four UST sites in the OCC UST database within one-quarter mile of the Site. Table 5 lists the sites along with their address and elevation relative to the Site. The USAR Center itself is not listed in the OCC UST database. These UST sites are all inactive and are not considered to be a potential environmental risk to the Site due to their location and current closed status.

Company/Site	Address	Distance and Direction from Site	Status	Elevation Relation to Site
Clinton Coca-Cola #2007085	2310 Corbin Lane Clinton, OK	Approximately 2,000 feet west-southwest of Site, west of Gary Blvd	Closure approved via OCC Letter on March 8, 1994	Lower
Clinton Public School #20001439	2130 Gary Freeway Clinton, OK	Approximately 1,300 feet south of Site	Permanently out of use. Closure approved via OCC Letter on May 17, 1999	Lower
Texaco Station #2009122	2134 Gary Blvd Clinton, OK	Approximately 1,300 feet west of Site	Final Closure Report approved by OCC February 27, 2003. Same site as Abandoned Station in LUST section. Currently a Subway Store on site.	Lower
Classic Car Care (Old Texaco Station) # 0-013154	2134 Gary Blvd Clinton, OK	Approximately 1,300 feet west of Site	See Texaco Station #2009122.	Lower

**5.2.5 State-Registered UST Sites, List II Version within One-Quarter Mile**

The UST Sites, List II Version, includes historical UST sites and information through March 2003 from OCC. The environmental database report identified four historical UST sites within one-quarter mile of the Site. The List II Version historical sites are presented on Table 5; they are the same sites listed in the UST database.

**5.2.6 State-Registered Leaking AST Sites within One-Half Mile**

According to the environmental database report there are no state-registered leaking ASTs within one-half mile of the USAR Center.

#### **5.2.7 State-Registered AST Sites within One-Quarter Mile**

According to the environmental database report there are no state-registered ASTs within one-quarter mile of the USAR Center.

#### **5.2.8 State-Registered Sites with Institutional Controls within One-Half Mile**

Institutional controls include administrative procedures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining onsite. According to the environmental database report, no state-registered sites with Institutional Controls are located within one-half mile of the USAR Center.

#### **5.2.9 Voluntary Action Program Sites within One-Half Mile**

Brownfields sites are included on the Superfund Voluntary Cleanup, Oversight, and Assistance Program listing. According to the environmental database report, no state-registered Voluntary Action Program Sites are located within one-half mile of the USAR Center.

#### **5.2.10 State-Registered Dry-Cleaning Facilities within One-Quarter Mile**

According to the environmental database report, there are no state-registered Dry-Cleaning Facilities within one-quarter mile of the USAR Center.

#### **5.2.11 State Brownfields Program Sites within One-Half Mile**

Included in the state brownfields program listing are brownfields properties addressed by Cooperative Agreement Recipients and brownfields properties targeted by Targeted Brownfields Assessments. According to the environmental database report, no state-registered Brownfield Program Sites are located within one-half mile of the USAR Center.

### **5.3 TRIBAL ENVIRONMENTAL RECORDS**

According to the environmental database report, no designated Indian Reservations are located within one mile of the USAR Center.

### **5.4 UNMAPPED SITES**

The environmental database search yielded 29 unmapped sites. Unmapped sites are those with insufficient address information such that they can only be identified within the zip code of the target Site. The TEJV identified and/or estimated the location of each site and none of them were determined to be within the corresponding ASTM D 6008-recommended minimum search distances for the databases on which they were listed.

#### **5.5 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO SITE**

During review of environmental information summarized in Section 5, multiple databases and sites were reviewed to evaluate potential risks to the Site. Based on an evaluation of available information and details concerning the identified sites, no "High Risk" sites were identified in the area of the Site. "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

## 6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

Findings documented in the following subsections are based on the July 25 and 26, and August 23, 2006, visual reconnaissance, review of available Site records, and information obtained from USAR personnel.

### 6.1 USTs AND ASTs

Based on observations and interviews with USAR personnel, no petroleum USTs or ASTs are currently located at the Site.

### 6.2 INVENTORY OF CHEMICALS/HAZARDOUS SUBSTANCES

During the July 25 and 26, 2006, visual reconnaissance, there was no evidence that hazardous substances above RQs were stored for one year or more, released, or disposed at the Site. The OMS was virtually empty and contained an unused drum overpack. As shown on Photograph 24 in Appendix B, some absorbent material and what appeared to be remnants of the bags that previously contained the absorbent material was observed on the floor of the old hazmat shed. No chemicals were observed in the shed. During the July 2006 visual reconnaissance, no materials were observed in the new hazmat shed; it appeared to have never been used as the shelves were not installed. The new hazmat shed was removed from the Site prior to the TEJV's August 23, 2006, visual reconnaissance.

### 6.3 WASTE DISPOSAL SITES

No signs of landfills or illegal waste disposal activities were observed on the Site during the visual reconnaissance.

### 6.4 PITS, SUMPS, DRY WELLS, AND CATCH BASINS

The Site is served by a sanitary sewer system from the City of Clinton. All wastewater generated within the buildings discharges to the sanitary sewer system. Training Building floor drains are located within the kitchen, mechanical room, and restrooms. There is a grease trap outside the kitchen; however the kitchen has not been used since the 1980s.

Storm water drains off the Site to storm drains on Opal Street to the north and Jaycee Lane to the south.

### 6.5 ASBESTOS-CONTAINING MATERIAL

As described in Section 3.5.5, ACM previously identified in the USAR Center buildings was reportedly removed. TEJV was not provided with written documentation regarding removal of asbestos from the Site.

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#### **6.6 PCB-CONTAINING EQUIPMENT**

TEJV contacted the District Engineer of AEP-PSCO regarding two transformers on the Site and was told that both are non-PCB containing units. No visible leaks were observed in the transformers during the visual reconnaissance. As described in Section 3.5.8, there is no other known PCB-containing equipment on the Site.

#### **6.7 LEAD-BASED PAINT**

As described in Section 3.5.3, LBP was detected on the Site during a 1994 assessment by ETC Engineers, Inc. During the July 2006 visual reconnaissance, the painted surfaces in both buildings appeared to be in good condition.

#### **6.8 RADON**

The Site is in USEPA's Radon Zone 3, which has "Low Potential" for radon. The average short-term radon measurement that can be expected in a Zone 3 building, without the implementation of radon controls, is less than 2.0 pCi/L. The USEPA-recommended action level is 4.0 pCi/L.

The state radon database for Custer County, referenced in the environmental database report, lists the average indoor radon reading as 1.24 pCi/L. The federal database for zip code 73601 indicates that the average first floor living space radon reading is 1.214 pCi/L. This information is consistent with the actual readings previously described for the Site.

#### **6.9 UNEXPLODED ORDNANCE**

No evidence was found during the visual reconnaissance or records review process of the past presence of munitions and explosives of concern.

#### **6.10 RADIOACTIVE MATERIALS**

During the July 2006 visual reconnaissance and records review process, no indications were found of the past storage or release of radiological materials at the USAR Center.

## **7.0 REVIEW OF SPECIAL RESOURCES**

### **7.1 LAND USE**

The Site and surrounding area are zoned for residential use. The Site and most of the surrounding area are zoned for R-1, Single-Family Residential with some smaller specific areas in the vicinity zoned R-3, Multifamily Residential. Figure 11 in Appendix A provides a 2006 aerial photograph of the USAR Center and surrounding properties and depicts current land use. As shown in that figure, the areas west, north, and south of the Site are residential; the area south of the Site contains Clinton High School.

### **7.2 COASTAL ZONE MANAGEMENT**

There is no coastal zone management plan for Oklahoma.

### **7.3 WETLANDS**

The Site is upland and well drained. According to the U.S. Fish and Wildlife Service National Wetlands Inventory map, no jurisdictional wetland areas are identified on the Site, adjacent properties, or within the City of Clinton. The nearest wetland is located approximately 3,000 feet northwest of the Site. Figure 4 in Appendix A provides a map of wetlands in the area of the Site.

### **7.4 100-YEAR FLOOD PLAIN**

The (FEMA) Flood Hazard Area map indicates that the Site lies outside the 100-year flood plain. Figure 3 in Appendix A provides a map of the 100-year flood plain in the area of the Site. As shown on that figure, the Site is in flood Zone C, which FEMA defines as "areas of minimal flooding."

### **7.5 NATURAL RESOURCES**

As described in Section 3.5.6, the USAR Center does not contain habitat for threatened and endangered species. Except for potential incidental use by migrants, the threatened and endangered species are unlikely to occur at the Site.

### **7.6 CULTURAL RESOURCES**

As described in Section 3.5.7, a cultural resource assessment was performed for the Site. The conclusion was that there were no architectural or archaeological issues at the Donald A. Roush USAR Center. The Site has a "low" archaeological potential and is not eligible for the National Registry of Historical Places.

### **7.7 OTHER SPECIAL RESOURCES**

There are no other known resources that could affect the Site.

## 8.0 CONCLUSIONS

The TEJV, under contract to the USACE Louisville District, was authorized to prepare an ECP Report for the 4.75-acre Donald A. Roush (Facility ID OK007) USAR Center, located at 1720 Opal Street in Clinton, Custer County, Oklahoma. The USAR Center is currently vacant; the last unit to occupy the facility was the 818<sup>th</sup> Replacement Company. The Site contains a Training Building and an OMS. The Site primarily functioned as an administrative and educational facility when it operated as a USAR Center from 1960 to 2004.

Findings of this ECP are based on existing environmental information, including visual observations, Site records, and federal, state, and local database and file information related to the storage, release, treatment, or disposal of hazardous substances or petroleum products or derivatives on the property. The following present the findings related to areas evaluated during the ECP process.

- **Hazardous Substances.** Chemicals containing CERCLA hazardous substances would have historically been used and stored at the Site in amounts necessary to support limited unit-level vehicle maintenance and building maintenance activities. However, the quantities stored would not have exceeded 1,000 kg or the RQ of designated hazardous substances, or one kg of acutely hazardous waste. There is no evidence that the chemicals used or stored were improperly handled, released, or disposed at the Site.
- **USTs/ASTs.** No petroleum ASTs or USTs are currently on the Site, nor have ASTs or USTs reportedly ever been on the Site since the U.S. government's purchase of the property in 1958.
- **Vehicle Wash Rack.** A VWR with an OWS was previously located on the Site within the MEP fenced area near the OMS. According to USAR personnel, the VWR and OWS and contaminated soil (if any) were removed from the Site in 1993. The area is now covered in grass with no visible evidence of either the VWR or OWS.
- **Non-UST/AST Petroleum Storage.** Petroleum storage would have occurred in designated areas within the OMS and hazmat storage shed located in the OMS. There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on the Site.
- **PCBs.** A PCB assessment was performed in 1997 on the nearby offsite electric transformers that feed the Site and the fluorescent lighting fixtures on the Site. Based on the assessment and contact with AEP-PSCO, the transformers were determined to be non-PCB containing. The fluorescent lighting fixtures were also identified as non-PCB units.

- **ACM.** Two asbestos surveys were performed on the Site: one in 1993 and one in 1997. The 1997 asbestos survey indicated that there was ACM and suspect ACM at the Site. According to interviews with USAR personnel, ACM within the USAR Center was removed. The work was performed between 1998 and 2000. USAR personnel were not able to locate specific documentation or reports describing the work and/or when it was performed.
- **LBP.** ETC Engineers, Inc. performed a LBP assessment of the USAR Center in 1994. The assessment documented materials/surfaces containing LBP. During the July 2006 visual reconnaissance, painted surfaces in the buildings were observed to be in good condition.
- **Radiological Materials.** No radiological materials were identified during the July 2006 visual reconnaissance or during interviews with USAR personnel. There is no evidence that radioactive material or sources were stored or released at the Site.
- **Radon.** In 1993, radon tests were performed at six locations in the Training Building. All results were 1.0 pCi/L or less. The Site is in the USEPA Radon Zone 3, which has "Low Potential" for radon. The USEPA-recommended action level is 4.0 pCi/L. Therefore, based on actual measurements and the general location of the Site, radon is not an environmental concern at the Site.
- **Munitions and Explosives.** No evidence was found during the July 2006 visual reconnaissance, interviews with USAR personnel, or during the review of records to indicate the presence of munitions and explosives of concern at the Site.
- **Nearby Properties.** Potential environmental sites of concern located within corresponding ASTM D 6008-recommended minimum search distances from the Site were evaluated. None of the properties evaluated are considered "High Risk." "High Risk" properties are those that exhibit environmental conditions that have the probability of adversely affecting the environmental conditions at the Site. Land use at the adjacent properties does not appear to have changed significantly since the USAR Center was built and does not appear to have impacted the environmental conditions of the USAR Center.

Areas of potential environmental concern were reviewed and the TEJV found no significant issues relating to the environmental condition of the Site. In accordance with DoD policy defining the classifications (See S.W. Goodman Memorandum dated October 21, 1996), the Site has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

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## 9.0 REFERENCES

### ***Persons Contacted***

- Mr. Grayson Bottom. City of Clinton, Clinton City Manager, Clinton, OK. (580) 323-0261. Meeting on July 26, 2006 and Telecommunication on August 7, 2006.
- Mr. Mike Galloway. Custer County Emergency Management Director, Arapaho, OK 580-323-4105
- Mr. Tommy D. Grizzle. 90<sup>th</sup> RRC, Army Installation Management, Engineering Support Branch, Fort Sill, OK 580-442-5966. Telecommunications on August 23 and 24, 2006
- Mr. Jerry Hughes. Environmental Scientist, Engineering & Environment, Inc. (USAR Contractor), Oklahoma City, OK. (405) 946-4967. Meeting on July 26, 2006, and Telecommunications on August 7 and 8, 2006.
- Mr. Greg McSpiritt. AEP-PSCO Engineer, 580-323-4411 ext 4. Telecommunication on August 8, 2006.
- Mr. Douglas Rose. U.S. Department of Agriculture, Custer County Farm Service Agency. (580) 323-0366. Meeting on July 26, 2006.
- Mr. Ed Wagner. 90<sup>th</sup> RRC. Area Facility Operational Specialist (AFOS) Oklahoma City, OK. (405) 948-1003. Telecommunications on August 23 and 24, 2006.

### ***Resources Consulted***

- Aerial Photographs dated 1940, 1955, 1995, and 2006 provided by Oklahoma Department of Libraries.
- City of Clinton, Zoning Map.
- Department of the Army, Headquarters 122D U.S. Army Reserve Command. *Memo with asbestos and radon data for Roush USARC*. September 28, 1993.
- ECCI. *Environmental Baseline Survey for Disposal of Donald A. Roush U.S. Army Reserve Center*. November 2004.
- Environmental Data Resources Inc. *The EDR Radius Map with GeoCheck, 440 Wheelers Farms Road, Milford, Connecticut 06461*. Inquiry No. 1714475.2s. July 13, 2006.

- ETC Engineers, Inc. *Report of Findings, Lead-Based Paint and Ozone Depleting Chemicals Assessment and Management, Roush USARC, Clinton, Oklahoma* for U.S. Army Corps of Engineers, Little Rock District. January 1994.
- Federal Emergency Management Agency. *Flood Insurance Rate Map, City of Clinton, Oklahoma, Custer County, Community Panel Number 400054 0005 D.* Map revised: April 3, 1987.
- NETR-Real Estate Research & Information, 2055 East Rio Salado Parkway, Tempe, Arizona, 85281 (chain of title). Project No. N06-4906. August 1, 2006.
- Oklahoma Corporation Commission, Petroleum Storage Tank Division. File reviews of UST and LUST sites.
- Parsons Engineering Science, Inc. *Management Summary, Cultural Resources Assessment of 90<sup>th</sup> Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma and Texas* (for Department of the Army, 90<sup>th</sup> RRC). February 1998.
- Parsons Engineering Science, Inc. *Historic Architectural Resources Assessment of the 90<sup>th</sup> Regional Support Command Facilities in Oklahoma.* February 1998.
- Parsons Engineering Science, Inc. *Final Phase 2 Threatened and Endangered Species Habitat Analysis of the 90<sup>th</sup> RRC Facilities* (for the Department of the Army, 90<sup>th</sup> RRC). August 2005.
- U.S. Army 90<sup>th</sup> RRC. *Asbestos Building Inspection, Donald A. Roush U.S. Army Reserve Center, Clinton, Oklahoma.* February 1997.
- U.S. Army Center for Health Promotion and Preventive Medicine. *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97* (for 90<sup>th</sup> RRC). September 30, 1997.
- U.S. Fish & Wildlife Services, Branch of Habitat Assessment, *National Wetlands Inventory Wetlands Mapper.* <http://wetlandsfws.er.usgs.gov/wtlnds/launch.html>

**Agencies Contacted**

- Oklahoma Corporation Commission, Petroleum Storage Tank Division
- American Electric Power, Public Service Company of Oklahoma
- City of Clinton, Oklahoma
- Oklahoma Department of Libraries
- United States Fish and Wildlife Service, Department of Interior
- Federal Emergency Management Agency

RESOLUTION NO. 750

A RESOLUTION VESTING THE POWERS DESCRIBED IN  
TITLE 11 O.S. ' 38-101 *ET SEQ.*, IN THE CLINTON URBAN  
RENEWAL AUTHORITY

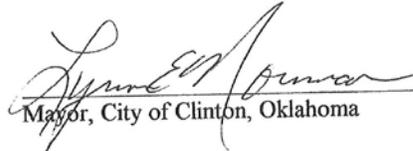
WHEREAS, it is in the public interest and desires that the powers, as described in Title 11 O.S. ' 38-101 *et seq.* be vested in the Clinton Urban Renewal Authority; and

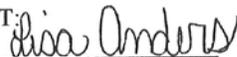
WHEREAS, there exists within the City of Clinton blighted areas which require rehabilitation, conservation, redevelopment, or a combination thereof, in the interest of public health, safety, morals and welfare of the residents of this city,

NOW THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF CLINTON, OKLAHOMA:

That the Clinton Urban Renewal Authority shall have the powers described in Title Title 11 O.S. ' 38-101 *et seq.*, to rehabilitate, conserve, redevelop the blighted areas within the City of Clinton.

PASSED AND APPROVED this 6 day of June, 2006.

  
\_\_\_\_\_  
Mayor, City of Clinton, Oklahoma

ATTEST:   
\_\_\_\_\_  
City Clerk, City of Clinton,  
Oklahoma

C-1

RESOLUTION NO. 755

A RESOLUTION REGARDING THE APPOINTMENT OF A  
BOARD OF COMMISSIONERS OF THE URBAN RENEWAL  
AUTHORITY

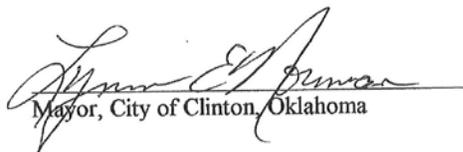
WHEREAS, the City of Clinton has created an Urban Renewal Authority, under Title 11 O.S.  
' 38-101 *et seq*;

WHEREAS, the Board of Commissioners of the Urban Renewal Authority shall consist of  
five members;

NOW THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF  
CLINTON, OKLAHOMA:

That the Board of Commissioners of the Urban Renewal Authority shall consist of the Mayor  
and all four councilmen, to serve three year terms, however, an individual may not serve on the Board  
of Commissioners unless also serving as a city councilman on the City Council.

PASSED AND APPROVED this 3 day of July, 2006.

  
\_\_\_\_\_  
Mayor, City of Clinton, Oklahoma

ATTEST:   
\_\_\_\_\_  
City Clerk, City of Clinton,  
Oklahoma

C-2

# Roush Center disposal process now beginning

Clinton has the distinction of having the smallest military base in the United States to be declared surplus in the latest round of Base Realignment and Closure actions, City Manager Grayson Bottom says.

No need to worry, though. The city is not about to lose a major employer or contributor to the local economy. That's because the base has already been inactive for several years.

It's the Roush Army Reserve Center located on Opal Avenue, north of Clinton High School. And while it consists only of two buildings on 4¼ acres of land, Bottom says the government has to go through all the hoops of disposing of it just as if it were a 20,000-acre Army base.

Bottom said that since there was no reversionary clause in the deed conveying the property to the Department of Defense before the center was built in 1960, there are two possible ways of disposing of the property. One, the city can do nothing and let DoD make all the decisions, or two, it can form a local redevelopment

authority.

At a meeting of citizens held April 12, he said it was the unanimous consensus that a local redevelopment authority be formed. The authority must be an independent body, he said, meaning it may not be a mirror image of the City Council. On the other hand, information received from the Office of Economic Adjustment of

DoD says it should include "representatives from those jurisdictions with zoning authority over the property." In this case, that would be the City Council.

Property declared surplus through the BRAC proceedings may be conveyed to state and local governments and other eligible entities for "public benefit purposes," according to an ad published the past week in the *Clinton Daily News*. At least three such entities have reportedly expressed an interest in the Roush Center: the Oklahoma Highway Patrol, the Oklahoma Army National Guard, and the Clinton Public Schools.

The ad said that "notices of interest" must (See MAYOR, P. 2)



(Continued from P. 1)

be submitted to the Base Transition Coordinator for this area, located at Little Rock, Ark., within 90 days.

Bottom said there is no designated pecking order as it relates to federal, state and local governmental entities wanting the property.

He said the city did meet a May 9 deadline of informing DoD that a local redevelopment authority would be formed, although the members have not yet been named. He said it's his understanding Mayor Lynn Norman will appoint the members with the advice and consent of the City Council.

A timetable issued by the Office of Economic Administration gives the LRA 270 days from the cutoff date for "notices of interest" to prepare a redevelopment plan for suggested use of the property.

Lynn Boese of Arlington, Va., project manager for the OEA, attended the April 12 meeting held here.

Information on file at City Hall shows that the U.S. government paid \$16,000 for the Roush Reserve Center land in 1958. Grantors were Billie Jo Arnold, James E. Arnold, Josephine Havens Chody, and Byron Chody.

5-14-06

5-14-06

D-1

# Local BRAC authority named

7-7-06  
Six other people have been appointed by Mayor Lynn Norman to serve with him on a Local Redevelopment Authority to recommend future use of the Roush Army Reserve Center.

The seven-member authority was confirmed by the Clinton City Council at its meeting Monday evening.

Norman will chair the authority. Other members will be Terry Harms, Chris Jones, Sherri Klein, Hong Kluver, Ron Stephenson and Kevin Wolters.

The mayor said he solicited recommendations from councilmen and also talked to those named before presenting them for official confirmation.

"I asked you for people who think out of the box," he told the council.

Norman, a retired U.S. Army colonel, said he had spoken recently with a friend who is heading up disposition of the famed Walter Reed Army Hospital outside Washington,

D.C., which is part of the same round of Base Realignment and Closure actions as the Roush Center.

City Manager Grayson Bottom said disposition of the center here must be done using the same rules as those for the Walter Reed facility.

At least three local organizations — Troop H of the Oklahoma Highway Patrol, the Clinton battery of the Oklahoma Army National Guard, and the Clinton Public Schools — reportedly are interested in the Roush Reserve Center. Bottom (See 7<sup>th</sup> Authority, P. 2)

## City sets up 7<sup>th</sup> authority

(Continued from P. 1)

previously said there is no designated pecking order as it relates to federal, state and local organizations wanting the property.

Before confirming the LRA appointments, councilmen named themselves as commissioners of a new Urban Renewal Authority to oversee the LRA. It will be the city's seventh trust authority, with councilmen serving as trustees for all.

Previously existing authorities were the Clinton Hospital Authority, Recreational Authority, Airport Authority, Public Works Authority, Solid Waste Authority, and Industrial Authority.

July 25, 2009

THE WEEKEND

\*\*\*\*\*  
SWOD,  
PO BO  
BURNS

# CLINTON DAILY

## Meeting on Roush property August 4

Another public hearing concerning future use of the Roush Army Reserve Center on Opal Avenue is scheduled at 5:30 p.m. Tuesday, Aug. 4, immediately prior to that evening's regular Clinton City Council meeting.

Purpose of the hearing is to receive comments regarding the redevelopment plan for the center, but it may be more of a go-through-the-motions proceeding.

A copy of the plan is available for public scrutiny weekdays from 8 a.m. to 12 noon and from 1 p.m. to 5 p.m. at the office of City Clerk Lisa Anders in the Clinton City Hall.

However, a quick review of the plan Wednesday by the *Clinton Daily News* disclosed no recommendations concerning future use of the property. It did contain letters from the following entities saying they either have no use for it as a homeless shelter or do not have the funds to develop it for that purpose: the Clinton Mission House, Department of Human Services, Multi-County Youth Services, Action Associates, and Red Rock Behavioral Health Service. The Mission House did ask for

kitchen equipment in the center.

Initially, when the property was declared surplus by the federal government, directives indicated first priority should be given to organizations serving the homeless.

Later the Clinton Public Schools appeared to be the front-runner for the property but abandoned interest when the cost and red tape to meet mandatory federal guidelines for upgrading it was going to be more than school officials felt it was worth to them at the time.

City Manager Grayson Bottom said Wednesday the city could wind up as the owner of the property if the federal government is willing to accept the price that has been mentioned. Should that happen, he indicated it possibly would be used as an adult education center with such things as G.E.D. classes and life-skills training offered, with the organization(s) conducting the classes and training still to be determined. Space also would be available, he indicated, for other educational institutions to have outreach programs.

Mayor Allen Bryson (See ROUSY, P. 2) →

Clinton 7-25-09

## ROUSH

(Continued from P. 1) said Wednesday if the city gets the property, it still might be able to pass it on to the Clinton Schools.

The center was last used by the U.S. Army Reserve in 2004.

Its disposition has been in the works since May of 2006. Most of the information in the redevelopment plan is dated March 27, 2007.

Bottom indicated one public hearing was held about that time but said the Department of Housing and Urban Development is requiring another one now.

D-3

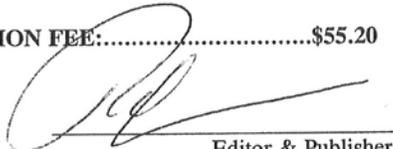
**PROOF OF PUBLICATION**

Clinton Daily News  
522 Avant Ave.  
Clinton, OK 73601  
(580)-323-5151

I, Rodney J. Serfoss, of lawful age, being duly sworn upon oath, deposes and says that I am the Editor & Publisher of The Clinton Daily News, a weekly publication that is a "legal newspaper" as that phrase is defined in 25 O.S. Section 106 for the City of Clinton, for the County of Custer, in the State of Oklahoma, and that the attachment hereto contains a true and correct copy of what was actually published in said legal newspaper in consecutive issues on the following dates:

INSERTION DATE(S): **June 2, 2006**

PUBLICATION FEE:.....\$55.20

  
\_\_\_\_\_  
Editor & Publisher

Signed and sworn to before me this 2nd day of June, 2006.



  
\_\_\_\_\_  
Notary Public

My Commission expires: 05/04/10  
Commission #06004480

LEGAL NOTICE NO. 18792  
(Published in The Clinton Daily News June 2, 2006)

**PUBLIC NOTICE OF TIME FRAME FOR EXPRESSION OF INTEREST FOR HOMELESS PROVIDERS AND NON-FEDERAL PUBLIC AGENCIES RE: ARMY SURPLUS PROPERTY LOCATED AT THE DONALD A ROUSH US ARMY RESERVE CENTER, CLINTON, CUSTER COUNTY, OKLAHOMA.**

This public notice provides information and establishes a time frame for the submission of expressions of interest regarding the reuse of a portion of the property declared surplus at the Donald A. Roush USARC, which is located in Clinton, Custer County, Oklahoma. The property is available under provisions of the Federal Property and Administration Services Act of 1949 and the Base Closure Community Redevelopment and Homeless Assistance Act of 1964.

The property declared surplus is a piece of real property that totals approximately 4.75 acres and contains three buildings covering 11,040 square feet. All utilities are available on site. The property is located in Clinton, Oklahoma at 1720 Opal Street.

All notices of interest must include all the requirements outlined in the Federal property

and Administration Service Act of 1949 and the Base Closure Community Redevelopment Act and Homeless Assistance Act of 1994.

The Clinton Redevelopment Authority has been recognized by the Office of Economic Adjustment as the agency responsible for planning the reuse of this parcel. The Clinton Redevelopment Authority has established a three-month screening process. Interested parties may submit Notice of Interest no later than 5 P.M. on Monday, September 18, 2006. Notices of interest from representative of the homeless shall include the information required by 32 CFR Part 176.20(c)(2) (ii).

The Clinton Redevelopment Authority will hold a public workshop on Tuesday, September 26, 2006 starting at 10:00 A.M. at the Frisco Center located at 101 South 4<sup>th</sup> in Clinton, Oklahoma.

The workshop is designed to provide information about the closure/reassignment and disposal process and to answer questions about the Local Redevelopment Authority's process.

The Clinton Redevelopment Authority is located at the office of the City Manager in Clinton City Hall at 415 Gary Boulevard in Clinton, Oklahoma. For information contact Grayson Bottom, City Manager at 580-323-0261.

**BASE REALIGNMENT AND CLOSURE  
NOTIFICATION OF SURPLUS PROPERTY**

The following listed property is surplus to the needs of the United States based upon the approved recommendations of the Base Closure and Realignment Commission and completion of screening with Federal and Department of Defense components. Surplus property may be available for conveyance to State and local governments and other eligible entities for public benefit purposes. Notices of interest from representatives of the homeless shall include the information required by 32 CFR Part 176.20(c)(2)(ii). Notices of interest must be submitted to the Army point of contact listed below within 90 days from the date of this notice. Notices of Interest received by the Army will be forwarded to the Local Redevelopment Authority listed below. The point of contact for the Army is:

**Commander 90<sup>th</sup> Regional Readiness Command  
Attn; Base Transition Coordinator  
8000 Camp Robinson Road  
North Little Rock, AR 72118  
Telephone: 501-771-8788**

**FACILITY TITLE: Donald A. Roush USARC ADDRESS: 1720 Opal Street  
CITY: Clinton ACRES: 4.75 SQ FT: 11040 # BLDGS: 3 YR BUILT: 1960**

The entity responsible for preparing the redevelopment plans for the property made surplus by the realignment and closure is:

**Clinton Redevelopment Authority  
P.O. Box 1177  
415 Gary Blvd  
Clinton, Ok 73601**

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## Legal Notice

LEGAL NOTICE NO.

18772

(Published in The Clinton Daily News May 22, 2006)

As part of the implementation of the 2005 Defense Base Closure and Realignment (BRAC) Report, this Notice provides the point of contact, addressee, and telephone number for the Local Redevelopment Authority (LRA) that has been recognized for planning the redevelopment of Donald A. Roush USARC, Clinton, Oklahoma. Representatives of state and local governments, homeless providers, and other parties interested in the redevelopment of the installation should contact the person or organization listed. The following information will be published in the Federal Register as well as newspaper(s) of general circulation in the area of Donald A. Roush USARC.

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

Installation Name: Donald A. Roush USARC  
LRA Name: Clinton Local Redevelopment Authority  
Point of Contact: Grayson Bottom  
City Manager  
City of Clinton  
Address: P.O. Box 1177  
415 Gary Boulevard  
Clinton, OK 73601  
Phone: (580) 323-0261

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**PROOF OF PUBLICATION**

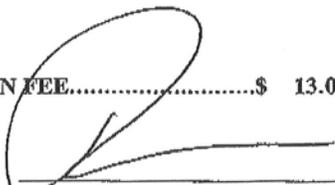
Clinton Daily News  
522 Avant Ave.  
Clinton, OK 73601  
(580)-323-5151

I, Rodney J. Serfoss, of lawful age, being duly sworn upon oath, deposes and says that I am the Editor & Publisher of The Clinton Daily News, a weekly publication that is a "legal newspaper" as that phrase is defined in 25 O.S. Section 106 for the City of Clinton, for the County of Custer, in the State of Oklahoma, and that the attachment hereto contains a true and correct copy of what was actually published in said legal newspaper in consecutive issues on the following dates:

INSERTION DATE(S): July 25, 2009

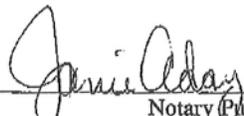
Legal Notice No. LPXLP 20434  
(Published In The Clinton Daily News July 25, 2009)  
The City of Clinton will be holding a Public Hearing on Tuesday, August 4, 2009 at 5:30 P.M. in the Council Room of Clinton City Hall to receive comments regarding the Redevelopment Plan Concerning the Reuse of the Donald A. Roush U.S. Army Reserve Center. A copy of the plan is available for review in the Office of the City Clerk between the hours of 8:00 A.M. and 5:00 P.M. Monday through Friday.

PUBLICATION FEE.....\$ 13.05

  
\_\_\_\_\_  
Editor & Publisher

Signed and sworn to before me this 27th day of July, 2009.



  
\_\_\_\_\_  
Notary Public

My Commission expires: 05/04/10  
Commission #06004480

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**PUBLIC HEARING  
TUESDAY, AUGUST 4, 2009  
CITY HALL  
5:30 P.M.**

Minutes of a Public Hearing held in the Clinton City Council Room, City Hall on Tuesday, August 4, 2009 at 5:30 P.M. A notice of this meeting with agenda was posted on the bulletin board in the lobby of Clinton City Hall on July 22, 2009.

The public hearing was to receive comments on the Redevelopment Plan Concerning the Reuse of the Donald A. Roush U.S.Army Reserve Center.

Luther Newman said his concern would be to encourage the use of the facility for military. He said he would be disappointed if it were used for some type of business. He thought that the school using the facility for the ROTC program was a good fit.

Mayor Allen Bryson said some things are out of the city's control.

Councilman Mark Hendrickson said the school would have to confirm their desire for the use of the building for an ROTC site.

The public hearing was adjourned

Those present included:

Chairman Allen Bryson  
Council members: Mark Hendrickson  
John Jordan  
Terry Wheeler  
Bob Marcy  
City Manager Grayson Bottom  
City Clerk Lisa Anders  
Gene McCullough  
Charles Fry  
Wade Anders  
Alan Burgtorf  
David Crabtree  
Luther Newman  
Ryan Meacham  
Gerald Green  
and others.

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## Special Initiatives

### Homeless Program & HOPWA



#### Homeless Shelters

4th Street Rescue Mission  
300 South Seventh  
Clinton, OK 73601  
Ward Hall  
(405) 323-5916

C. Carter Crane Shelter  
P.O. Box 926  
Lawton, OK 73502  
Betty Caldwell  
(580) 248-0936

Christian Coffee House  
212 North Washington  
Elk City, OK 73644  
Eldon Drane  
(405) 225-4625

City Rescue Mission  
523 S. Robinson  
Oklahoma City, OK 73109  
Glenn Cranfield  
(405) 232-2709

Community Outreach Centers, Inc.  
P.O. Box 1068  
Salina, OK 74365  
Jeanne Fuller  
(918) 434-2867

Duncan Rescue Mission, Inc.  
102 N. Fifth  
Duncan, OK 73533  
Roger Latham  
(405) 255-4679/0933

East Main Place  
1100 East Main  
Norman, OK 73071  
Tom Roach  
(405) 447-4663

Geary Ave. Mission Home  
2211 NE 23 Street  
Oklahoma City, OK 73111

*no longer in service*

▶ Special Initiatives

HOPWA  
Housing Pilot Program

▶ OHFA Homepage

▶ About OHFA

▶ Housing Development

▶ OHFA Advantage

▶ Renters & Landlords

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<http://www.ohfa.org/OHFA/new/Special/homelessshelters.htm>

7/9/2009

Alice Marie Jackson  
(405) 427-6463

Gospel Rescue Mission  
326 South Second Street  
Muskogee, OK 74402  
Tom Willford  
(918) 682-3489

Grace Rescue Mission  
2205 Exchange  
Oklahoma City, OK 73108  
Gerald Lumsford  
(405) 232-5756

Helping Hands Outreach  
215 East 13th Street  
Ada, OK 74820  
Sam Pierce  
(405) 436-1556

Hope House of Cherokee County  
P.O. Box 2052  
Tahlequah, OK 74465  
[hopehouse@tah-usa.net](mailto:hopehouse@tah-usa.net)  
Laura Garner  
(918) 456-4673

Inner City Missions  
P.O. Box 5142  
Enid, OK 73702  
Joe Nicholson  
(405) 233-2726

Inspirational Homeless Mission  
730 W. California Street  
Oklahoma City, OK 73102  
Charlie Johnson  
(405) 235-5161

Isaiah Lighthouse, Inc.  
941 N. Union  
Shawnee, OK 74820  
Kathy Norman  
(405) 273-7550

Jesus House  
1335 W. Sheridan  
Oklahoma City, OK 73106  
Sherry Mercer  
(405) 232-7164

John 3:16 Mission  
506 N. Cheyenne  
Tulsa, OK 74103  
Phil Dickerson  
(918) 587-1186

<http://www.ohfa.org/OHFA/new/Special/homelessshelters.htm>

7/9/2009

Little Dixie Community  
Action Foundation  
502 West Duke Street  
Hugo, OK 74743  
Shirley Johnson  
(405) 326-2364

Mission House, Inc.  
P.O. Box 1522  
Clinton, OK 73601  
Robert Miner  
(405) 323-6820

Mission of Hope  
1804 S. Perkins Road  
Stillwater, OK 74074  
Mary Ruth Anderson  
(405) 624-3671

Opportunities, Inc.  
Rt. 2, Box 47A  
Watonga, OK 73772  
Russell L. Morrison  
(405) 623-2545

Peachtree Landing, Inc.  
105 Hazel  
Ponca City, OK 74602  
Carmelita Westbrook  
(405) 762-3208

Project Bethel  
4102 N. Council Road  
Bethany, OK 73008  
Ted Bratcher  
(405) 789-1673

Reach Out, Inc.  
Rt. 3, Box 232 A  
Anadarko, OK 73005  
Norma Carter  
(405) 654-2090  
(405) 247-7400

Red Rock BHS Community Housing  
4400 N. Lincoln Blvd  
Oklahoma City, OK 73107  
Suzanne Williams  
(405) 425-0317

Resurrection House  
125 Ninth Street  
Chickasha, OK 73018  
Kent Hibbard  
(405) 225-5413

Ribbon of Blue

<http://www.ohfa.org/OHFA/new/Special/homelessshelters.htm>

7/9/2009

1202 W. Archer  
Tulsa, OK 74122  
Allen Sanderson  
(918) 584-1194

Salvation Army  
318 East Hayes  
P.O. Box 1092  
Norman, OK 73070  
Capt. Keith Boalt  
(405) 364-9910

Salvation Army  
1306 SW E Avenue  
Lawton, OK 73501  
Capt. John Murphy  
(580) 355-1802

Salvation Army  
516 N. Independence  
Enid, OK 73702  
Capt. Chris Flanagan  
(405) 237-1910

Salvation Army  
312 W. Brady  
Tulsa, OK 74103  
Jon Wallace  
(918) 582-7201 x.530

Salvation Army  
P.O. Box AA  
Muskogee, OK 74402  
Captain Nita Caldwell  
(918) 682-3384

Salvation Army  
311 SW Fifth  
P.O. Box 25516  
Oklahoma City, OK 73125  
Antoinette Hysmith-Hinton  
(405) 270-7844

Salvation Army  
210 E. 9th Street  
Shawnee, OK 74802  
Frances Mastin  
(405) 273-0941

Salvation Army Lodge  
P.O. Box 1483  
Ardmore, OK 73402  
Capt. Vernon Doby  
(405) 223-6176

Salvation Army Transient Lodge  
P.O. Box 549  
Ponca City, OK 74602

Capt. Harvey Adams  
(405) 762-7501

Shelter for Friends  
P.O. Box 5537  
Norman, OK 73070  
Elaine Hunter  
(405) 360-4954

Stephens Co. Veterans Home  
1004 N. 5th Street  
Duncan, OK 73533  
Renee Myers  
(405) 252-8162

The House of Hope  
805 N. Bock  
Broken Bow, OK 74728  
Olin Hill  
(405) 584-2255

Tulsa Day Center for Homeless  
415 W. Archer  
Tulsa, OK 74103  
Sandra Holden  
(405) 583-5588

Tulsa Action Group  
523 N. Boulder  
Tulsa, OK 74103  
Woody Powell  
(918) 592-2705

Tulsa County Emergency Shelter  
2401 Charles Page Blvd.  
Tulsa, OK 74106  
Linda Johnston  
(918) 596-5588

Tulsa Denver Project  
506 Fairview  
Tulsa, OK 74106  
Amber West

VITAL  
1140 NW 32nd Street  
Oklahoma City, OK 73102  
Charlotte Scaife  
(405) 528-9709

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Oklahoma Housing Finance Agency  
100 NW 63rd Street, Suite 200, Oklahoma City, OK 73116  
Mailing Address: P. O. Box 26720, Oklahoma City, OK 73126-0720

<http://www.ohfa.org/OHFA/new/Special/homelessshelters.htm>

7/9/2009

**EXHIBIT "A"**

**Inventory of Desired Items From the Donald A. Roush Army Reserve Center  
For Surplus to the Mission House, Inc.**

Item Description	Identifying Number
Bayonne Stainless Hot Table 220/60-3	7310-011141525
Vulcan Fryer 759400 S13991-000-B4	8504029
Wolf Grill & Oven MN: FS-0-27-FT36	13991-000-B84
Garlano Stove & Oven MN: 44-4-OR	1LA400-86-C5219
Hobart Potato Peeler	None
Hobart Mixer MN:6206	8841-C0-36
Scotsman Icemaker MN: CAM500AE-10	4110-80-058-1481
Coffee Maker	KD3883
Stainless 4 ft. Role Around Table	None
Stainless Salvator 500	8952
Overhead Vent	None
2 - Stainless Shelves	None
Stainless 10 ft. Double Sink	None
Champion Dishwasher MN: 1KAD	69592
Shever	None
Modine Heater	None
CRC MN: C26F525	B8532390
McCall Get Key	None
Stainless 6 Ft. Rolling Table w/ Rack	None
Globe Slicer MN: 725-MG84	731253
Jusser Jet Spray	None
Toaster MN: AT10	951-001
Bayonne MN:CPM-60	931
Stainless 2 Ft. 24" High Table	None
2 - Stainless 2 Ft. Rolling Tables	None

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MISSION HOUSE, INC.

PO Box 1522  
300 South 7th Street  
Clinton, Oklahoma 73601

(580) 323-6820



**Dear Mr. Bottom,**

**September 12, 2006**

**In regards to your letter on September 05, 2006 regarding the Donald Roush U.S. Army Reserve Center, the Mission House appreciates your consideration on the building for use as a homeless shelter. After due consideration of the area we do not feel that we can use this facility as a homeless shelter.**

**We do however have a need for the stainless steel kitchen equipment and dining room tables. In 2005 we served 13,694 meals, provided 3,690 beds and assisted 25,583 people in our area. We could greatly use the kitchen and dining room equipment.**

**Sincerely yours,  
Don Bishop (director)**

A handwritten signature in black ink, appearing to read "Don Bishop". The signature is written in a cursive style with a long horizontal stroke at the end.

**Bob Leonard (president)**

A handwritten signature in black ink, appearing to read "Bob Leonard". The signature is written in a cursive style with a long horizontal stroke at the end.

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MISSION HOUSE, INC.

P.O. Box 1522  
300 South 7th Street  
Clinton Oklahoma 73601

(580) 323-6820



October 30, 2007

Grayson Bottoms  
City Manager, City of Clinton

Mr. Bottoms,

This letter is to request the kitchen equipment in the Roush Army Reserve Center, Clinton, Oklahoma. We will use the equipment to upgrade our Mission House kitchen to better serve the hungry in our community.

In 2006 the Mission House, Inc. provided assistance to 19,539 individuals in the forms of meals, temporary shelter, food boxes and emergency utility assistance; serving 13,091 meals and providing night lodging to 5,147 individuals.

In our estimation, our programs reach 75% of the homeless population of Custer County.

All of our programs are funded with personal donations, church donations, annual bell ringing and sales from our "Wear It Again Store" and "Wear It Again Warehouse" locations. We receive no Federal, State or Local funding.

**Our programs to the homeless and needy include:**

Providing housing for transit and local needy people at our dormitory-style shelter with 37 beds available.

Providing free food boxes, clothing, furniture and household items to those who cannot afford such.

Maintaining feeding program at our kitchen located at 300 S. 7<sup>th</sup> Street; serving 2 meals per day, 365 days per year to any who ask.

Providing free fans in summer and free blankets in winter for needy individuals.

Provide emergency utility assistance through the administration of the "Salvation Army" and "Ministerial Alliance Benevolence Fund" in Western Oklahoma.

Help with prescriptions for those who cannot afford necessary medications.

Provide school supplies to needy children, when unavailable elsewhere.

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Furnish transportation for medical and personal emergencies to those without vehicles.

Provide gasoline & small repairs to stranded motorists.

In-House and Out-of-House work programs for those homeless residing in our shelter.

Work with area Courts to house and obtain work for parolees, persons in drug program and community service sentences.

Providing Traditional and Christian counseling to those who request.

Supply Holiday food boxes to needy families (Thanksgiving and Christmas).

Provide diapers and formula to DHS clients, as needed.

**Our programs to assist the homeless toward self-sufficiency include:**

A site for weekly Alcoholic and Narcotics Anonymous meetings

Provide inexpensive clothing, household and furniture items to low-income individuals and families through our "Wear It Again Store" and "Wear It Again Warehouse" locations.

Assist with locating and securing employment for individuals re-entering the community.

Provide classes in: Parenting, Money Management, Alcoholic and Drug Rehabilitation, Anger Management and Self-Esteem.

Sincerely,



Robert D. Leonard, President  
Board of Directors

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**Debora Glasgow**

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**From:** Gathers, Sherwana [Sherwana.Gathers@okdhs.org]  
**Sent:** Monday, June 29, 2009 3:58 PM  
**To:** debora@swoda.org  
**Subject:** Army reserve center

Custer County Department of Human Services does not provide housing to the homeless in our county. We have no interest in the Army Reserve Center located near Opal Street in Clinton. We have no objection to the City of Clinton gaining possession of this property.

Respectfully,

*Sherwana Gathers  
Custer/Dewey County Director  
190 S 31<sup>st</sup>  
Clinton, OK 73601  
580-331-1900 or 1-800-572-6846*

Even a mosquito doesn't get a slap on the back until it starts to work. Dr. Eugene Swearingen Work hard so God can say to you, "Well done." Be a good workman, one does not need to be ashamed when God examines your work. 2 Timothy 2:15

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**Debora Glasgow**

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**From:** Cody Farmer [codyfarmer@sbcglobal.net]  
**Sent:** Wednesday, July 08, 2009 9:56 AM  
**To:** debora@swoda.org  
**Subject:** Armory

MCYS opened a shelter for homeless children April of 2008. The commitment we made to updating the building we are in does not allow us to look elsewhere at this time. Also, the current state of the economy is not a fit for expansion. Thank you for your time.

Cody Farmer  
Executive Director  
Multi-County Youth Services  
580.323.3322

"If you don't like something, change it. If you can't change it, change your attitude." Maya Angelou

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**Debora Glasgow**

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**From:** Action Associates, Inc. [action-clinton@omega1w.net]  
**Sent:** Wednesday, July 08, 2009 12:26 PM  
**To:** debora@swoda.org  
**Subject:** not homeless shelter



***ACTION ASSOCIATES, INC.***

**Crisis Hotline 580.323.2604**

**Sherry Clinton, Executive Director**

**Office phone: 580.323.8704 / 580.323.8700**

**Fax: 580.323.4364**

**Email: action-clinton@omega1w.net**

P.O. Box 1534, 2500 S. State HWY 183

Clinton, Oklahoma 73601

Serving an 8 county area in Western Oklahoma

Clinton & Elk City United Fund Agency

Debora, we are not a homeless shelter provider. We are under the Attorney Generals' Office of Oklahoma. We are only allowed to take in victims of Domestic Violence, Sexual Assault and Stalking. If someone were homeless and one of these events happened to them, then they could come into our shelter. Otherwise not. We have no interest in the facility you spoke of.

Sincerely,.

Sherry Clinton  
Executive Director

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**Red Rock**  
Behavioral Health Services  
Western Region

94 North 31<sup>st</sup> Street  
Clinton, OK 73601  
(580) 323-6021

3080 West Third  
Elk City, OK 73648  
(580) 225-5136

216 West A Street  
Watonga, OK 73772  
(580) 623-7199



July 17, 2009

City of Clinton  
Attention: Debora Glasgow  
Clinton, Ok 73601

RE: Clinton Surplus Property

Dear Ms. Glasgow:

I understand that the City of Clinton is interested in property that has been declared surplus and has requested input from community agencies that provide homeless assistance.

Red Rock is a not for profit, private community mental health center. We first received a HUD grant to provide transitional housing for the homeless with a mental illness and/or substance abuse issues in 2003. Westhaven Transitional Housing program was established with a capacity for five (5) individuals in the City of Clinton. This program provides transitional housing including food and clothing; case management; twenty-four hour supervision; medical and dental; mental health treatment; substance abuse treatment and referrals; psychiatric services; financial and case management assistance in transitioning to independent living.

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When initially contacted by HUD concerning our interest in this property, Red Rock had an interest in the possibility of using this property to serve a population of homeless individuals that need emergency shelter but due to their mental illness and medication requirements, have no options in this rural area. The available shelter does not accept these people which leave a gap in our continuum of care.

Unfortunately, Red Rock currently has no funding to develop this property to meet the homeless needs that have been identified in our area. It is not feasible for Red Rock to use this surplus property.

If you have any further questions, please feel free to call 580-323-6021 for Patty Adams, extension 2203 or Jason Cornelius, extension 2215.

Sincerely,



Patty Adams, MS, LPC  
Regional Director  
94 North 31<sup>st</sup>  
Clinton, OK 73601  
Email: [pattya@red-rock.com](mailto:pattya@red-rock.com)

Point in Time  
Jan 29, 2009

✓ Mission	17 adults - Clinton, OK
Westhaven	3 adults
✓ Clinton P.D.	0 - Clinton, OK
✓ Multi-County Youth	4 children - Clinton, OK
✓ Action Assoc	7 adults 5 children - Clinton, OK
Weatherford P.D.	0
Weatherford	4 adults
Custer County Sheriff	0
✓ Red Rock BHS (Clinton)	5 adults 7 children (couch homeless) - Clinton, OK
Watonga Red Rock BHS	1 adult
Opportunities Treatment	0
✓ Integris Clinton Hosp	0 - Clinton, OK
Weatherford Hosp	0
Blaine County Health	0
Blaine County DHS	0

<b>Part 1: Homeless Population</b>	<b>In Emergency Shelter</b>	<b>In Transitional Housing</b>	<b>Unsheltered</b>	<b>Permanent Supportive Housing</b>	<b>Total</b>
1. # of households with children	37	15	4	15	71
1.a. # persons in these households	84	51	19	15	169
2. # of households without children	145	26	32	12	215
2.a. # of persons in these households	59	20	6	85	170
<b>Total Persons (Add Lines 1a and 2a)</b>	77	53	6	100	236

<b>Part 2: Subpopulations</b>	<b>Sheltered</b>	<b>Unsheltered</b>	<b>Total</b>
Chronically Homeless			40
Severely Mentally Ill			53
Chronic Substance Abuse			54
Veterans			3
Persons with HIV/AIDS			0
Victims of Domestic Violence			27
Unaccompanied Youth (Under 18)			10

Sign-In-Public Workshop - 9-26-06 10:00 AM

Paul Brown                      city of Clinton                      445-7240  
Project coordinator

JAKE H. LEWIS                      JAKE Lewis Real Estate                      580-309-0741

GARY Hoffman                      Sawatzky Contracting                      580-772-5563

Lynn Boese                      Office of Economic Adjustments                      703-604-5134

Chris Jones                      Interbank                      (580) 323-5500



## **“ Community Involvement With BRAC”**

**Office of Economic Adjustment  
Office of the Secretary of Defense**

[www.oea.gov](http://www.oea.gov)



## **Office of Economic Adjustment Mission Statement**

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*The Office of Economic Adjustment shall directly, and in coordination with the other resources of the Federal Government, assist communities to:*

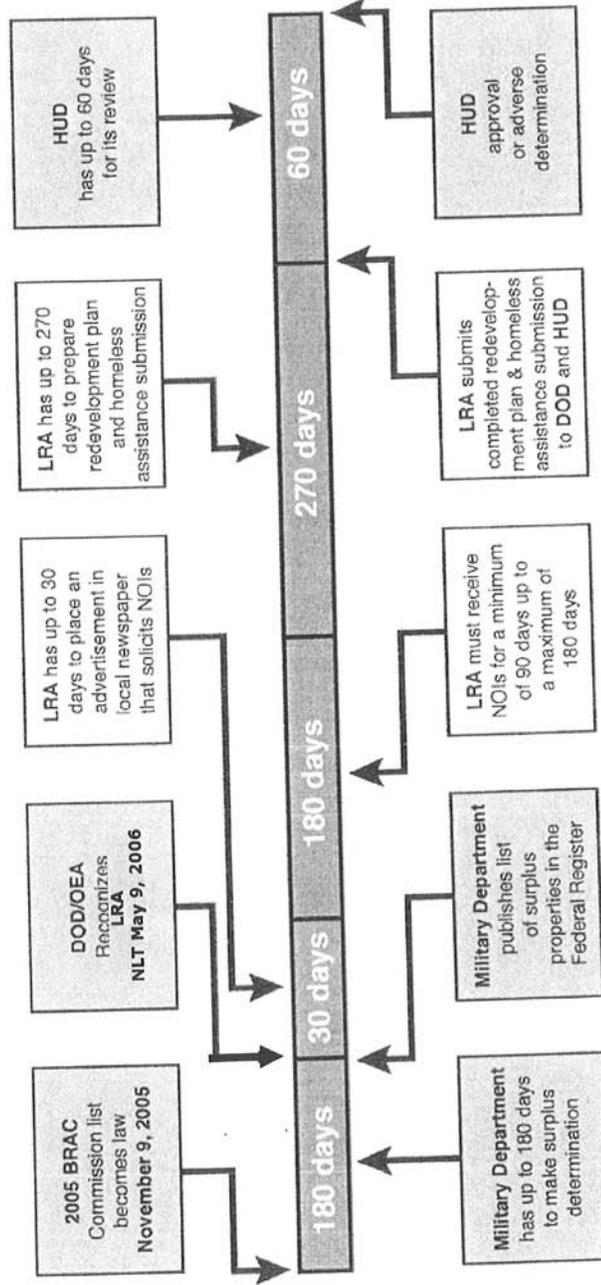
- 1. Plan and carry out responsive adjustment strategies;*
- 2. Capably engage the private sector in planning and reuse of surplus property; and*
- 3. Effectively partner with the Military Departments as they strive to implement BRAC actions in support of the Department's warfighting mission.*

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[www.oea.gov](http://www.oea.gov)



# BRAC 2005 Planning Timeline



www.oea.gov



# Community Adjustment Process

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## Step 1: Organize

- ✓ Organize affected community and interested parties.
- ✓ Create LRA, if desired. *City*
- ✓ Speak with one voice on behalf of the impacted community.
- ✓ Include stakeholders.

## Step 2: Plan

- ✓ Plan public or private development.
- ✓ Create economically/environmentally sustainable reuse plan.
- ✓ Achieve consensus on base redevelopment.

## Step 3: Implement

- ✓ Create jobs and or expand tax-base.
- ✓ Satisfy public reuse needs.
- ✓ Identify and obtain resources.
- ✓ Make infrastructure improvements.
- ✓ Develop marketing program.

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[www.oea.gov](http://www.oea.gov)

## Local Redevelopment Authority (LRA) Definition

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**(1) Pub. L. 101-510 defines a redevelopment authority in the case of an installation to be closed or realigned as:**

***“...any entity (including an entity established by a State or local government) recognized by the Secretary of Defense as the entity responsible for developing the redevelopment plan with respect to the installation or for directing the implementation of such plan.”***



## LRA Definition

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**(2) Pub. L 101-510 does not require formation of an LRA.**

*“Where none exists, the Military Departments are to consult on property reuse with the local government in whose jurisdiction the installation is wholly located or a local or State government agency designated for the purpose of consultation by the governor.”*

### **(3) LRA Structure**

*“the LRA should have broad-based membership including, but not limited to, representatives from those jurisdictions with zoning authority over the property.” [Regulation].*

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## **LRA Functions**

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- **Conduct outreach for homeless-assistance providers and other eligible recipients of public benefit property transfers.**
- **Provide leadership, prepare and build consensus for base redevelopment plan.**
- **Consult with Military Department on personal property disposal.**
- **Serve as single community point of contact.**
- **LRA determines uses; Military Department determines users.**

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## LRA Formation

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- **Excess DoD property recently screened for DoD and Federal interest, and may be available for reuse (Surplus determination).**
- **OEA Project Managers will coordinate with each community where excess property was screened regarding two potential paths:**
  - *Communities with an LRA and*
  - *Communities without an LRA.*
- **If LRA is desired, community must form and/or designate LRA and request OEA recognition.**
- **If request received, OEA will review LRA recognition request and recognize an LRA.**
- **LRA's are to be recognized NLT 9 May 2006 (to respond to Military Department Surplus Determination).**

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## Path 1: LRA

- **Military Departments begin federal property screening.**
- **Local community forms or designates LRA, with possible OEA assistance.**
- **Community submits written request for recognition to OEA.**
- **OEA, through Project Manager, conducts due diligence and reviews recognition request.**
- **OEA recognizes LRA and publishes in Federal Register and Local Newspaper (s) and coordinates with relevant Military Department.**
- **LRA conducts outreach to homeless-assistance providers and other eligible recipients of public benefit property transfers.**
- **LRA prepares redevelopment plan that balances needs of the homeless and economic development.**
- **LRA provides homeless submission, including redevelopment plan, to Secretary of Defense and Department of Housing and Urban Development (HUD).**
- **HUD reviews submission.**
- **Public benefit conveyances and negotiated sales to public entities are possible.**

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## Path 2: No LRA

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- **Military Department conducts outreach to homeless-assistance providers and other eligible recipients of public benefit property transfers.**
- **Military Department consults on property reuse with local government in whose jurisdiction installation is wholly located or local or State government agency designated for purpose of consultation by governor.**
- **Military Department considers needs of homeless assistance providers and other eligible recipients of public benefit property transfers—HUD reviews suitability of property for balancing homeless needs.**
- **Community planning and development control processes still apply (i.e. zoning).**

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## A Community Decision...

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- **Decision whether to form, designate and request recognition of an LRA is ultimately a *community decision.***

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## CONTACT INFORMATION

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### **Office of the Secretary of Defense**

Office of Economic Adjustment

Western Regional Office

1325 J Street, Suite 1500

Sacramento CA 95814

(916) 557-7365

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SIGN-IN SHEET  
LRA MEETING 10-19-06  
6:30 A.M.

Paul Brown

Larry Harris

~~Hans Klever~~

Sherry Klein

Lynn Norman

RON STEPHENSON

Supv-In LRA Meeting  
11-7-06

PAUL BROWN  
RON STEPHENSON  
Terry Hamm

Paul Brown  
~~Ronald P. Stephenson~~  
Terry Hamm  
Ch. Jones  
Hong Kluver  
Sherri Klein

CHRIS JONES  
Hong Kluver  
Sherri Klein

# Sign-in Sheet

Grayson Bottom  
City Manager City of Clinton (580) 323-0961

MAJ Mike Grimes  
Region Commander OKLA Hwy Patrol 405-425-201

CPT. JOHN HARRIS  
Zone Commander - OKLAHOMA HIGHWAY PATROL - (405) 425-770

Erin Adams  
President Clinton Chamber of Commerce 580-323-2222

2LT BRAD NEIDY 2225 Gary Blvd  
SUPERVISOR OKLA HIGHWAY PATROL TROOP H CLINTON  
580-323-2424

SSG JACOB SIMPSON  
Admin NCO B Btry 1/171 FA OKARNG  
580 323 4652

SFC WOODWARD MARSHALL (580) 323-4657  
Readiness NCO B Btry 1/171 FA (580) 445-6756

PAUL BROWN - 580-445-7240  
PROJECT COORDINATOR/CONSULTANT, LLC CITY OF CLINTON