

Final

**ENVIRONMENTAL ASSESSMENT
ESTABLISHMENT OF AN
ARMED FORCES RESERVE CENTER (AFRC)
SAN MARCOS, TEXAS
BRAC 2005**



Prepared for:

**Philip L. Hanrahan
Brigadier General, USAR
Commanding**

Prepared by:

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December 2008



Printed on Recycled Paper

FINAL

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ESTABLISHMENT OF AN
ARMED FORCES RESERVE CENTER (AFRC)
SAN MARCOS, TEXAS
BRAC 2005**

Prepared by:

U.S. ARMY CORPS OF ENGINEERS
MOBILE DISTRICT



BYRON G. JORNS
Colonel, Corps of Engineers
Commanding

Approved by:



PHILIP L. HANRAHAN
Brigadier General, USAR
Commanding

DEC 08 2008

**DRAFT
FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT
ESTABLISHMENT OF AN
ARMED FORCES RESERVE CENTER (AFRC)
SAN MARCOS, TEXAS
BRAC 2005**

The Defense Base Closure and Realignment (BRAC) Commission of 2005, in response to the Defense Base Closure and Realignment Act of 1990, as amended, recommended closing the U.S. Army Reserve Center (USARC) in San Marcos, Texas and relocation to a new Armed Forces Reserve Center (AFRC) in San Marcos, if the Army is able to acquire suitable land for the construction of the facilities.

Pursuant to the Council on Environmental Quality regulations (40 Code of Federal Regulations Parts 1500-1508) implementing the procedural provisions of the National Environmental Policy Act (NEPA), 42 U.S. Code Section 4321 et seq., as amended; 32 Code of Federal Regulations (CFR) Part 651 (Environmental Analysis of Army Actions), the U.S. Army Corps of Engineers, Mobile District, has prepared an Environmental Assessment (EA) and Draft Finding of No Significant Impact (FNSI), which addresses the proposed construction and operation of the AFRC in San Marcos, Texas.

Proposed Action

The Proposed Action is to establish a new 600-member AFRC at a site in southwest San Marcos to accommodate the units to be relocated from the existing USARC. A new 131,154-square foot (SF) building; 19,153 SF Vehicle Maintenance Shop; a 3,008 SF Organization Storage Unit; and 26,987 SF parking lot would be constructed. The new facility would provide administrative, assembly, educational, storage vault, weapons simulators and physical fitness training facilities to accommodate two U.S. Army Reserve (USAR) and up to four Texas Army National Guard (ARNG) units from San Marcos, Sequin and New Braunfels, Texas, should the state decide to relocate these units. The new AFRC is proposed to be constructed on a 19.13-acre parcel on Clovis Barker Road, approximately 0.25 mile east of Interstate 35 (I-35).

Alternatives Considered

General siting criteria include consideration of compatibility between the functions to be performed and the land use designation for the site, adequacy of the site for the function required, proximity to related activities, distance from incompatible activities, availability and capacity of roads, efficient use of property, development density, potential future mission requirements, and special site characteristics. Specific criteria require that the site is a minimum size of 12 acres, a rectangular-shaped parcel and has a minimum side length of 500 feet. The latter is required to ensure sufficient size to comply with anti-terrorism/force protection (AT/FP) requirements for 200-foot wide setbacks.

Six other alternative sites were evaluated using these criteria, through an independent Available Site Identification and Validation (ASIV) study. However, these sites were eliminated from further consideration because the majority of the site was located within a 100-year floodplain or the site was removed from the real estate market prior to completion of the ASIV.

No other action alternatives were considered during the preparation of this EA. Other schedules, expansion of the existing facility, and leasing of commercial or private facilities were considered, but eliminated from detailed analyses.

The No Action Alternative has also been carried forward throughout the EA to serve as a baseline for comparison to the other alternatives.

Factors Considered In Determining That No Environmental Impact Statement is Required

Implementation of the Proposed Action at the preferred site would result in minor, permanent effects on vegetation, wildlife, soils, aesthetics, and land use. The Proposed Action would cause the permanent conversion of up to 14 acres of cropland to hard surfaces and buildings and remove this land from further biological productivity and other uses. Because the preferred location has been disturbed by past and current agricultural activities, and thus provides limited wildlife habitat, the loss of 14 acres would be considered insignificant. In addition, the remaining 5 acres would be removed from potential private development or agricultural production. There are currently no plans for these additional acres, so it is anticipated that these areas will be allowed to revegetate naturally. The soils at the preferred site are considered prime and unique farmland soils; the loss of 14 acres would not be a significant impact, given the vast amount of acreage containing the same soil type found within the project region.

Temporary increases of vehicle traffic would be expected during the construction period, particularly along the I-35 and its frontage roads, Clovis Barker Road, and Highway 123, as construction crews commute to the project site. Permanent increases in traffic would occur along these roads during the operation of the AFRC; however, most of these increases would occur during training activities, which would be scheduled primarily on weekends. Daily increases in vehicle traffic would be expected to be less than 15 vehicle trips per weekday and up to 100 vehicle trips on the training weekends. Therefore, the operation of the AFRC would result in minor (less than 1 percent) long-term increases in traffic.

In addition, temporary and insignificant adverse effects on air quality, noise, soil erosion/sedimentation, and utilities would occur during the construction period. No violations of the region's air or water quality standards would be expected. Hays County is considered in attainment for all priority pollutants. Emissions expected to be generated during construction are well below the *de minimis* thresholds. Best management practices would be implemented to ensure stormwater during and after construction is controlled and downstream sedimentation is either eliminated or is negligible.

No impacts would occur on Federal or state protected species, cultural resources, water quality or supply, or hazardous waste facilities. The USAR would incorporate sustainability and greenings practices in daily operations through cost-effective waste reduction, recycling of reusable materials and purchase of items produced using recovered materials, in compliance with Executive Order 13148.

Slight benefits for local and regional employment and personal income would be expected during the construction period; however, since the majority of the realigned units would come from less than 3 miles away, no long-term significant adverse impacts on the region's economy would be expected to occur.

The cumulative effects of the Proposed Action and other planned or reasonably foreseeable projects in the project region would also be considered insignificant. The City of San Marcos

currently has no plans for development or improvements at the preferred site or surrounding area. Local expenditures required by the proposed AFRC and other construction projects would result in moderate beneficial impacts in the project region within the next 3 years. The economy of the Round Rock-Austin Metropolitan Statistical Area is large enough such that any additional employment, sales volumes, income or taxes generated by these activities would not adversely affect the local economy.

Conclusions

Based on information gathered and presented in the EA, it has been determined that the Proposed Action would have no significant direct, indirect or cumulative adverse impacts on the quality of the natural and human environment. Consequently, an Environmental Impact Statement is not required and will not be prepared.

Public Comment

Interested parties are invited to review and comment on the EA and draft FNSI within 30 days of publication of the Notice of Availability, which is scheduled to occur on 14 December 2008. Comments and requests for copies should be addressed to Mr. James Wheeler II, Chief, Environmental Division, 90th Regional Readiness Command, 8000 Camp Robinson Road, North Little Rock, Arkansas 72118-2205 or by phone at 501-771-7992. A limited number of copies of the EA are available to fill single copy requests. The EA is available for review at the San Marcos Public Library, 625 E. Hopkins Street, San Marcos, Texas 78666 (512-393-8200). The EA will also be available for review on-line at the following URL address: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

Philip L. Hanrahan, Brigadier General
U.S. Army Reserve, Commanding

Date

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

TITLE OF PROPOSED ACTION ALTERNATIVE: Establishment of an Armed Forces Reserve Center (AFRC), San Marcos, Texas, BRAC 2005

AFFECTED JURISDICTION: Hays County, Texas

PREPARED BY: Byron G. Jorns, Colonel, Corps of Engineers, Mobile District, Commanding

TECHNICAL ASSISTANCE FROM: Gulf South Research Corporation

APPROVED BY: Philip L. Hanrahan, Brigadier General, US Army Reserve, Commanding

ABSTRACT: This Environmental Assessment (EA) addresses the potential effects of the proposed establishment of a new Armed Forces Reserve Center (AFRC) in San Marcos, Texas, as directed by the Defense Base Closure and Realignment Commission's recommendation. The existing U.S. Army Reserve Center (USARC) would be closed and the units would be relocated to the new AFRC. The Proposed Action Alternative would accommodate up to 600 military and civilian personnel at the new AFRC during training activities if all U.S. Army Reserve (USAR) units assigned to the AFRC conduct training exercise simultaneously. To accommodate the proposed AFRC, a new 108,633-square foot building is proposed to be constructed. In addition, parking, vehicle and equipment maintenance, stormwater retention ponds and storage facilities would also be constructed. The total building space proposed for construction at the AFRC is 131,154 square feet. The construction would permanently convert approximately 14 acres of agricultural crop land to hard surfaces. No long-term or significant impacts on protected species, cultural resources, water quality, or socioeconomic resources would occur as a result of the Proposed Action Alternative. Temporary and insignificant impacts on air quality and noise would occur during construction activities. Alteration of 14 acres of Branyon clay soils would be considered an insignificant, but long-term impact on prime or unique farmland soils. Traffic patterns at the new site would be slightly altered by the proposed construction and operation of the AFRC. No other viable sites or alternatives were identified during the preparation of the EA.

REVIEW PERIOD: The EA and draft Finding of No Significant Impact are available for review for a period of 30 days. Copies of this document can be obtained from Mr. James Wheeler II, Chief, Environmental Division, 90th Regional Readiness Command, 8000 Camp Robinson Road, North Little Rock, Arkansas 72118-2205 or by phone at 501-771-7992. Copies are also available for review at the San Marcos Public Library, 625 E. Hopkins Street, San Marcos, Texas 78666 (512-393-8200), and on-line at the following URL Address: http://hqda.army.mil/brac/env_ea_review.htm.

Written comments must be submitted to Mr. Wheeler no later than 13 January 2009.

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**EXECUTIVE SUMMARY
ENVIRONMENTAL ASSESSMENT
ESTABLISHMENT OF AN
ARMED FORCES RESERVE CENTER (AFRC)
SAN MARCOS, TEXAS
BRAC 2005**

Introduction: In accordance with the National Environmental Policy Act of 1969 (NEPA), the United States (U.S.) Army Corps of Engineers (USACE), Mobile District has prepared this Environmental Assessment (EA) for the establishment of an Armed Forces Reserve Center (AFRC) in San Marcos, Hays County, Texas. The new AFRC will accommodate troops to be relocated from the existing U.S. Army Reserve Center (USARC), which is scheduled to be closed. This EA discusses the potential environmental effects of the proposed construction and operation of the AFRC on the human and natural environment at and surrounding the preferred site in San Marcos.

Background/Setting: The existing USARC is 45 years old and contains approximately 19,421 square feet of training and maintenance space. The existing USARC is located near downtown San Marcos, and is surrounded by commercial development on all four sides, leaving limited room for expansion. The preferred site for the establishment of a new AFRC is located approximately 3 miles southwest of the existing USARC. This site is currently used for crop production (corn and cotton). Surrounding development includes private warehouses, an industrial park, hotels, and pasture/agricultural fields.

Proposed Action Alternative: The establishment of a new AFRC in San Marcos, Texas is required by the Defense Base Closure and Realignment Act of 1990 (BRAC), as amended, and the recommendations made by the Defense Base Closure and Realignment Commission of 2005 (BRAC Commission). The BRAC Commission recommended the closure of the existing USARC. Seven sites were evaluated for the establishment of the AFRC in San Marcos, Texas, but only one was identified as viable and, thus, it is the preferred site. Establishment of the AFRC at this preferred site would require the purchase of approximately 19 acres from private ownership.

The new AFRC would comprise approximately 131,154 square feet of total building space, including multi-use classrooms, library, vault, weapons simulator, and maintenance and storage facilities. An additional 26,987 square feet would be developed into parking lots. The entire facility would require approximately 14 acres; stormwater retention ponds would also be constructed within these 14 acres. No additional expansion to or demands on training areas or airspace would be required for the Proposed Action Alternative. No additional weapons systems would be associated with the establishment or operation of the AFRC.

Alternatives: General siting criteria include consideration of compatibility between the functions to be performed and the land use designation for the site, adequacy of the site for the function required, proximity to related activities, distance from incompatible activities, availability and capacity of roads, efficient use of property, development density, potential future mission requirements, and special site characteristics. Specific criteria require that the site is a minimum size of 12 acres, a rectangular-shaped parcel and has a minimum side length of 500 feet. The latter is required to ensure sufficient size to comply with anti-terrorism/force protection (AT/FP) requirements of 200-foot wide setbacks.

Other alternatives relative to scheduling, using other existing facilities, or leasing space from commercial/private entities are not considered viable and, thus, were not addressed in the EA. Use of off-site leased space to meet the AFRC's requirements would involve several major drawbacks. AT/FP policies specify certain facilities characteristics, such as physical security features. Use of leased space in the private sector would be expected to hinder these protection policies, would adversely affect command and control functions, result in higher operational costs, and impair efficient use of resources.

Six other sites were evaluated, but were eliminated from further consideration because a large portion of the site was within a 100-year floodplain, or the site was removed from the real estate market prior to the completion of the evaluation.

Environmental Consequences: Construction of the AFRC facility at the preferred site would permanently convert up to 14 acres of agricultural cropland to impervious surfaces. Construction would cause temporary and insignificant increases of noise and air emissions. Ambient conditions would return upon completion of the construction activities. Traffic would be slightly increased on surface streets in and around the preferred site. The daily increase is expected to be less than 0.1 percent; weekend traffic would increase by about 0.6 percent over the current average daily vehicle trips. The loss of productivity on 14 acres of prime and unique soils would be a permanent, but insignificant impact, since the Branyon clay soils are very common throughout Hays County. Socioeconomic resources would experience beneficial, but insignificant, long-term impacts due to the expenditures associated with the construction and operation of the AFRC. There would be a net loss of real estate tax revenues due to the acquisition of the land by the Federal Government. No impacts would occur on cultural resources, protected species, or water quality and supply. A small portion of the project site is located within the 100-year floodplain; however, no structures would be constructed within the floodplain that could impede flows or increase flood frequencies, surface water elevations, flood risks, flow velocities, or flood duration. Insignificant impacts on wildlife habitat and populations, aesthetic and visual resources, and utilities would occur as a result of the establishment of the AFRC at the proposed site.

Best Management Practices (BMPs): All temporarily disturbed sites would be re-seeded as soon as practicable after completion of the construction activities to control erosion and sedimentation. For those areas that will not be landscaped or routinely maintained, native vegetation seeds would be used for re-seeding activities, in accordance with Section 7(a)(1) of the Endangered Species Act. A Stormwater Pollution Prevention Plan (SWPPP) and Notice of Intent will need to be prepared and submitted prior to construction. The SWPPP would identify best management practices (BMP) to be implemented for erosion and sedimentation control during construction. If straw bales are used, weed seed-free straw would be used to avoid introduction or expansion of invasive or noxious weeds, to the extent practicable. In compliance with Executive Order 13148, the construction will adhere to the LEED Silver standards for energy conservation. In addition, USAR would incorporate sustainability and greening practices in daily operations through cost-effective waste reduction, recycling of reusable materials and purchase of items produced using recovered materials.

Wetting solutions, including water, would be applied to disturbed soils within the construction site to control fugitive dust. All construction equipment and material would be properly maintained and stored to reduce air emissions and avoid potential spills of hazardous materials.

If the breeding/nesting season for migratory birds can not be avoided during the initial grubbing and clearing of the site, breeding bird pairs and nests would need to be identified and avoided, in accordance with the Migratory Bird Treaty Act.

Conclusion: The data presented in the EA documents that the best available site for the proposed construction and operation of the AFRC is at the preferred site and that development of this site would result in insignificant adverse impacts on the area's human and natural environment.

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TABLE OF CONTENTS

1.0	Purpose, Need, and Scope	1
1.1	Introduction.....	1
1.2	Purpose and Need	1
1.3	Scope	2
1.4	Public Involvement	4
1.5	Regulatory Framework	4
2.0	Proposed Action	9
2.1	Introduction.....	9
2.2	Force Structure.....	9
2.3	Garrison Facilities.....	9
2.4	Training Facilities and Airspace.....	11
2.5	Weapon Systems	11
2.6	Schedule	11
3.0	Alternatives	13
3.1	Introduction.....	13
3.2	Development of Alternatives	13
3.2.1	Means to Accommodate Realigned Units.....	13
3.2.2	Siting of New Construction	13
3.2.3	Schedule.....	14
3.3	Alternatives Eliminated from Further Consideration	14
3.3.1	Use of Leased Facilities to Accommodate Relocated Units	14
3.3.2	Use of Existing USARC to Accommodate Relocated Units.....	14
3.3.3	Other Construction Sites.....	14
3.3.4	Schedule.....	14
3.4	No Action Alternative	16
4.0	Affected Environment and Consequences	17
4.1	Introduction.....	17
4.2	Land Use	18
4.2.1	Affected Environment	18
4.2.1.1	Regional Setting.....	18
4.2.1.2	Installation Land Use	18
4.2.1.3	Current and Planned Development.....	18
4.2.2	Environmental Consequences.....	18
4.2.2.1	Proposed Action Alternative.....	18
4.2.2.2	No Action Alternative	18
4.3	Aesthetics and Visual Resources	19
4.3.1	Affected Environment	19
4.3.2	Environmental Consequences.....	19
4.3.2.1	Proposed Action Alternative.....	19
4.3.2.2	No Action Alternative	19
4.4	Air Quality	19
4.4.1	Affected Environment	19
4.4.2	Environmental Consequences.....	20
4.4.2.1	Proposed Action Alternative.....	20
4.4.2.2	No Action Alternative	22
4.5	Noise	22

4.5.1	Affected Environment	22
4.5.2	Environmental Consequences.....	23
	4.5.2.1 Proposed Action Alternative.....	23
	4.5.2.2 No Action Alternative	24
4.6	Soil Resources	24
4.6.1	Affected Environment	24
4.6.2	Environmental Consequences.....	27
	4.6.2.1 Proposed Action Alternative.....	27
	4.6.2.2 No Action Alternative	27
4.7	Water Resources.....	27
4.7.1	Affected Environment	27
	4.7.1.1 Surface Water	27
	4.7.1.2 Hydrogeology/Groundwater	27
	4.7.1.3 Floodplain	29
4.7.2	Environmental Consequences.....	29
	4.7.2.1 Proposed Action Alternative.....	29
	4.7.2.2 No Action Alternative	31
4.8	Biological Resources	31
4.8.1	Affected Environment	31
	4.8.1.1 Vegetation.....	31
	4.8.1.2 Wildlife	32
	4.8.1.3 Sensitive Species	32
	4.8.1.3.1 Federal.....	32
	4.8.1.3.2 State.....	34
	4.8.1.4 Wetlands.....	34
4.8.2	Environmental Consequences.....	34
	4.8.2.1 Proposed Action Alternative	34
	4.8.2.2 No Action Alternative	35
4.9	Cultural Resources	35
4.9.1	Affected Environment	35
	4.9.1.1 Cultural Overview	35
4.9.2	Environmental Consequences.....	35
	4.9.2.1 Proposed Action Alternative	35
	4.9.2.2 No Action Alternative	36
4.10	Socioeconomic Resources	36
4.10.1	Affected Environment	36
	4.10.1.1 Population.....	36
	4.10.1.2 Income and Employment.....	37
	4.10.1.3 Housing.....	38
	4.10.1.4 Environmental Justice.....	39
	4.10.1.5 Protection of Children	39
4.10.2	Environmental Consequences.....	39
	4.10.2.1 Proposed Action Alternative	39
	4.10.2.2 No Action Alternative	40
4.11	Transportation	40
4.11.1	Affected Environment	40
4.11.2	Environmental Consequences.....	42
	4.11.2.1 Proposed Action Alternative	42
	4.11.2.2 No Action Alternative	42
4.12	Utilities.....	42
4.12.1	Affected Environment	42

4.12.1.1	Potable Water Supply	42
4.12.1.2	Wastewater System.....	42
4.12.1.3	Stormwater System	42
4.12.1.4	Electric and Gas	42
4.12.2	Environmental Consequences.....	43
4.12.2.1	Proposed Action Alternative	43
4.12.2.2	No Action Alternative	43
4.13	Hazardous and Toxic Substances.....	43
4.13.1	Affected Environment	43
4.13.2	Environmental Consequences.....	43
4.13.2.1	Proposed Action Alternative	43
4.13.2.2	No Action Alternative	44
4.14	Cumulative Effects Summary	44
4.15	Best Management Practices (BMPs).....	44
4.15.1	Vegetation and Wildlife	45
4.15.2	Air Quality	45
4.15.3	Water Resources	45
4.15.4	Cultural Resources	45
4.15.5	Hazardous and Toxic Substances	45
5.0	Findings and Conclusions	47
5.1	Findings.....	47
5.1.1	Consequences of the Proposed Action Alternative	47
5.1.2	Consequences of the No Action Alternative	47
5.2	Conclusions.....	47
6.0	References.....	49
7.0	List of Preparers.....	53
8.0	Acronyms and Abbreviations	55

LIST OF TABLES

Table 1-1. Summary of Relevant Regulations Including 5

Table 2-1. Proposed Construction Projects 11

Table 2-2. Tentative Dates for Completion of Major Items Associated with Relocation of Units at San Marcos, Texas 11

Table 4-1. National Ambient Air Quality Standards 20

Table 4-2. Hays County Total Air Emissions (tons/year) from Construction Activities vs. *de minimis* Levels 21

Table 4-3. Hays County Total Air Emissions (tons/year) from AFRC Commuters vs. *de minimis* Levels 22

Table 4-4. A-Weighted (dBA) Sound Levels of Construction Equipment and Modeled Attenuation at Various Distances¹ 24

Table 4-5. Federally Listed Species Potentially Occurring Within Hays County, Texas 33

Table 4-6. State Listed Species Potentially Occurring Within Project Area in Hays County, Texas 34

Table 4-7. Population and Race 36

Table 4-8. 2006 Per Capita Personal Income (PCPI) 37

Table 4-9. Total Personal Income 37

Table 4-10. Total Number of Jobs and Employment 38

Table 4-11. 2005 Poverty and Median Income for the Nation, State of Texas, and Across the ROI 38

Table 4-12. Housing Units 39

Table 4-13. Population of Persons Younger than Eighteen Years Old 39

Table 5-1. Summary Matrix of Potential Impacts 48

LIST OF FIGURES

Figure 1-1. Vicinity Map 3

Figure 2-1. Project Site Map – Preferred Site 10

Figure 2-2. Conceptual Site Plan 12

Figure 3-1. Alternative Sites Eliminated from Consideration 15

Figure 4-1. Preferred Site with 65 dBA Construction Noise Contour 25

Figure 4-2. Preferred Site Soils Map 26

Figure 4-3. Major Streams near the Preferred Site 28

Figure 4-4. Floodplain Map 30

Figure 4-5. Transportation Map 41

LIST OF PHOTOGRAPHS

Photograph 4-1. Preferred Site Looking WSW from NE Corner (June 2008) 31

Photograph 4-2. Remnants of Harvested Corn at the Preferred Site (August 2008) 31

Photograph 4-3. Strip of Vegetation on the Eastern Edge of the Preferred Site 32

Photograph 4-4. Vegetated Mound in the Southwestern Corner of the Preferred Site 32

LIST OF APPENDICES

Appendix A. ASIV and Site Survey Report

Appendix B. Air Emission Calculations

Appendix C. Correspondence

Appendix D. Economic Impact Forecast System

SECTION 1.0
PURPOSE, NEED, AND SCOPE

**Environmental Assessment
Establishment of an
Armed Forces Reserve Center (AFRC)
San Marcos, Texas
BRAC 2005**

1.0 Purpose, Need, and Scope

1.1 Introduction

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended that certain actions occur at United States Army Reserve Center (USARC), San Marcos, Texas. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended (BRAC 2005).

The BRAC Commission recommended the closure of the San Marcos USARC and relocation to a new Armed Forces Reserve Center (AFRC) in San Marcos, Texas, and to accommodate the relocation of Texas Army National Guard (ARNG) units, if the state decides to relocate these units. To enable implementation of this recommendation, the Army proposes to provide necessary facilities to support the establishment of the AFRC and relocation of the units to the AFRC. This Environmental Assessment (EA) analyzes and documents environmental effects associated with the Army's Proposed Action in San Marcos, Texas. Details on the Proposed Action are presented later in Section 2.

1.2 Purpose and Need

The purpose of the Proposed Action is to implement the BRAC Commission's recommendation pertaining to the closure of the San Marcos USARC and relocation of the units to the new Armed Forces Reserve Center (AFRC) in San Marcos.

These actions are required to implement the BRAC Commission recommendations to realign and transform Reserve Component facilities in San Marcos, Texas. The Army defends the United States and its territories, supports National policies and objectives, and defeats nations responsible for aggression that endangers the peace and security of the United States. To carry out these tasks, the Army must adapt to changing world conditions and must improve its capabilities to respond to a variety of circumstances across the full spectrum of military operations.

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

1.3 Scope

This EA was developed in accordance with the National Environmental Policy Act (NEPA) of 1969 and implementing regulations issued by the President's Council on Environmental Quality (CEQ) and the Army. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

This EA identifies, documents, and evaluates environmental effects of the construction and operation of a new AFRC in San Marcos, Texas to accommodate the proposed relocation of units from the existing San Marcos USARC (Figure 1-1), which will be closed in accordance with BRAC 2005. The preferred site is located in the southwestern portion of the Round Rock-Austin Metropolitan Statistical Area (MSA), which was formerly known as the San Marcos-Austin MSA, in south central Texas. An interdisciplinary team of environmental scientists, biologists, planners, economists, engineers, archaeologists, historians, and military technicians have analyzed the Proposed Action and alternatives in light of existing conditions at the preferred site and identified relevant beneficial and adverse effects associated with the action. The Proposed Action is described in Section 2, and alternatives, including the No Action Alternative, are described in Section 3.0. Conditions existing as of 2008, considered to be the "baseline" conditions, are described in Section 4.0, Affected Environment and Environmental Consequences of the EA. The expected effects of the Proposed Action, also described in Section 4.0, are presented immediately following the description of baseline conditions for each environmental resource that are addressed in the EA. Section 4.0 also addresses the potential for cumulative effects, and mitigation measures are identified, where appropriate.

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

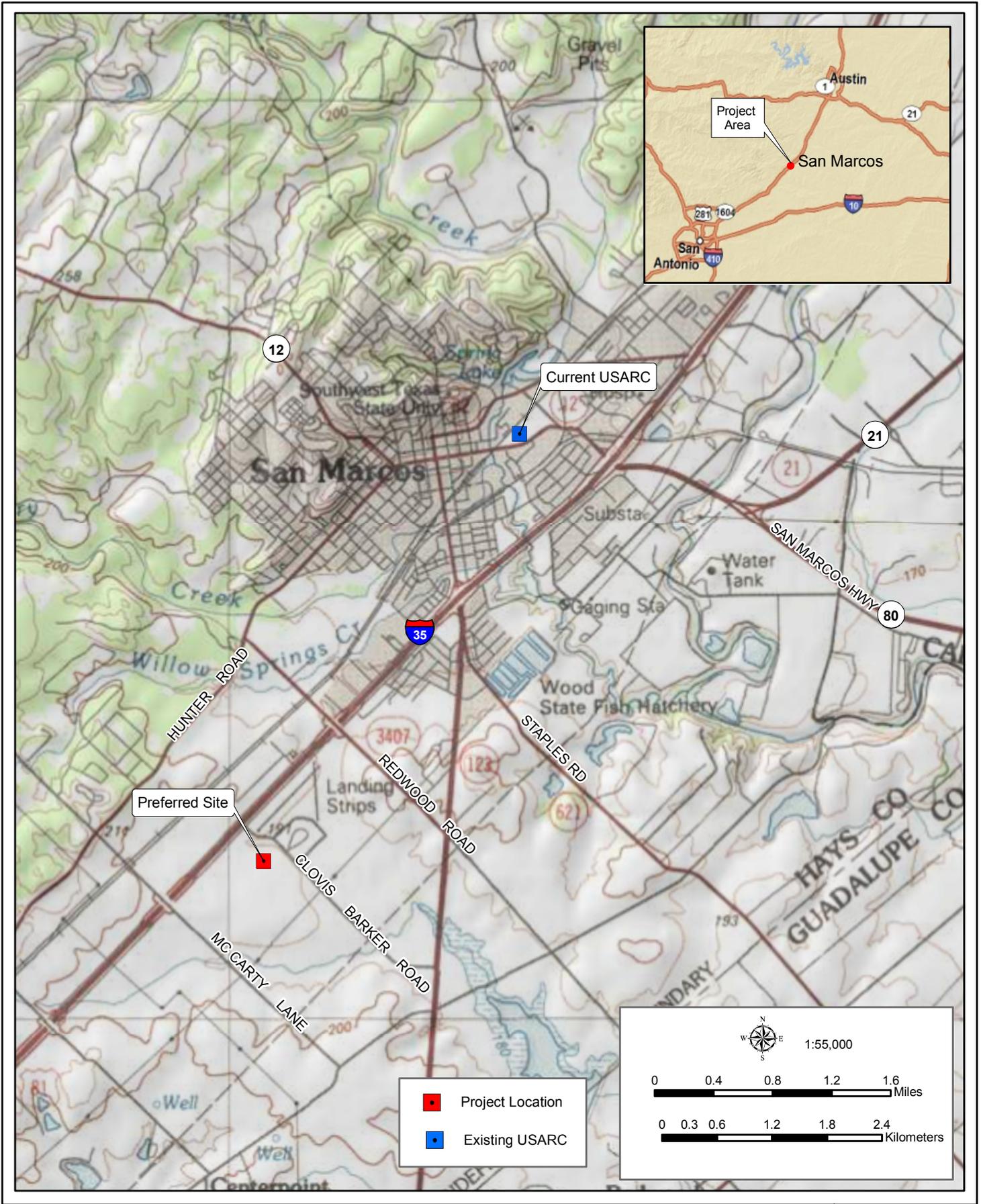


Figure 1-1: Vicinity Map



August 2008

1.4 Public Involvement

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

Public participation opportunities with respect to the EA and decision-making on the Proposed Action are guided by 32 CFR Part 651. Upon completion, the EA will be made available to the public for 30 days, along with a draft Finding of No Significant Impact (FNSI). A Notice of Availability for the EA will be published in the *San Marcos Daily Record* and *Austin American Statesman*. The EA will be available for review at local, public libraries and on-line at the following URL address: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. At the end of the 30-day public review period, the Army will consider any comments submitted by individuals, agencies, or organizations on the Proposed Action, the EA, or draft FNSI. As appropriate, the Army may then execute the FNSI and proceed with implementation of the Proposed Action. If it is determined prior to issuance of a final FNSI that implementation of the Proposed Action would result in significant impacts, the Army will publish in the *Federal Register* a notice of intent to prepare an environmental impact statement, commit to mitigation actions sufficient to reduce impacts to less than significant levels, or not take the action.

Throughout this process, the public may obtain information on the status and progress of the Proposed Action and the EA through the United States Army Reserve (USAR) 90th Regional Readiness Command (RRC) by contacting Mr. James Wheeler, II, Chief, Environmental Division, 8000 Camp Robinson Road, North Little Rock, Arkansas 72118-2205 or by phone at (501) 771-7992.

1.5 Regulatory Framework

A decision on whether 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, U.S. Army Corps of Engineers (USACE) Mobile District and the 90th RRC are 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. Establishment of the AFRC in San Marcos requires compliance with the Federal regulations and EOs presented below in Table 1-1. The current compliance status is also presented.

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

**Table 1-1. Summary of Relevant Regulations
Including Potential Permits or Licensing Requirements**

Issue	Action Requiring Permit, Approval, or Review	Agency	Permit, License, Compliance, or Review/Status	Status of Compliance with Relevant Laws and Regulations
FEDERAL				
General	National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.)	Council on Environmental Quality (CEQ)	Compliance with NEPA, in accordance with CEQ regulations (40 CFR 1500-1508)	Full compliance will be achieved upon issuance of signed FNSI (if appropriate).
	32 CFR 651 (Environmental Analysis of Army Actions)	Department of the Army	Compliance with regulations specified in 32 CFR 551	Full compliance will be achieved upon issuance of signed FNSI (if appropriate).
Sound/ Noise	Noise Control Act of 1972 (42 USC 4901 et seq.), as amended by Quiet Communities of 1978 (P.L. 95-609)	United States Environmental Protection Agency (EPA)	Compliance with surface carrier noise emissions	No sensitive noise receptors will be affected by construction activities. Full compliance will thus be achieved.
Air	Clean Air Act and amendments of 1990 (42 USC 7401-7671q) 40 CFR 50, 52, 93.153(b)	EPA	Compliance with National Ambient Air Quality Standards (NAAQS) and emission limits and/or reduction measures	Full compliance; emissions will be below <i>de minimis</i> thresholds.
Water	Clean Water Act of 1977 (33 USC 1342) 40 CFR 122	EPA and Texas Commission on Environmental Quality (TCEQ)	Section 402(b) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges for Construction Activities-Stormwater Pollution Prevention Plan (SWPPP)	SWPPP and Notice of Intent will be prepared prior to construction. Full compliance will be achieved prior to implementation of construction activities.
	Executive Order 11988 (Floodplain Management), as amended by Executive Order 12608	Water Resources Council, Federal Emergency Management Agency (FEMA), CEQ	Compliance	Full compliance.
	Executive Order 11990 (Protection of Wetlands), as amended by Executive Order 12608	USACE and U.S. Fish and Wildlife Service (USFWS)	Compliance	Full compliance.
	Clean Water Act of 1977 (33 USC 1341 et seq.)	USACE and TCEQ	Section 401/404 Permit	No Waters of the U.S., including wetlands, are present on the site.
	Coastal Zone Management Act of 1972 (16 USC 1456[c]) Section 307	National Oceanic and Atmospheric Administration	Compliance	San Marcos is not within the coastal zone.

Table 1-1, continued

Issue	Action Requiring Permit, Approval, or Review	Agency	Permit, License, Compliance, or Review/Status	Status of Compliance with Relevant Laws and Regulations
Soils	Resource Conservation and Recovery Act of 1976 (42 USC 6901-6992k), as amended by Hazardous and Solid Waste Amendments of 1984 (P.L. 98-616; 98 Stat. 3221)	EPA	Proper management, and in some cases, permit for remediation	Full compliance. No <i>recognized environmental conditions</i> have been reported at the preferred site.
	Comprehensive, Environmental Response, Compensation, Liability Act of 1980 (42 USC 9601-9675), as amended by Emergency Planning and Community Right-To-Know-Act of 1986 (42 USC 11001 et seq.) Release or threatened release of a hazardous substance	EPA	Development of emergency response plans, notification, and cleanup	Full compliance.
	Farmland Protection Policy Act of 1981 (7 USC 4201 et seq.) 7 CFR 657-658 Prime and unique farmlands	Natural Resource Conservation Service (NRCS)	NRCS determination via Form AD-1006	NRCS Form AD-1006 submitted on 22 August 2008. Concurrence was received on 22 October 2008.
Natural Resources	Endangered Species Act of 1973, as amended (16 USC 1531-1544)	USFWS	Compliance by lead agency and/or consultation to assess impacts and, if necessary, develop mitigation measures	Full compliance since no protected species would be impacted. Concurrence was received from USFWS on 10 November 2008.
	Migratory Bird Treaty Act of 1918	USFWS	Compliance by lead agency and/or consultation to assess impacts and, if necessary, develop mitigation measures	Full compliance will be achieved upon implementation of construction activities. If initial grubbing and clearing can not avoid nesting season, breeding pairs and nests will be identified and avoided to the extent practicable.
	Bald and Golden Eagle Act of 1940, as amended	USFWS	Compliance by lead agency and/or consultation to assess impacts and, if necessary, obtain permit	No effects on bald or golden eagles; full compliance.
Health and Safety	Occupational Safety and Health Act of 1970	Occupational Safety and Health Administration (OSHA)	Compliance with guidelines including Material Safety Data Sheets	Full compliance will be achieved upon implementation of construction activities.

Table 1-1, continued

Issue	Action Requiring Permit, Approval, or Review	Agency	Permit, License, Compliance, or Review/Status	Status of Compliance with Relevant Laws and Regulations
Cultural/ Archaeo- logical	National Historic Preservation Act of 1966	Advisory Council on Historic Preservation through State Historic Preservation Officer (SHPO)	Section 106 Consultation	Full compliance; no historic properties would be affected. Concurrence from Texas Historical Commission was received on 17 November 2008.
	Archaeological Resources Protection Act of 1979	Affected land-managing agency	Permits to survey and excavate/remove archaeological resources on Federal lands; Native American tribes with interests in resources must be consulted prior to issue of permits.	Full compliance.
	Native American Graves & Repatriation Act (NAGPRA) as amended	National Park Service (NPS)	Coordination directly with tribes claiming cultural affinity to project areas	Full Compliance
	American Indian Religious Freedom Act (AIRFA)	National Park Service (NPS)	Coordination directly with tribes claiming cultural affinity to project areas	Full Compliance
	EO 13175 (<i>Consultation and Coordination with Indian Tribal Governments</i>)	Bureau of Indian Affairs (BIA)	Coordinate directly with Tribes claiming cultural affinity to project areas	Full compliance.
Social/ Economic	Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) of 1994	EPA	Compliance	Full compliance since no minority or low income populations would be affected.
	EO 13045 (<i>Protection of Children from Environmental Health Risks and Safety Risks</i>)	EPA	Compliance	Full compliance since no children would be exposed to the construction activities.
	EO 13101 (<i>Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition</i>)	EPA	Compliance	Full compliance.
	EO 13123 (<i>Greening the Government Through Efficient Energy Management</i>)	EPA	Compliance	Full compliance.
	EO 13148 (<i>Greening the Government Through Leadership in Environmental Management</i>)	EPA	Compliance	Full compliance.

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SECTION 2.0
PROPOSED ACTION



2.0 Proposed Action

2.1 Introduction

This section describes the Army's preferred alternative for carrying out the BRAC Commission's recommendations. The BRAC Commission approved the following recommendation concerning the San Marcos USARC:

“Close the United States Army Reserve Center, San Marcos, TX, and relocate units to a new Armed Forces Reserve Center, in San Marcos, TX, if the Army is able to acquire land suitable for the construction of facilities. The new AFRC shall have the capability to accommodate Texas National Guard Units from the following Texas ARNG Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate those National Guard units.”

Therefore, the Proposed Action is to establish a new AFRC in San Marcos to accommodate the closure of the San Marcos USARC and relocation of the units to the new AFRC. The preferred site, depicted in Figure 2-1, is located along Clovis Barker Boulevard, about 0.25 mile east of Interstate 35 (I-35). The new 600-member AFRC would include administrative, assembly, educational, storage, and physical fitness training facilities to accommodate two USAR units and eight Texas ARNG units. The main AFRC building would be of permanent construction and approximately 108,633 square feet (SF) in size excluding storage areas, associated parking areas, sidewalks and landscaping. The action would also include construction of a vehicle maintenance facility and storage facilities. All other associated infrastructure (e.g., plumbing; electrical systems; heating, ventilation, and air conditioning [HVAC] systems; and anti-terrorism/force protection [AT/FP] systems) would also be provided. The preferred site is approximately 19.13 acres; however, the total area expected to be disturbed by the Proposed Action is approximately 14 acres. These inactivation and relocation actions, beginning in Fiscal Year 2008, support the BRAC Commission's recommendation.

2.2 Force Structure

Force structure refers to the numbers, size, and composition of units comprising Army forces. BRAC Commission recommendations concerning the San Marcos AFRC include changes of force structure through the reassignment of units from closing the San Marcos USARC. As a result of proposed relocation, there would be no net change of active duty and civilian personnel at the AFRC, relative to the San Marcos USARC. The new site, however, would be used by 12 full-time permanent staff and up to 600 USAR personnel during training activities.

2.3 Garrison Facilities

Implementation of the Proposed Action would require the construction of a 600-member AFRC in San Marcos that would include administrative, educational, storage, vehicle maintenance, library, and support areas. Table 2-1 identifies the proposed facilities projects. New construction projects would provide approximately 131,154 SF of total building space and 26,987 SF of parking.

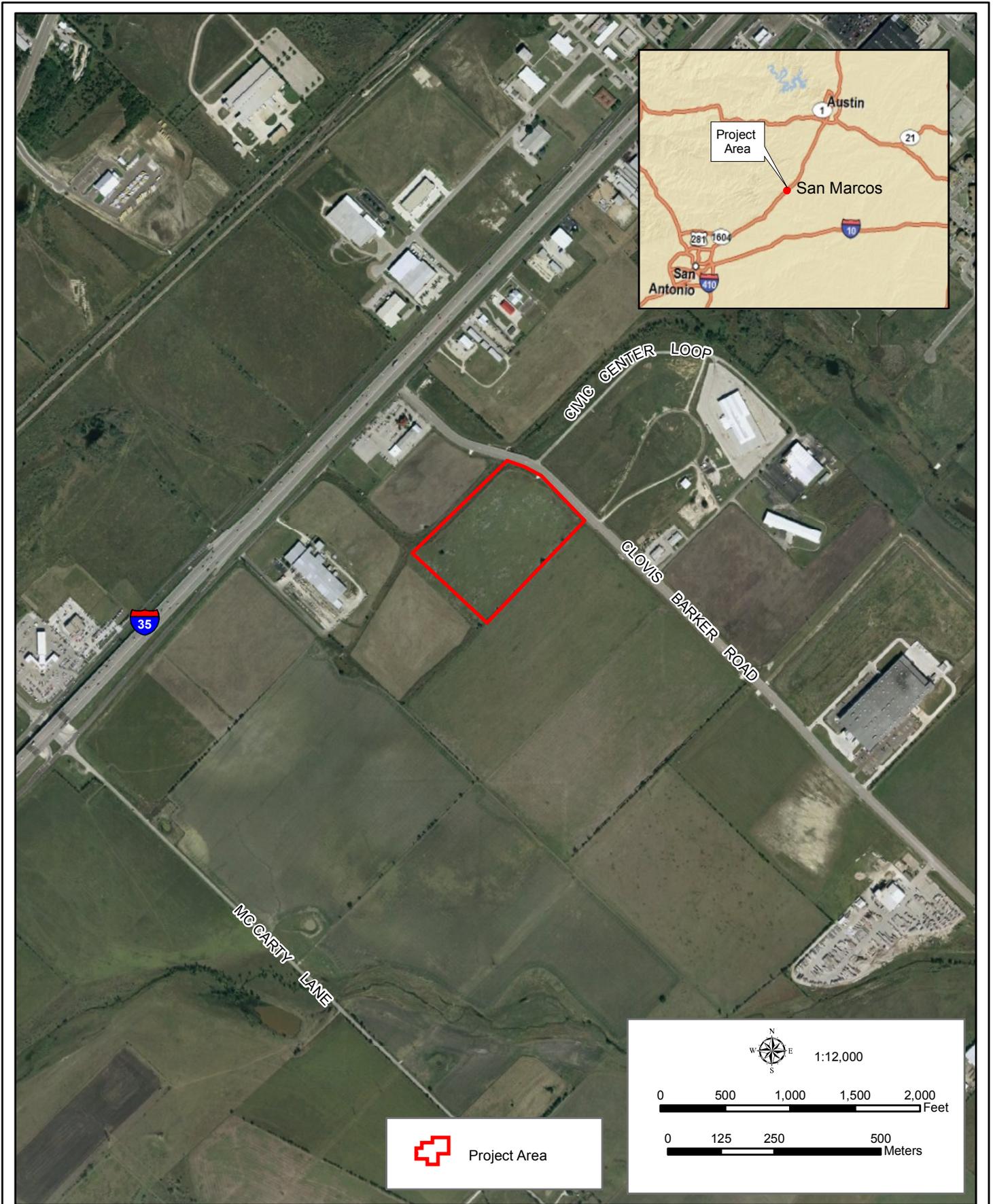


Figure 2-1: Project Site Map - Preferred Site



August 2008

Table 2-1. Proposed Construction Projects

Project No.	Facility	Square Feet (approximate)
64469	Armed Forces Reserve Center	108,633
64469	Vehicle Maintenance Shop	19,513
64469	Organizational Unit Storage	3,008
64469	Parking	26,987
Total		158,141

Figure 2-2 illustrates the site plan of the proposed AFRC at the preferred site. As can be seen, the western portion of the site is currently planned to remain undeveloped. Since there would be no net gain of personnel (military and civilians) assigned to the San Marcos AFRC, and the new AFRC would be less than 3 miles to the south of the existing San Marcos USARC, there would be, in effect, no change in housing needs. No demolition would be required under the Proposed Action at the preferred site, since the preferred site is vacant.

2.4 Training Facilities and Airspace

There would be no change to training range size or operations or airspace demands as a result of the Proposed Action. Units that use the San Marcos USARC would continue to use Fort Hood, Texas and Camp Bullis, Texas as field training sites.

2.5 Weapon Systems

There would be no weapon systems used at the San Marcos AFRC as a result of the Proposed Action.

2.6 Schedule

Under the BRAC law, the Army must have initiated all realignments not later than September 15, 2007, and complete all realignments not later than September 15, 2011. Implementation of the Proposed Action would occur over a span of nearly 3 years. Facilities construction would be synchronized to meet the needs, on a priority basis, of units being relocated from overseas. Establishment of new units would occur as facilities for their operations and support become available. Table 2-2, below, is a tentative schedule for the design, construction activities and the proposed realignment actions.

Table 2-2. Tentative Dates for Completion of Major Items Associated with Relocation of Units at San Marcos, Texas

Action	Tentative Start Date	Tentative Completion Date
Design of New Facility	February 2009	August 2009
Construction of New Facility	September 2009	September 2010
Realignment of San Marcos USARC to the new San Marcos AFRC	October 2010	September 2011



Figure 2-2: Conceptual Site Plan



November 2008

SECTION 3.0
ALTERNATIVES



3.0 Alternatives

3.1 Introduction

A basic principle of NEPA is that an agency should consider reasonable alternatives to a Proposed Action. Considering alternatives helps to avoid unnecessary impacts and allows analysis of reasonable ways to achieve the stated purpose. To warrant detailed evaluation, an alternative must be reasonable. To be considered reasonable, an alternative must be ready for decision making (any necessary preceding events having taken place), affordable, capable of implementation, and satisfactory with respect to meeting the purpose of and need for the action. The following discussion identifies alternatives considered by the Army and identifies whether they are feasible and, hence, subject to detailed evaluation in the EA.

Alternatives to the Proposed Action have been examined according to three variables: means to physically accommodate realigned units, siting of new construction, and schedule. This section presents the Army's development of alternatives and addresses alternatives available for the Proposed Action. The section also describes the no action alternative.

General siting criteria for the AFRC include consideration of compatibility between the functions to be performed and the land use designation for the site, adequacy of the site for the function required, proximity to related activities, distance from incompatible activities, availability and capacity of roads, efficient use of property, development density, potential future mission requirements, and special site characteristics, including environmental incompatibilities. These criteria are in compliance with guidelines presented in Section 5.7 of Army Regulations (AR) 140-483 (U.S. Army 2007).

Specific siting criteria include consideration of location of the workforce and efficient, streamlined management of functions. Other specific criteria require that the site is a minimum size of 12 acres, a rectangular shaped parcel and has a minimum side length of 500 feet. The latter is required to ensure sufficient size to comply with AT/FP requirements of 200-foot wide setbacks.

3.2 Development of Alternatives

3.2.1 Means to Accommodate Realigned Units

Other means or measures to relocate the USAR units in San Marcos would not be in compliance with the BRAC Commission's recommendations. Thus, other means of providing increased space requirements, including use of existing facilities, modernization or renovation of existing facilities, and leasing of off-post facilities are not considered viable and were eliminated from further consideration, as will be discussed later.

3.2.2 Siting of New Construction

The Army considers new construction of facilities when use of existing facilities, renovation, or leasing would fail to provide for adequate accommodations of realigned functions. The Army considers both general and specific siting criteria for construction of new facilities. The USACE Fort Worth District prepared the Available Site Identification and Validation (ASIV) Report for the proposed establishment of the new AFRC. The ASIV team evaluated six other sites as potential sites for the siting of the new AFRC. These sites were eliminated from further consideration, as will be discussed later. A copy of the ASIV and Site Survey Report is presented in Appendix A.

The preferred site conforms to the City of San Marco's zoning ordinances and adheres to the general and specific siting criteria described above. This project has been coordinated with the 90th RRC's physical security plan and all physical security measures would be included. All required AT/FP measures would also be included.

3.2.3 Schedule

Alternatives for scheduling of proposed realignment actions are principally affected by three factors: the availability of facilities to house realigned personnel and functions, efforts to minimize potential disruption of mission activities based on the number of personnel involved in the relocation or the amount of work to be performed, and early realization of benefits to be gained by completion of the realignments. In most cases, minor shifts in schedule would not produce different environmental results.

3.3 Alternatives Eliminated from Further Consideration

3.3.1 Use of Leased Facilities to Accommodate Relocated Units

Use of leased space from private or commercial entities to meet the AFRC's requirements would involve several major drawbacks. AT/FP policies specify certain facilities characteristics, such as physical security features, a 200 feet set-back from roadways, and "hardened" or reinforced construction. Implementation of these measures would substantially increase the cost of leasing and might be prohibited by lessors, further complicating the potential to use leased space. To satisfy administrative space requirements and AT/FP measures, leasing of several facilities might also be required. Furthermore, use of leased space would not satisfy the BRAC requirements to build a new AFRC. For these reasons, use of leased space from private entities is not feasible and will not be evaluated in the EA.

3.3.2 Use of Existing USARC to Accommodate Relocated Units

Construction of new facilities is driven by the need to ensure adequate space is available for mission requirements. The San Marcos USARC's existing building space is currently utilized at 195 percent of its capacity for administrative and military mission requirements. In addition, it is located on 3.88 acres and 45 years old. The existing USARC is surrounded by residential and commercial properties that would prohibit expansion for new building construction. Accordingly, new construction at a different site is required. Furthermore, renovation would not satisfy the BRAC requirement to construct a new AFRC. Thus, the alternative to use or renovate existing facilities is not discussed further in this EA.

3.3.3 Other Construction Sites

In addition to the preferred site identified by the ASIV team, six other sites (ASIV Sites 1 through 6) were evaluated but were eliminated from further consideration (see Appendix A). The locations of these sites are presented on Figure 3-1. The reason these sites were eliminated is that the site survey team determined that the majority of each parcel was within the 100-year floodplain. Some sites were also subsequently removed from the real estate markets.

3.3.4 Schedule

The schedule for implementation of the Proposed Action must balance facilities construction time frames, planned arrival dates of inbound units and stand-up dates of newly-established units. All of these actions need to be completed within the 6-year limitation of the BRAC law (see Section 2.6). Realignment earlier than that shown in the schedule in Section 2.6 is not feasible in light of the time required to build facilities. Shifting of schedules to accomplish realignment at a later date would unnecessarily delay realization of benefits to be gained and

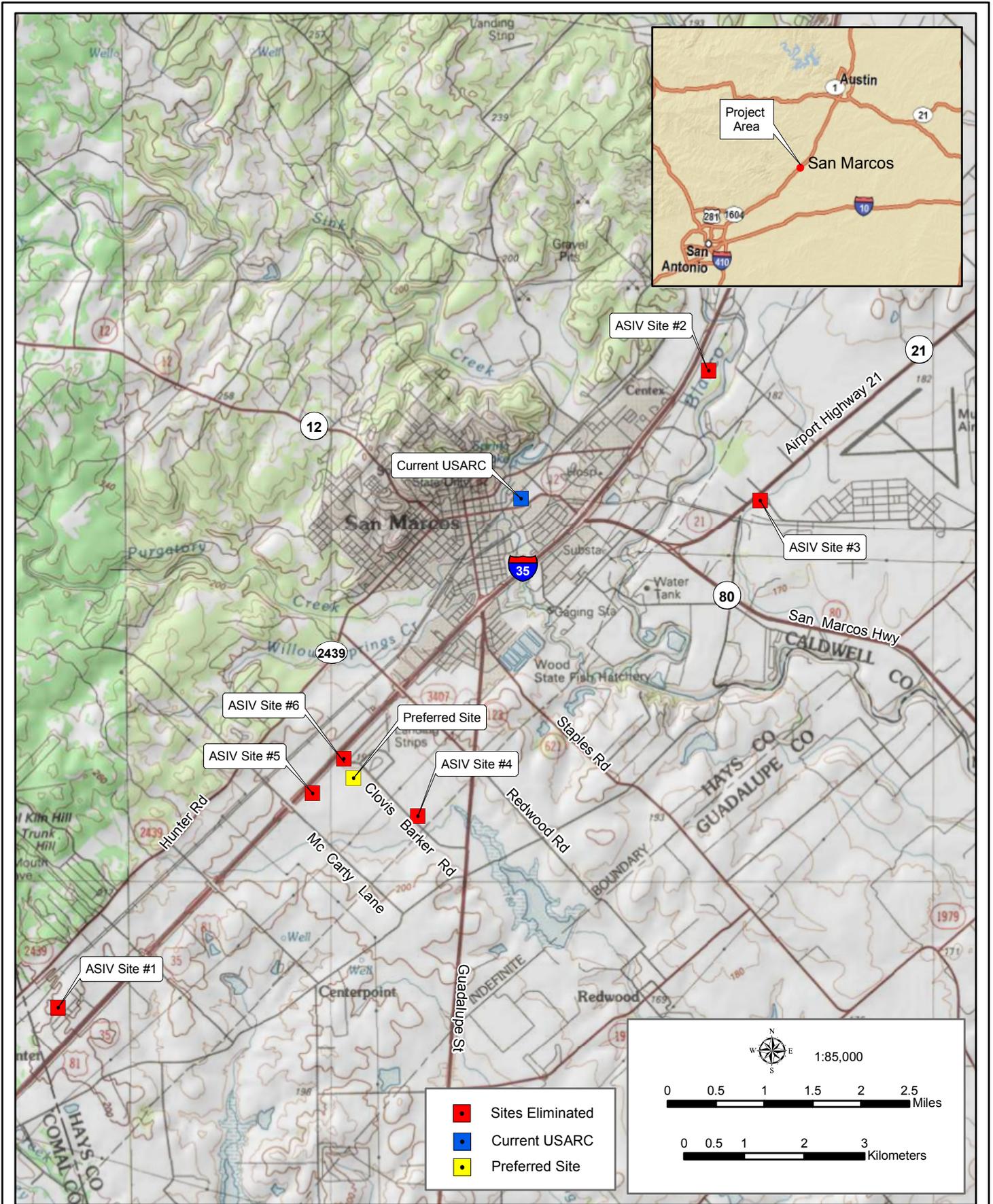


Figure 3-1: Alternative Sites Eliminated from Consideration

would disrupt mission activities. Since earlier implementation is not possible, and delay is avoidable and unnecessary, alternative schedules are not further evaluated in this EA.

3.4 No Action Alternative

CEQ regulations require inclusion of the No Action Alternative. Under the No Action Alternative, the San Marcos USARC would not be closed and the USAR units would not be relocated to a new AFRC. However, since the closure and establishment of a new AFRC has been mandated by Congress and the President, the No Action Alternative will serve as a baseline against which the impacts of the Proposed Action can be evaluated.

SECTION 4.0
AFFECTED ENVIRONMENT AND CONSEQUENCES

4.0 Affected Environment and Consequences

4.1 Introduction

This section of the EA describes the natural and human environment that exists at and surrounding the preferred site in southwest San Marcos, and the potential effects on those resources as a result of the Proposed Action and alternatives. For the purposes of this EA, the project site is defined as the 19.13 acres identified as the preferred site for construction of the AFRC. The project area includes San Marcos and the lands surrounding the preferred site. The project region or vicinity is Hays County.

Only those parameters that have the potential to be affected by the Proposed Action Alternative and alternatives are described, as per CEQ guidance (40 CFR 1501.7 [3]). Therefore, resources and items, such as climate, air space, geology, coastal zone resources, communication systems, energy sources, and solid waste are not addressed for the following reasons:

- Climate—the proposed project would not affect, nor be affected by, climate.
- Air space—the proposed project does not involve any additional aircraft training, and, thus, air space would not be affected.
- Geology—the San Marcos area geology consists of Quaternary alluvium deposited over older Upper Cretaceous limestones of the Austin Group and the Edwards Group, which comprises the Edwards aquifer system in front of the Edwards plateau, between Austin and San Antonio, Texas (Guyton 1979). No geologic resources or geologic outcrops of any importance are present, and no impacts on surface or subsurface geology would occur as a result of any of the alternatives. The project site is located below the recharge zone for the Edwards aquifer. Further analysis of geology impacts is not necessary for this EA.
- Coastal zone—the project site is not located within Texas' coastal zone
- Communication systems—the project would have negligible additional demand or other impact on local or regional communication systems.
- Energy sources—slight increases in energy consumption would occur during the construction of the AFRC facility. However, the majority of the energy demands at the preferred site would be met by the same regional grid as currently used at the existing USARC.
- Solid waste—the Proposed Action Alternative would not result in increased production of solid waste in the region, since the majority of the personnel would be relocated from the existing San Marcos USARC, which is approximately 3 miles away. Negligible amounts of solid waste would be generated during the construction and this waste would be properly deposited by licensed contractors.

An impact (consequence or effect) is defined as a modification of the human or natural environment that would result from the implementation of an action. The impacts can be either beneficial or adverse, and can be either directly related to the action or indirectly caused by the action (secondary, indirect, or synergistic effects). The effects can be temporary (short-term), long lasting (long-term), or permanent. For purposes of this EA, temporary effects are defined as those that would last less than 3 years after completion of the action. Long-term impacts are defined as those that would last up to 20 years. Permanent impacts are those that may

reasonably be expected to endure beyond the 20-year timeframe established for long-term impacts.

Impacts can vary in degree or magnitude from a slightly noticeable change to a total change in the environment. The significance of the impacts presented in this EA is based upon existing regulatory standards, scientific and environmental knowledge, and/or best professional opinions of the authors of the EA. The significance of the impacts on each resource will be described as significant, moderate, minimal, insignificant (or negligible), or no impact. Significant impacts are those effects that would result in substantial changes to the environment and should receive the greatest attention in the decision-making process.

4.2 Land Use

4.2.1 Affected Environment

4.2.1.1 Regional Setting

The preferred site is located in south central Texas, in the southwestern portion of the Round Rock-Austin MSA. San Marcos is a city of 47,181 residents (U.S. Census Bureau 2006a). The site is located along the south side of Clovis Barker Boulevard, about 0.25 mile east of I-35.

4.2.1.2 Installation Land Use

The existing San Marcos USARC was constructed in 1962 on 3.88 acres in San Marcos, Texas. The center is currently utilized at 195 percent of its capacity for administrative, commercial, and military mission requirements. The existing USARC is surrounded by residential and commercial properties that would prohibit expansion for new building construction.

4.2.1.3 Current and Planned Development

The preferred site is currently crop land (corn [*Zea mays*]) under private ownership. The surrounding land uses include commercial hotels and other developments, public utilities (i.e., power and water distribution), transportation (i.e., public roads and railroads), private warehouses, and agricultural operations. The area is currently zoned for industrial. There are no current development or improvement plans for the preferred site (Foreman 2008).

4.2.2 Environmental Consequences

4.2.2.1 Proposed Action Alternative

The preferred site is approximately 19.13 acres of agricultural crop land. The total area expected to be converted to impervious pavement and buildings by the Proposed Action is approximately 14 acres; however, the entire 19 acres would be removed from agricultural production and converted to military uses. Activities at the AFRC would be limited to administrative and classroom training, as well as vehicle maintenance and repair. This use is consistent with the current zoning for this site. Therefore, negligible adverse impacts on land use would occur upon implementation of the Proposed Action Alternative.

4.2.2.2 No Action Alternative

Under the No Action Alternative, the San Marcos USARC would not be closed and the USAR units would not be relocated to a new AFRC. Thus, no direct short-term changes in land use to the proposed construction sites would occur under the No Action Alternative.

4.3 Aesthetics and Visual Resources

4.3.1 Affected Environment

The San Marcos USARC has been developed over the past several decades such that most, if not all, of the land has been disturbed at some time. The center is surrounded by residential and commercial properties. Consequently, the USARC site has limited visual qualities. The preferred site is agricultural crop land, surrounded by various developments, including I-35, warehouses, and light industrial facilities. Thus, the preferred site affords limited aesthetic qualities.

4.3.2 Environmental Consequences

4.3.2.1 Proposed Action Alternative

Construction and operation of the AFRC at the preferred site would eliminate approximately 14 acres of agricultural land and permanently replace these acres with pavement and hard structures. Temporary construction areas would need to be immediately replanted with native vegetation to avoid additional long-term or permanent adverse effects to the area's aesthetic resources. Nonetheless, because of the small amount of acreage impacted and existing land uses at and surrounding the preferred site, the permanent and temporary effects to the aesthetics and visual resources of the area would not be considered significant.

4.3.2.2 No Action Alternative

Implementation of the No Action Alternative would allow the sites to remain in the current conditions, at least for the short term. The preferred site would continue to be vacant, unimproved land with limited visual qualities.

4.4 Air Quality

4.4.1 Affected Environment

The U.S. Environmental Protection Agency (EPA) established National Ambient Air Quality Standards (NAAQS) for specific pollutants determined to be of concern with respect to the health and welfare of the general public. Ambient air quality standards are classified as either "primary" or "secondary." The major pollutants of concern, or criteria pollutants, are carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone (O₃), particulate matter less than 10 microns (PM-10), particulate matter less than 2.5 microns (PM-2.5) and lead. NAAQS represent the maximum levels of background pollution that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The NAAQS are included in Table 4-1.

Table 4-1. National Ambient Air Quality Standards

POLLUTANT	STANDARD VALUE	STANDARD TYPE
Carbon Monoxide (CO)		
8-hour average	9ppm (10mg/m ³)*	P
1-hour average	35ppm (40mg/m ³)*	P
Nitrogen Dioxide (NO₂)		
Annual arithmetic mean	0.053ppm (100µm ³)*	P and S
Ozone (O₃)		
8-hour average	0.08ppm (157µg/m ³)*	P and S
1-hour average	0.12ppm (235µg/m ³)*	P and S
Lead (Pb)		
Quarterly average	1.5µg/m ³	P and S
Particulate<10 micrometers (PM-10)		
Annual arithmetic mean	50µg/m ³	P and S
24-hour average	150µg/m ³	P and S
Particulate<2.5 micrometers (PM-2.5)		
Annual arithmetic mean	15µg/m ³	P and S
24-hour average	65µg/m ³	P and S
Sulfur Dioxide (SO₂)		
Annual average mean	0.03ppm (80µg/m ³)	P
24-hour average	0.14ppm (365µg/m ³)	P
3-hour average	0.50ppm (1300µg/m ³)	S

Legend: P= Primary S= Secondary

Source: EPA 2006.

ppm = parts per million

mg/m³ = milligrams per cubic meter of air

µg/m³ = micrograms per cubic meter of air

* Parenthetical value is an approximate equivalent concentration

Areas that do not meet these NAAQS standards are called non-attainment areas; areas that meet both primary and secondary standards are known as attainment areas. The Federal Conformity Final Rule (40 CFR Parts 51 and 93) specifies criteria or requirements for conformity determinations for Federal projects. The Federal Conformity Rule was first promulgated in 1993 by the EPA, following the passage of Amendments to the Clean Air Act in 1990. The rule mandates that a conformity analysis must be performed when a Federal action generates air pollutants in a region that has been designated a non-attainment or maintenance area for one or more NAAQS.

A conformity analysis is the process used to determine whether a Federal action meets the requirements of the General Conformity Rule. It requires the responsible Federal agency to evaluate the nature of a proposed action and associated air pollutant emissions, and calculate emissions as a result of the proposed action. If the emissions exceed established limits, known as *de minimis* thresholds, the proponent is required to implement appropriate mitigation measures. The EPA considers Hays County as in attainment for all NAAQS (USEPA 2008).

4.4.2 Environmental Consequences

4.4.2.1 Proposed Action Alternative

Temporary and minor increases in air pollution would occur from the use of construction equipment (combustible emissions) and the disturbance of soils (fugitive dust) during construction of the AFRC. Fugitive dust emissions were calculated using the emission factor of

0.11 ton per acre per month (MRI 1996), which is a more current standard than the AP- 42 (1985) emission factor (EPA 2001).

Combustible emission calculations were made for standard construction equipment, such as bulldozers, excavators, pole trucks, front-end loaders, backhoes, cranes, and dump trucks, using emission factors from NONROAD Model (EPA 2005a), as recommended by EPA's *Procedures Document for National Emission Inventory, Criteria Air Pollutants, 1985-1999* (EPA 2001). Assumptions were made regarding the type of equipment, the total number of days each piece of equipment would be used, and the number of hours per day each type of equipment would be used.

Construction workers would temporarily increase the combustible emissions in the airshed during their commute to and from the project area. Similarly, emissions from delivery trucks contribute to the overall air emission budget. The new AFRC would add approximately 70 new commuters driving in the airshed on the weekends and 12 full-time staff commuting during weekdays (Scott 2008). The air emissions from delivery trucks, construction worker commuters traveling to the job site, weekend trainees and fulltime staff were calculated using the EPA MOBILE6.2 Model (EPA 2005a, 2005b, 2005c and 2005d). The construction emissions were calculated in the air emission analysis and included in the total emission estimates found in Table 4-2. Details of the analyses are presented in Appendix B.

Table 4-2. Hays County Total Air Emissions (tons/year) from Construction Activities vs. *de minimis* Levels

Pollutant	Total (tons/year)	<i>de minimis</i> Thresholds (tons/year)
CO	35.38	100
volatile organic compounds (VOC)	6.38	100
NOx	38.87	100
PM-10	19.26	100
PM-2.5	6.50	100
Sulfur Dioxide (SO ₂)	4.51	100

Source: *De-minimis* thresholds are from 40 CFR 51.853 and GSRC model projections

Note: Hays County is in attainment for all NAAQS.

Several sources contribute to the total air impacts of the construction project. The air calculations in Table 4-2 included emissions from:

1. Combustible engines of construction equipment.
2. Construction workers commuting to and from work.
3. Supply trucks delivering materials for construction.
4. Fugitive dust from job site ground disturbances.

Calculations were also performed to determine the annual emissions created by the introduction of 70 commuters to this portion of Hays County during weekend training periods and up to 12 full-time staff. The calculations and assumptions are contained in Appendix B and the emissions are summarized in Table 4-3 below.

Table 4-3. Hays County Total Air Emissions (tons/year) from AFRC Commuters vs. *de minimis* Levels

Pollutant	Total (tons/year)	<i>de minimis</i> Thresholds (tons/year)
CO	3.00	100
VOCs	0.32	100
NOx	0.23	100
PM-10	0.00	100
PM-2.5	0.00	100
Sulfur Dioxide (SO ₂)	NA	100

Source: *De-minimis* thresholds are from 40 CFR 51.853 and GSRC model projections
 Note: Hays County is in attainment for all NAAQS.

As can be seen from the tables, air emission from either the construction activities or the ongoing operations would not exceed *de minimis* thresholds and, thus, would not require a Conformity Determination. The existing USARC and the proposed AFRC are located in the same airshed; therefore, the staff daily commuter traffic, as well as weekend training traffic, would not increase emissions in the airshed, but would shift the emission sources from one part of the airshed to another. As there are no violations of air quality standards and no conflicts with the state implementation plans, there would be minor, temporary impacts on air quality as a result of the Proposed Action.

During the construction of the AFRC, proper and routine maintenance of all vehicles and other construction equipment would ensure that emissions are within the design standards of the equipment. Dust suppression methods would be implemented to minimize fugitive dust. In particular, wetting solutions would be applied to construction areas to minimize the emissions of fugitive dust. By using these environmental design measures, air emissions from the Proposed Action would be temporary, and would result in minor impairments to air quality in the region.

4.4.2.2 No Action Alternative

Implementation of the No Action Alternative would not create additional air emissions in the Hays County airshed.

4.5 Noise

4.5.1 Affected Environment

Noise is generally described as unwanted sound, which can be based either on objective effects (i.e., hearing loss, damage to structures, etc.) or subjective judgments (e.g., community annoyance). Sound is usually represented on a logarithmic scale with a unit called the decibel (dB). Sound on the decibel scale is referred to as sound level. The threshold of human hearing is approximately 0 dB, and the threshold of discomfort or pain is around 120 dB.

Noise levels occurring at night generally produce a greater annoyance than do the same levels occurring during the day. It is generally agreed that people perceive intrusive noise at night as being 10 dBA (A-weighted decibel is a measure of noise at a given, maximum level or constant state level) louder than the same level of intrusive noise during the day, at least in terms of its potential for causing community annoyance. This perception is largely because background environmental sound levels at night in most areas are also about 10 dBA lower than those during the day.

Acceptable noise levels have been established by the U.S. Department of Housing and Urban Development (HUD) for construction activities in residential areas (HUD 1984).

Acceptable (not exceeding 65 dBA) – The noise exposure may be of some concern but common building construction will make the indoor environment acceptable and the outdoor environment will be reasonably pleasant for recreation and play.

Normally Unacceptable (above 65 but not greater than 75 dBA) – The noise exposure is significantly more severe; barriers may be necessary between the site and prominent noise sources to make the outdoor environment acceptable; special building construction may be necessary to ensure that people indoors are sufficiently protected from outdoor noise.

Unacceptable (greater than 75 dBA) – The noise exposure at the site is so severe that the construction costs to make the indoor noise environment acceptable may be prohibitive and the outdoor environment would still be unacceptable.

As a general rule of thumb, noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces and 9 dBA over soft surfaces for each doubling of the distance. For example, if a noise source produces a noise level of 85 dBA at a reference distance of 50 feet over a hard surface, then the noise level would be 79 dBA at a distance of 100 feet from the noise source, 73 dBA at a distance of 200 feet, and so on. To estimate the attenuation of the noise over a given distance the following relationship is utilized:

$$\text{Equation 1: } dBA_2 = dBA_1 - 20 \log \left(\frac{d_2}{d_1} \right)$$

Where:

- dBA_2 = dBA at distance 2 from source (predicted)
- dBA_1 = dBA at distance 1 from source (measured)
- d_2 = Distance to location 2 from the source
- d_1 = Distance to location 1 from the source

Source: California Department of Transportation 1998

The project site is located in an rural/industrial area. Although noise receptors (office buildings) are located east of the project site approximately 600 feet, no noise sensitive receptors (e.g., hospitals, parks, schools, churches, etc.) are located in or near the project area. Industrial facilities are located west of the site and agricultural lands are located south of the site.

4.5.2 Environmental Consequences

4.5.2.1 Proposed Action Alternative

The installation of the new AFRC would require the use of common construction equipment. Table 4-4 describes noise emission levels for construction equipment which range from 76 dBA to 82 dBA at a distance of 50 feet (Federal Highway Administration 2007 [FHWA] 2007). Assuming the worst case scenario of 82 dBA, the noise model projected that noise levels of 82 dBA from a point source (i.e., bull dozer) would have to travel 370 feet before the noise would be attenuated to an acceptable level of 65 dBA. To achieve an attenuation of 82 dBA to a normally unacceptable level of 75 dBA, the distance from the noise source to the receptor is 110 feet.

Table 4-4. A-Weighted (dBA) Sound Levels of Construction Equipment and Modeled Attenuation at Various Distances¹

Noise Source	50 feet	100 feet	200 feet	500 feet	1000 feet
Backhoe	78	72	66	58	52
Crane	81	75	69	61	55
Dump truck	76	70	64	56	50
Excavator	81	75	69	61	55
Front end loader	79	73	67	59	53
Concrete mixer truck	79	73	67	59	53
Pneumatic tools	81	75	69	61	55
Bull dozer	82	76	70	62	56
Generator	81	75	69	61	55

Source: FHWA 2007 and GSRC

1. The dBA at 50 feet is a measured noise emission (FHWA 2007). The 100 to 1,000 foot results are modeled estimates.

Figure 4-1 depicts the construction area within the 19-acre site and the 65-dBA noise contour. As can be seen from this figure there are no residences or other sensitive noise receptors within 370 feet of the construction area. The nearest receptors are office buildings 600 feet from the east border of the construction site on Civic Center Loop. These receptors would be exposed to noise emissions that are considered normally acceptable (less than 65 dBA). Noise generated by the construction of the AFRC would be intermittent and last for 1 year, after which, noise levels would return to ambient levels, and, thus, would be considered insignificant.

Operation of the AFRC would generate some additional noise due to traffic and vehicle repair shops. These activities would occur primarily during the day, when the adjacent streets experience heavy traffic volumes. Consequently, negligible impacts on the project area's ambient noise levels would be expected.

4.5.2.2 No Action Alternative

Implementation of the No Action Alternative would not impact ambient noise levels in the region.

4.6 Soil Resources

4.6.1 Affected Environment

The soils present on the surface of the Preferred Alternative site consist of Branyon clay at 0 to 1 percent slopes on level surfaces and Tinn clay at 0 to 1 percent slopes in a drainage way on the property (Figure 4-2). The Branyon clay is a common soil in the upland areas around the project site. According to the Natural Resources Conservation Service (NRCS 2008), Branyon clay is considered prime farmland soil, and conversion of this soil at the project site would require completion of a Farmland Conversion Impact Rating assessment and consultation with the local NRCS office. The Preferred Alternative site is currently a tilled agricultural field planted in corn. Surrounding agricultural fields are maintained for hay, corn, and cotton production.

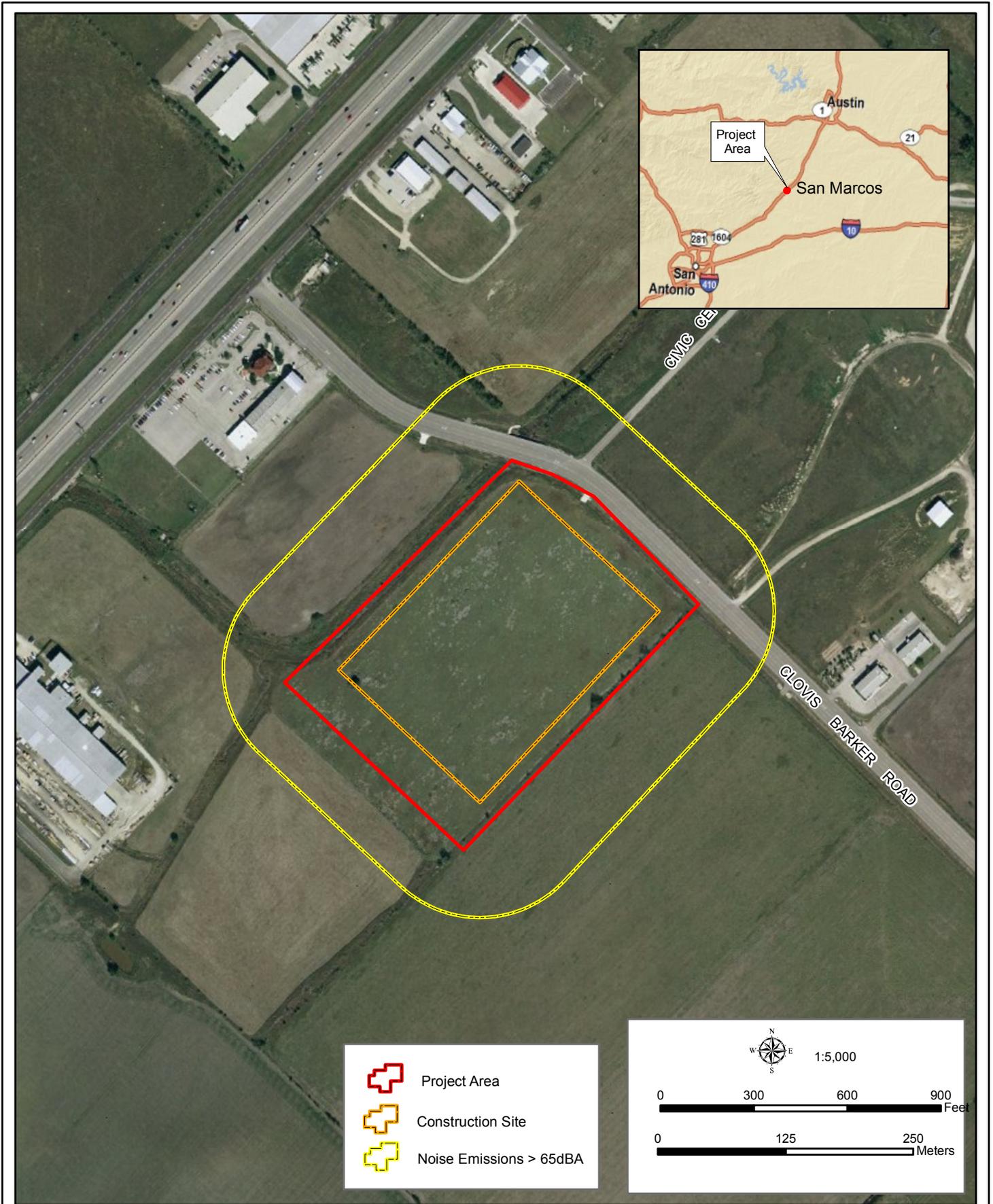


Figure 4-1: Preferred Site with 65 dBA Construction Noise Contour



October 2008

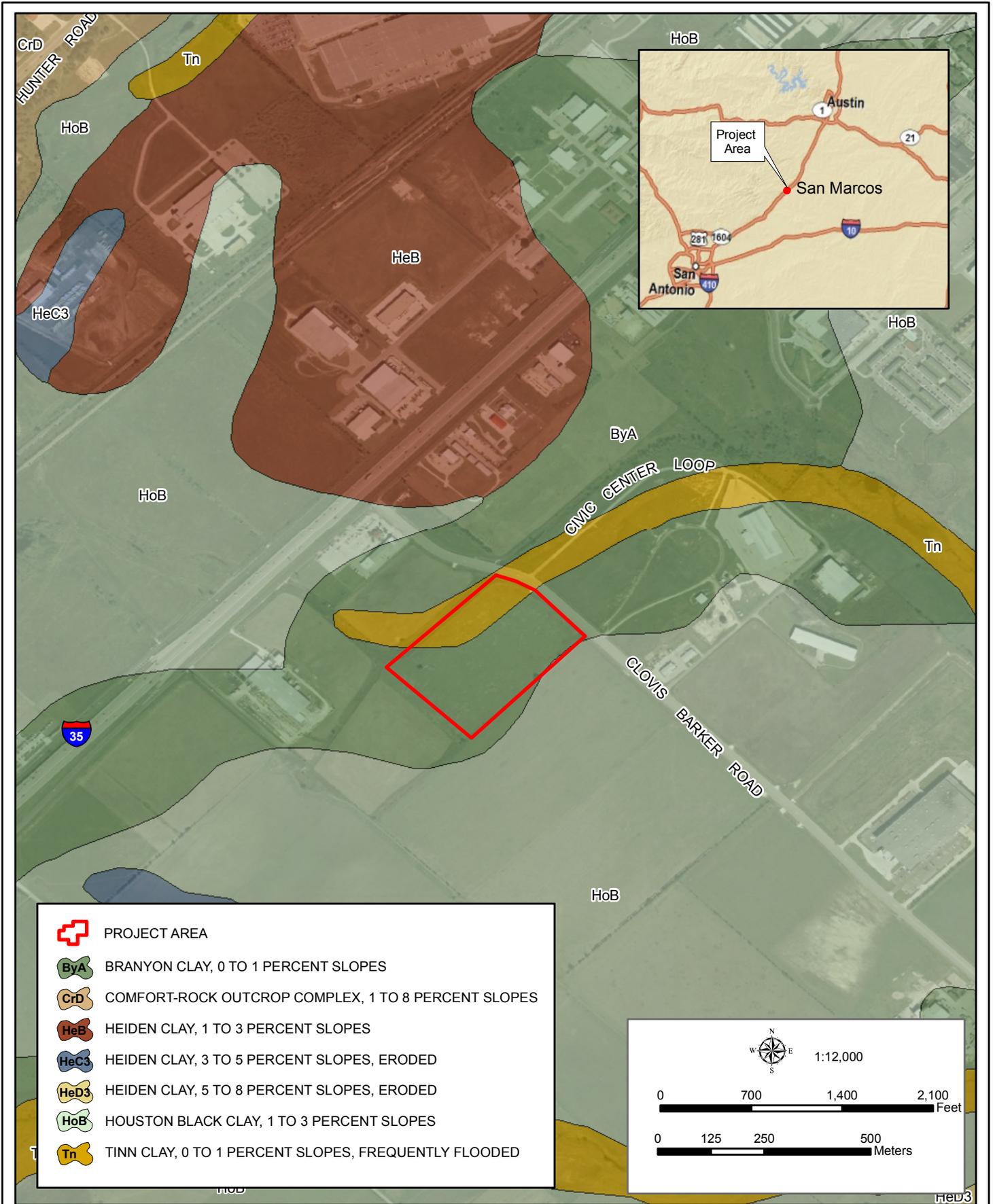


Figure 4-2: Preferred Site Soils Map

4.6.2 Environmental Consequences

4.6.2.1 Proposed Action Alternative

The Preferred Alternative site would impact approximately 14 acres of Branyon clay through conversion from undeveloped, tilled agricultural land to developed land with extensive impermeable surfaces. Indirect impacts on an additional 5 acres due to denied access could occur, which would affect another 2 acres of Branyon clay. The site is located adjacent to other agricultural land, as well as several nearby developed commercial areas adjacent to I-35, and a civic complex across Clovis Barker Road to the northeast. BMPs to prevent soil erosion, as described in Section 4.15, would be implemented to prevent soil migration off-site due to wind or rain activity, and a Texas Pollutant Discharge Elimination System (TPDES) permit for development would be obtained. Branyon clay is common in the San Marcos area, so the conversion of potential agricultural production capacity for 16 acres would not be considered a significant impact. An impact analysis on Form AD-1006 has been completed (see Appendix C), and confirmation of no significant impacts was obtained from NRCS in accordance with the Farmland Protection Policy Act.

4.6.2.2 No Action Alternative

Under the No Action alternative, there would be no conversion of prime farmland soils, since no new AFRC would be constructed.

4.7 Water Resources

4.7.1 Affected Environment

4.7.1.1 Surface Water

Surface waters within the vicinity of the preferred site are illustrated in Figure 4-3. The San Marcos USARC is located within the San Marcos Watershed. Willow Springs Creek and Purgatory Creek are located north of the preferred site approximately 1 and 1.5 miles, respectively. Cottonwood Creek is located approximately 0.5 miles south of the preferred site. In addition, one unnamed drainage is located within the preferred site, along the northwestern boundary. No waters within or near the preferred site have state approved designated uses and none are listed as impaired waters under the Clean Water Act (CWA) of 1972, Section 303(d) (Texas Commission on Environmental Quality [TCEQ] 2008).

Texas requires the completion of a Stormwater Discharge Permit for construction site erosion control, which is issued by the TCEQ, prior to initiation of construction. Through the permitting process, the Army would develop methods to minimize erosion and control stormwater runoff both during and after construction by utilizing BMPs and meeting performance standards established by the TCEQ. The Army would develop a site specific Stormwater Pollution Prevention Plan (SWPPP) and Erosion Control Plan describing the BMPs that would be used on-site for erosion control.

4.7.1.2 Hydrogeology/Groundwater

The preferred site overlies the Edwards (Balcones Fault Zone) Aquifer. The Edwards (Balcones Fault Zone) Aquifer is a major aquifer in the south central part of Texas. It consists primarily of partially dissolved limestone that creates a highly permeable aquifer. Aquifer thickness ranges from 200 to 600 feet, and freshwater saturated thickness averages 560 feet in the southern part of the aquifer. Water quality, although hard, is generally fresh and contains less than 500 milligrams per liter of total dissolved solids (Texas Water Development Board [TWDB] 2007).

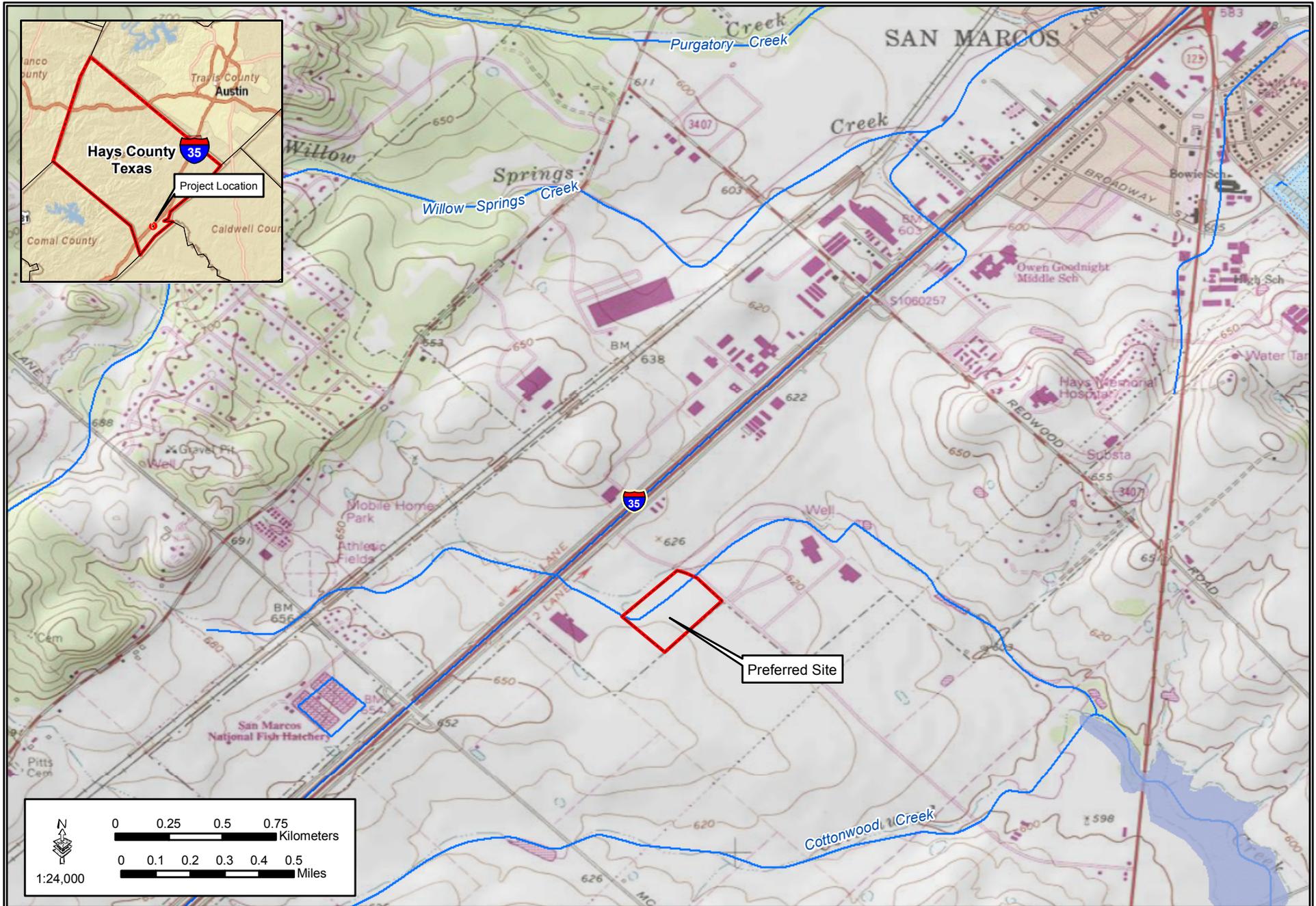


Figure 4-3: Major Streams near the Preferred Site

Water from the aquifer is primarily used for municipal, irrigation, and recreational purposes. The aquifer feeds several well-known springs, including San Marcos Springs in Hays County. Because of the aquifer's highly permeable nature, water levels and spring flows respond quickly to rainfall, drought, and pumping. Since the mid-1930s, the annual flow through the system has averaged about 680,000 acre-feet (Slattery and Brown 1999).

Runoff from urban areas often contains contaminants that could adversely affect streams and aquifers. The area of greatest concern is the recharge zone of the Edwards Aquifer, where point and non-point source runoff readily infiltrates the porous rock and flows into the main water-yielding zones of the aquifer. The threat of saline-water intrusion into the freshwater artesian zone of the aquifer during drought conditions is a perennial concern, particularly as pumping from the artesian zone increases. As indicated previously, the preferred site is located below the aquifer's recharge zone.

Currently, the quality of water in the Edwards Aquifer is "excellent" according to the Edwards Aquifer Authority (EAA), the state agency charged with managing, conserving, preserving, and protecting the aquifer. Comprehensive analyses of water samples from 88 wells in the Edwards Aquifer in urban, agricultural, and rangeland areas of the recharge and confined zones support this characterization. However, some water samples did contain detectable concentrations of pesticides and volatile organic compounds (VOCs), even though the levels were well below allowable maximums (Esquilin 1999).

4.7.1.3 Floodplain

EO 11988 (*Floodplain Management*) directs Federal agencies to avoid developments within floodplains. Floodways are defined as lands within the 100-year floodplain and have a 1 percent chance of becoming inundated by peak flows during any given year. Figure 4-4 depicts the floodplain and other surface water features at the preferred site. As can be seen, a portion of the preferred site is located within the 100-year floodplain. Consequently, the site plan was revised to relocate the detention basin and reduce the parking lot to avoid impacts to the floodplain.

The City of San Marcos requires the completion of a Watershed Protection Plan and Floodplain Development Permit prior to initiation of construction. Through the permitting process, the City and Army would develop methods to further minimize impacts within the 100-year floodplain and develop BMPs for post-construction operation of the facility,

4.7.2 Environmental Consequences

4.7.2.1 Proposed Action Alternative

The Proposed Action Alternative would not result in significant impacts to water resources. A SWPPP would be prepared and implemented to prevent impacts to surface waterbodies, and BMPs would be utilized, as appropriate. Since there would be no net gain in personnel at the new AFRC, water demand would likely be the same or slightly less due to new water conservation measures that would be incorporated to the AFRC's design and construction.

The 100-year floodplain encompasses 2.71 acres of the entire 19.13-acre preferred site, accounting for about one sixth of the site. Both a Watershed Protection Plan and Floodplain Development Permit would be prepared and implemented to prevent impacts within the 100-year floodplain and BMPs would be utilized, as appropriate. Furthermore, the design and layout of the proposed AFRC has been adjusted to avoid construction of conveyance impediments

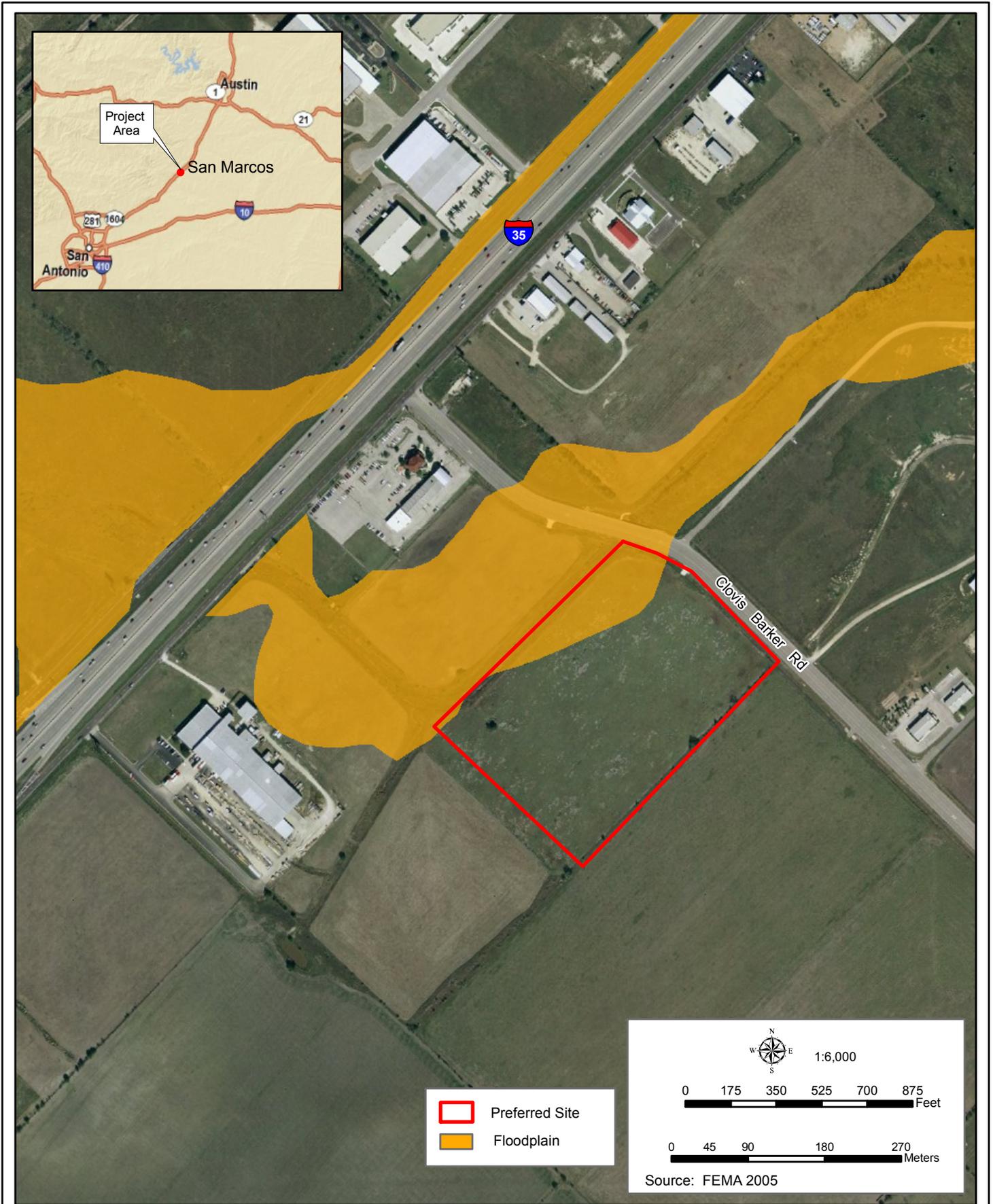


Figure 4-4: Floodplain Map



August 2008

(e.g., buildings, fences) within the floodplain to be in compliance with EO 11988. These adjustments include relocating the stormwater detention basin and eliminating a small portion of the front parking lot. These improvements would not increase flood risks, surface water elevations, duration, velocity or frequency.

4.7.2.2 No Action Alternative

Under the No Action Alternative, no new development would occur. Baseline conditions for surface and ground waters, as described above, would remain unchanged.

4.8 Biological Resources

4.8.1 Affected Environment

4.8.1.1 Vegetation

The Texas Parks and Wildlife Department's (TPWD) report entitled *The Vegetation Types of Texas* indicates the project site is located within the Edwards Plateau Area. Edwards Plateau is delineated along a physiographic province, not a biological unit; therefore, there is less botanical unity in the Edwards Plateau range types and sites (Tarleton State University 2008). The mapped vegetation type of the project site falls within the Crop type (TPWD 1984). Croplands are cultivated cover crops or row crops and provide either food or fiber to man or domestic animals (TPWD 1984).

A survey of the project site was conducted in August 2008. The project site is located in a cropland area; thus, the vegetation is sparse and consists primarily of corn crops (Photographs 4-1 and 4-2). Figure 2-1, shown previously, illustrates the lack of native vegetation at the project site.



Photograph 4-1. Preferred Site Looking WSW from NE Corner (June 2008)



Photograph 4-2. Remnants of Harvested Corn at the Preferred Site (August 2008)

A vegetative corridor exists along the eastern border and a few tree or shrub species exist across the site. During the August survey, blackberry (*Rubus* spp.), sugarberry (*Celtis laevigata*), honey mesquite (*Prosopis glandulosa*), and false willow (*Baccharis neglecta*) were observed in this corridor (Photograph 4-3). There is a mound on the southwestern portion of the site with two sugarberry trees and sunflowers (*Helianthus annuus*) growing on it (Photograph 4-4). Across the project site intermittently, switchgrass (*Panicum virgatum*), sideoats grama (*Bouteloua curtipendula*) and Johnsongrass (*Sorghum halepense*) were observed.



Photograph 4-3. Strip of Vegetation on the Eastern Edge of the Preferred Site



Photograph 4-4. Vegetated Mound in the Southwestern Corner of the Preferred Site

There were two ditches along the edges of the preferred site. On the northern edge of the preferred site, there was a small ditch running parallel to the project site and Clovis Barker Road. Johnsongrass, sunflowers, and goldenrod (*Solidago* sp.) were observed in the drainage. Along the northwestern, and edge borders of the preferred site, there was a larger ditch that contained various herbaceous and shrub or tree species, including cattails (*Typha* sp.), honey mesquite, false willow, sunflowers, goldenrod, and sugarberry.

4.8.1.2 Wildlife

Mammal species likely to occur in the Edwards Plateau include, but are not limited to, nutria (*Myocastor coypus*), Eastern pipstrelle, (*Pipistrellus subflavus*), Virginia opossum (*Didelphis virginiana*), red fox (*Vulpes vulpes*), coyote (*Canis latrans*) and Eastern cottontail (*Sylvilagus floridanus*) (U.S. Forest Service 2008). Small herbivore species known to occur in Hays County include Mexican ground squirrel (*Spermophilus mexicanus*), white-ankled mouse (*Peromyscus pectoralis*), and prairie vole (*Microtus ochrogaster*). Birds common to the area include loggerhead shrike (*Lanius ludovicianus*), scaled quail (*Callipepla squamata*), pyrrhuloxia (*Cardinalis sinuatus*), and long-billed thrasher (*Toxostoma longirostre*). Amphibians include Great Plains narrow-mouthed toad (*Gastrophryne olivacea*), green toad (*Bufo debilis*), and Texas toad (*Bufo speciosus*). Wildlife species or sign observed at the project site during recent surveys included loggerhead shrike, great-tailed grackle (*Quiscalus mexicanus*), white-footed mouse (*Peromyscus leucopus*), coyote (*Canis latrans*), and raccoon (*Procyon lotor*).

4.8.1.3 Sensitive Species

4.8.1.3.1 Federal

The USFWS is the primary agency responsible for implementing the Endangered Species Act (ESA), and is responsible for birds and other terrestrial and freshwater species. The USFWS has identified species that are listed as threatened or endangered, as well as candidates for listing as a result of identified threats to their continued existence. Although not protected by the ESA, candidate species may be protected under other Federal or state laws. Eleven Federally endangered species, one threatened species, and one candidate species inhabits Hays County, Texas (Table 4-5) (USFWS 2008). No suitable habitat for these species was observed on the project site; however, potential foraging habitat for the whooping crane is possible at the site. The ESA also calls for the conservation of what is termed critical habitat - the areas of land, water, and air space that an endangered species needs for survival. Critical habitat was

designated for four species in Hays County on July 14, 1980 (*Federal Register* Vol. 45, No. 136): the San Marcos salamander, the fountain darter, the San Marcos gambusia, and Texas wild-rice. There is no critical habitat for these four species at the project site. A concurrence letter was sent to the USFWS on 6 October and a response was received on 10 November 2008 (see Appendix C).

Table 4-5. Federally Listed Species Potentially Occurring Within Hays County, Texas

Common/Scientific Name	Federal Status	Habitat	Potential to occur within Project Site
BIRDS			
black-capped Vireo (<i>Vireo atricapilla</i>)	Endangered	Oak-juniper woodlands with a distinctive, two-layered aspect, shrub and tree layer with open grassy spaces.	No – the site project area lack multi-story canopies and foraging not likely due to lack of nesting sites and food sources.
golden-cheeked warbler (<i>Dendroica chrysoparia</i>)	Endangered	Ashe-juniper or cedar bark necessary for nest building.	No –not likely due to lack of materials for nest construction and food sources.
whooping crane (<i>Grus americana</i>)	Endangered, experimental	High plains, shortgrass prairies, and bare, dirt fields.	Yes – could forage but not likely due to lack of nesting sites and food sources.
AMPHIBIANS			
Austin blind salamander (<i>Eurycea waterlooensis</i>)	Candidate	The subterranean cavities of Edwards Aquifer, Travis County, Texas.	No – no suitable habitat at the project site.
Barton Springs salamander (<i>Eurycea sosorum</i>)	Endangered	Under rocks or in gravel in water several inches to 15 feet deep (TPWD 2007).	No – site does not have suitable habitat.
San Marcos salamander (<i>Eurycea nana</i>)	Threatened	Spring Lake and an adjacent downstream portion of the upper San Marcos River.	No – no suitable habitat at the project site.
Texas blind salamander (<i>Typhlomolge rathbuni</i>)	Endangered	Water-filled caves of the Edwards Aquifer.	No – no suitable habitat at the project site.
FISHES			
fountain darter (<i>Etheostoma fonticola</i>)	Endangered	Clean, spring-fed waters with bottom vegetation.	No – no suitable habitat at the project site.
San Marcos gambusia (<i>Gambusia georgei</i>)	Endangered	clear spring water coming from the headwaters of the San Marcos River	No – no suitable habitat at the project site.
FLOWERING PLANTS			
Texas wild-rice (<i>Zizania texana</i>)	Endangered	Clear flowing spring-fed waters.	No – no suitable habitat at the project site.
CRUSTACEANS			
Peck's cave amphipod (<i>Stygobromus</i> [= <i>Stygonectes</i>] <i>pecki</i>)	Endangered	Cave-like spring openings flowing from the Edwards Aquifer.	No – no suitable habitat at the project site.
INSECTS			
Comal Springs riffle beetle (<i>Heterelmis comalensis</i>)	Endangered	Primary spring-runs and from up-wellings underlying Landa Lake.	No – no suitable habitat at the project site.
Comal Springs dryopid beetle (<i>Stygoparnus comalensis</i>)	Endangered	Cave-like spring openings flowing from the Edwards Aquifer.	No – no suitable habitat at the project site.

Source: USFWS 2008.

4.8.1.3.2 State

The TPWD maintains the list of Rare, Threatened, and Endangered Species in Texas. This list includes fauna whose occurrence in Texas is or may be in jeopardy, or with known or perceived threats or population declines (TPWD 2007). These species are not necessarily the same as those protected by the Federal government under the ESA. Of the 50 rare, threatened, and endangered species known to occur in Hays County, two have the potential to occur within the project area (Table 4-6). However, none of these species were observed during the site survey and, due to the high levels of disturbance, it is very unlikely that any of these species occur within the project area. A concurrence letter was also submitted to TPWD on 6 October 2008 (Appendix C); however, a response has not been received to date.

Table 4-6. State Listed Species Potentially Occurring Within Project Area in Hays County, Texas

Common/Scientific Name	State Status	Habitat	Potential to occur within Project Site
MAMMALS			
Plains spotted skunk (<i>Spilogale putorius interrupta</i>)	Rare, but with no regulatory listing status	Open fields, prairies, cropland, fence rows, forest edges, and woodlands.	Yes – could forage but unlikely due to the high levels of disturbance.
REPTILES			
Texas horned lizard (<i>Phrynosoma cornutum</i>)	Threatened	Open, arid and semi-arid regions with sparse vegetation, including grass.	Yes – could burrow into soil at project site after crop is removed.

Source: TPWD 2007.

4.8.1.4 Wetlands

Section 404 of the CWA of 1977 (PL 95-217) authorizes the Secretary of the Army, acting through the USACE, to issue permits for the discharge of dredged or fill material into Waters of the U.S., including wetlands. Wetlands are those areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions (Environmental Laboratory 1987). No potential jurisdictional wetlands were observed on the preferred site during the field surveys; however, there is a potentially jurisdictional drainage that runs parallel to the west side of the project site. The drainage has been modified (channelized) and is maintained for stormwater conveyance.

4.8.2 Environmental Consequences

4.8.2.1 Proposed Action Alternative

The implementation of the Proposed Action Alternative would have permanent, but minimal, impacts on biological resources. The loss of agricultural fields and displacement of common wildlife is considered minimal due to the regional abundance of these resources. Because the site consists of an agricultural crop, there would be no direct impacts to natural vegetation communities and direct impacts to wildlife populations would be unlikely. There is no suitable habitat to support Federally threatened or endangered species at the project site; therefore, there would be no impacts to Federally-listed species. Two state listed species have the potential to be encountered within the project area; however, it is highly unlikely that any of these species occur at the project site. There would be no impacts to wetlands because no wetlands exist on the project site. Any impacts to the drainage, although not anticipated, would require that the appropriate USACE permits be obtained prior to such activities.

4.8.2.2 No Action Alternative

Under the No Action Alternative there would be no direct impacts to vegetation, wildlife, sensitive species, or wetlands. The existing USARC is located in a developed area and there are no sensitive species or vegetation communities nearby.

4.9 Cultural Resources

4.9.1 Affected Environment

Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, requires Federal agencies to identify and assess the effects of their undertakings on cultural properties included in or eligible for inclusion in the National Register of Historic Places (NRHP), and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings. Federal agencies must consult with the appropriate state and local officials, including the State Historic Preservation Officer (SHPO), Indian tribes, applicants for Federal assistance, and members of the public, and consider their views and concerns about historic preservation issues. The ACHP is authorized to promulgate such rules and regulations as it deems necessary to govern the implementation of Section 106 in its entirety. Those regulations are contained at 36 CFR Part 800, "Protection of Historic Properties".

4.9.1.1 Cultural Overview

Brockington and Associates performed a Phase I Cultural Resources Survey of the preferred site from June 23 to June 27, 2008. Prior to the field investigation, an archaeological assessment was conducted of the preferred site using the Texas Archaeological Site Atlas (TASA). The TASA indicated that one previous survey conducted by Horizon Environmental Services, Inc. (HES) in 2006 was conducted within 1 mile of the preferred site. The HES survey recorded one cultural resources site (41HY418) within the 1 mile vicinity of this preferred site. The site 41HY418 consisted of a low to moderate lithic scatter interpreted as a lithic procurement and early stage reduction site. The site was not recommended eligible for NRHP listing. The site is not located within the preferred site and no additional previously recorded cultural resources are present within 1 mile.

4.9.2 Environmental Consequences

4.9.2.1 Proposed Action Alternative

During Brockington and Associates' investigation of the preferred site, no cultural material was encountered. In addition, a pedestrian reconnaissance was performed of the view shed of the preferred site. No structures or buildings that meet the 50 year age minimum for historic structures were observed near the preferred site. As a result, no impacts to cultural resources are anticipated from the implementation of the proposed action alternative. No traditional cultural properties, resource procurement area, tribal resources, tribal rights, or sacred sites were identified during the recent investigations and past tribal consultations. Due to the lack of any identified properties and extensive site disturbance, it is highly unlikely that any buried deposits are present within the project site that would be considered significant to Native American or other traditional communities.

Native American tribes claiming a cultural affinity with the project area were identified using the Native American Consultation Database (NACD) and the Indian Lands Cessions 1784-1894 located online at the National Park Service's website along with records housed at the USACE and the tribes listed in the U.S. Army Reserve Integrated Cultural Resources Management Plan (ICRMP), 90th RRC, Texas. As a result, consultation letters were sent to the Apache Tribe of Oklahoma, the Mescalero Apache Tribe, the Comanche Nation, the Tonkawa Tribe of Indians of Oklahoma, and the Kiowa Tribe of Oklahoma. To date no tribes have expressed interest in the

proposed project and no traditional cultural properties, resource procurement areas, tribal resources, tribal rights, or sacred sites were identified during the recent investigations and past tribal consultations. Due to the lack of any identified properties, extensive site disturbance, and prior development of the project site, it is highly unlikely that any buried deposits are present within the project site that would be considered significant to Native American or other traditional communities.

A letter was also submitted to the Texas Historical Commission (THC, which is the SHPO) on October 8, 2008 requesting THC's concurrence of the Army's determination of no historic properties affected by the proposed project as per 36CFR800.4(d)(1). A letter of concurrence was received on 17 November 2008.

Prior to construction, the Army would brief the construction crews on procedures to follow in case of an unexpected discovery of cultural resources. If any cultural resources are uncovered during construction, the Army and THC would be notified, and all construction activities would stop until a qualified archaeologist could assess the significance of the cultural remains. If human remains are encountered, the local coroner and law enforcement agency would be contacted. If the remains are of Native American origin, compliance with the Native American Graves and Repatriation Act regulations would be required.

4.9.2.2 No Action Alternative

No adverse impacts on historical or cultural resources are anticipated from the implementation of the No Action Alternative, since no construction would occur.

4.10 Socioeconomic Resources

4.10.1 Affected Environment

4.10.1.1 Population

Caldwell, Comal and Hays counties are considered the Region of Influence (ROI) for the Proposed Action relative to socioeconomic effects. The ROI's population is presented in Table 4-7. At present, census data for Caldwell County is only available for the year 2000. As can be seen, the racial mix of the ROI consists predominantly of Caucasians, African Americans or some other race. The remainder is divided among Asians, people claiming to be two or more races, and Native Americans. Persons claiming Hispanic or Latino origins vary from 23 to 40 percent across the ROI (U.S. Census Bureau 2000, 2006a, 2006b, and 2006c).

Table 4-7. Population and Race

Geographic Region	Total Population	Race							
		White (%)	African American (%)	Native American (%)	Asian (%)	Native Hawaiian or other Pacific Islander (%)	Some Other Race (%)	Two or more Races (%)	Hispanic or Latino Origin of any Race (%)
Texas	23,507,783	69.8	11.6	0.5	3.3	0.1	13.0	1.8	35.7
Caldwell County (2000)	31,312	70.1	8.5	0.6	0.3	0.0	17.7	2.7	40.4
Comal County	101,181	87.3	1.6	0.4	0.7	0.0	7.8	2.2	23.9
Hays County	130,325	69.4	4.1	0.5	1.2	0.0	22.7	2.1	31.7

Source: U.S. Census Bureau 2000, 2006a, 2006b, and 2006c

4.10.1.2 Income and Employment

As shown in Table 4-8, in 2006 the counties in the ROI had a lower per capita personal income (PCPI) than the state and the Nation, with the exception of Comal County. The Comal County PCPI ranked 21st in the state, was 102 percent of the state average (\$35,166) and 96 percent of the National average (\$36,714). The 2006 PCPIs increased an average of 4.0 percent from 1996, less than the average annual growth rate of both the state (4.7 percent) and Nation (4.3 percent).

Table 4-8. 2006 Per Capita Personal Income (PCPI)

	Per Capita Personal Income	Rank	Percent State Average	Percent National Average	Average Annual Growth Rate 1996-2006 (%)
Nation (Average)	\$36,714	NA	NA	100	4.3
Texas (Average)	\$35,166	21	100	96	4.7
Caldwell County	\$23,659	198	67	64	4.0
Comal County	\$35,754	21	102	97	4.0
Hays County	\$27,860	114	79	76	4.0

NA=Not Applicable

Source: BEA 2006a, 2006b, 2006c, and 2006d

Total personal income (TPI) includes net earnings by place of residence; dividends, interest, and rent; and personal current transfer receipts received by the residents within the ROI. In 2006, the TPI across the ROI varied from \$858 million to \$3.7 billion and together accounted for 0.1 percent of the state total (Table 4-9). The 1996-2006 average annual growth rate of the TPI across the ROI was above both the TPI for the state and the Nation, with the exception of Caldwell County (6.2 percent). The average annual growth rate for the state was 6.8 percent (BEA 2006a).

Table 4-9. Total Personal Income

Geographic Region	Total Personal Income		2006 State Rank	Percent State Total	Average Annual Growth Rate 1996-2006 (%)
	1996	2006			
Texas	\$427,810,267,000	\$823,159,415,000	NA	100	6.8
Caldwell County	\$471,060,000	\$858,315,000	85	0.1	6.2
Comal County	\$1,614,928,000	\$3,578,119,000	33	0.4	8.3
Hays County	\$1,536,547,000	\$3,709,570,000	30	0.5	9.2

NA=Not Applicable

Source: BEA 2006a, 2006b, 2006c, and 2006d

The total number of jobs in the ROI was over 130,000 for 2006 (Table 4-10). The number of jobs is up between 6 percent and 26 percent from the number of jobs in 2001 across the ROI. The largest employer classification was government and government enterprises in Caldwell and Hays County and the retail trade sector employed the largest number of persons in Comal County (BEA 2006e). The unemployment rate in the ROI was lower than the unemployment rate for Texas in 2000 and the same or lower than the unemployment rate for Texas in 2006.

Table 4-10. Total Number of Jobs and Employment

Geographic Area	Total Number of Jobs			Unemployment Rate	
	2001	2006	% Change	2000 (%)	2006 (%)
Texas	12,356,260	13,514,130	9.37	4.4	4.9
Caldwell County	11,549	12,266	6.2	4.1	4.9
Comal County	42,806	51,006	19.2	3.6	4.1
Hays County	52,804	66,755	26.4	3.3	4.2

Source: BEA 2001 and 2006, Real Estate Center 2008a, 2008b, 2008c, and 2008d, and Tracer 2008

In 2005, the percentage of all people in poverty in the ROI averaged 13 percent (Table 4-11). This percentage is less than the percentage of people below the poverty level for the State of Texas (17.5 percent) and the U.S. (13.3 percent). Caldwell County, when considered alone, has a higher percentage of people in poverty than the state or Nation. Median household income within the ROI is higher than the median household income for the State of Texas, with the exception of Caldwell County, which is \$3,169 lower than the median household income for the state.

Table 4-11. 2005 Poverty and Median Income for the Nation, State of Texas, and Across the ROI

Geographic Location	Number in Poverty of All Ages	Percentage in Poverty	Median Income
Nation	38,231,474	13.3	\$46,242
Texas	3,886,632	17.5	\$42,165
Caldwell County	6,585	19.0	\$38,996
Comal County	8,936	9.5	\$53,643
Hays County	15,057	13.1	\$45,060

Source: U.S. Census Bureau 2005

4.10.1.3 Housing

The total number of housing units in the two counties with data available for 2006 was over 89,000 in 2006 (Table 4-12), of which over 88 percent were occupied. Approximately 61 percent of the housing units were owner-occupied. Comparatively, the owner-occupied houses for the state were estimated at 57 percent (U.S. Census Bureau 2006a). In 2000, Caldwell County had 11,901 available housing units, of which over 90 percent were occupied, and over 69 percent were owner-occupied.

Table 4-12. Housing Units

Location	Total Housing Units	Status		
		Occupied		Vacant
		Owner	Rented	
Texas	9,224,920	5,291,045	2,818,343	1,115,532
Caldwell County (2000)	11,901	7,535	3,281	1,085
Comal County	42,287	27,675	8,972	5,640
Hays County	46,987	27,106	15,444	4,437

Source: U.S. Census Bureau 2000, 2006a, 2006b, and 2006c

4.10.1.4 Environmental Justice

EO 12898 (*Environmental Justice*) requires all Federal agencies to identify and address disproportionately high and adverse effect of their programs, policies, and activities on minority and low-income populations. As indicated previously, the majority of the population in the ROI claims to be Caucasians, between 23 and 40 percent claim Hispanic origin and from 1 to 8 percent (across the five counties) claim to be African American. Additionally, between 9 and 19 percent of the ROI population is considered to live below the poverty level. Consequently, there is little potential for the BRAC actions to encounter environmental justice issues within the ROI.

4.10.1.5 Protection of Children

EO 13045 (*Protection of Children*) requires each Federal agency “to identify and assess environmental health risks and safety risks that may disproportionately affect children”; and “ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.” In the ROI, between 6 and 7 percent of the population is 5 years old or less and between 23 and 28 percent are younger than 18 years (Table 4-13; U.S. Census Bureau 2000, 2006a, 2006b, and 2006c). Potential protection of children issues arise when an action is near residential areas or schools.

Table 4-13. Population of Persons Younger than Eighteen Years Old

Location	5 Years Old or Less (Percent)	Less than 18 Years Old (Percent)
Texas	8.2	27.7
Caldwell County (2000)	7.4	28.3
Comal County	6.0	23.2
Hays County	6.9	23.6

Source: U.S. Census Bureau 2000, 2006a, 2006b, and 2006c

4.10.2 Environmental Consequences

4.10.2.1 Proposed Action Alternative

The proposed establishment of the AFRC and the realignment of the San Marcos USARC would not result in a gain of military or civilian personnel. The Proposed Action Alternative would not adversely affect local income, employment rates, or poverty levels. There are no concentrations of minority populations or children near the Proposed Action Alternative. No

displacements of residences or businesses would be required and the construction area would be restricted to authorized personnel. Therefore, no disproportionate impacts to minority or low-income families or effects to children would occur as a result of the proposed action or alternatives and the project would be in compliance with EO 12898 and EO 13045. Any materials or services purchased locally and any local hiring during construction would result in short-term negligible socioeconomic benefits. The Proposed Action Alternative would have no adverse effect on the socioeconomic conditions within the ROI. To further document the potential effects, a model of economic effects was run using the Economic Impact Forecast System (EIFS). The EIFS results indicated no net change in the long-term economy within the ROI. A copy of the EIFS results is presented in Appendix D.

4.10.2.2 No Action Alternative

Under the No Action Alternative, socioeconomic conditions would remain status quo.

4.11 Transportation

4.11.1 Affected Environment

Numerous modes of transportation are available to serve the preferred site, including air, rail, and highway access. The San Marcos Municipal Airport is located approximately 6 miles northeast of the preferred site and provides general aviation services for small commuter planes (Figure 4-5). The Austin Bergstrom International Airport located in Austin, Texas approximately 30 miles northeast of the proposed San Marcos AFRC provides cargo shipment services and passenger flights to many U.S. destinations as well as international cities. The San Marcos Station is located approximately 2 miles northeast of the preferred site and provides Amtrak passenger rail services. The Capitol Area Rapid Transit System (CARTS) also operates out of the San Marcos Station and provides passenger commuter bus services to 169 communities and nine counties in south central Texas.

The preferred site is located on the south side of Highway 269 (Clovis R. Barker Road) and is served by many state and local roads (see Figure 4-5). I-35 is located less than 0.25 mile west of the site, and is a main north-south thoroughfare connecting San Marcos to Austin and Dallas to the north and San Antonio to the south. Other major thoroughfares in and around San Marcos include Highway 82/123 (Guadalupe Road) and Highway 80 (Hopkins Road) which provide access to the San Marcos business district from I-35. Vehicular traffic access to the preferred site from I-35 is available via Highway 233 (McCarty Lane) or Highway 3407 (Wonder World Drive), and the north and southbound frontage roads adjacent to I-35. Traffic flow patterns show that most vehicles traveling on major transportation arteries through or within the city limits of San Marcos are primarily concentrated within a 1.5 mile radius of the Highway 82 and I-35 interchange (Texas Department of Transportation [TxDOT] 2007a). According to TxDOT 2006 traffic data, an average of 78,000 vehicles per day utilize I-35, where San Marcos traffic volumes are most concentrated, while an average of 23,500 vehicles per day travel on highways and surface streets near the I-35/Highway 82 intersection, located 2 miles north of the preferred site (TxDOT 2007b). Average traffic volume on Wonder World Drive, 0.8 mile north of the preferred site, is approximately 17,600 vehicles per day (TxDOT 2007b).

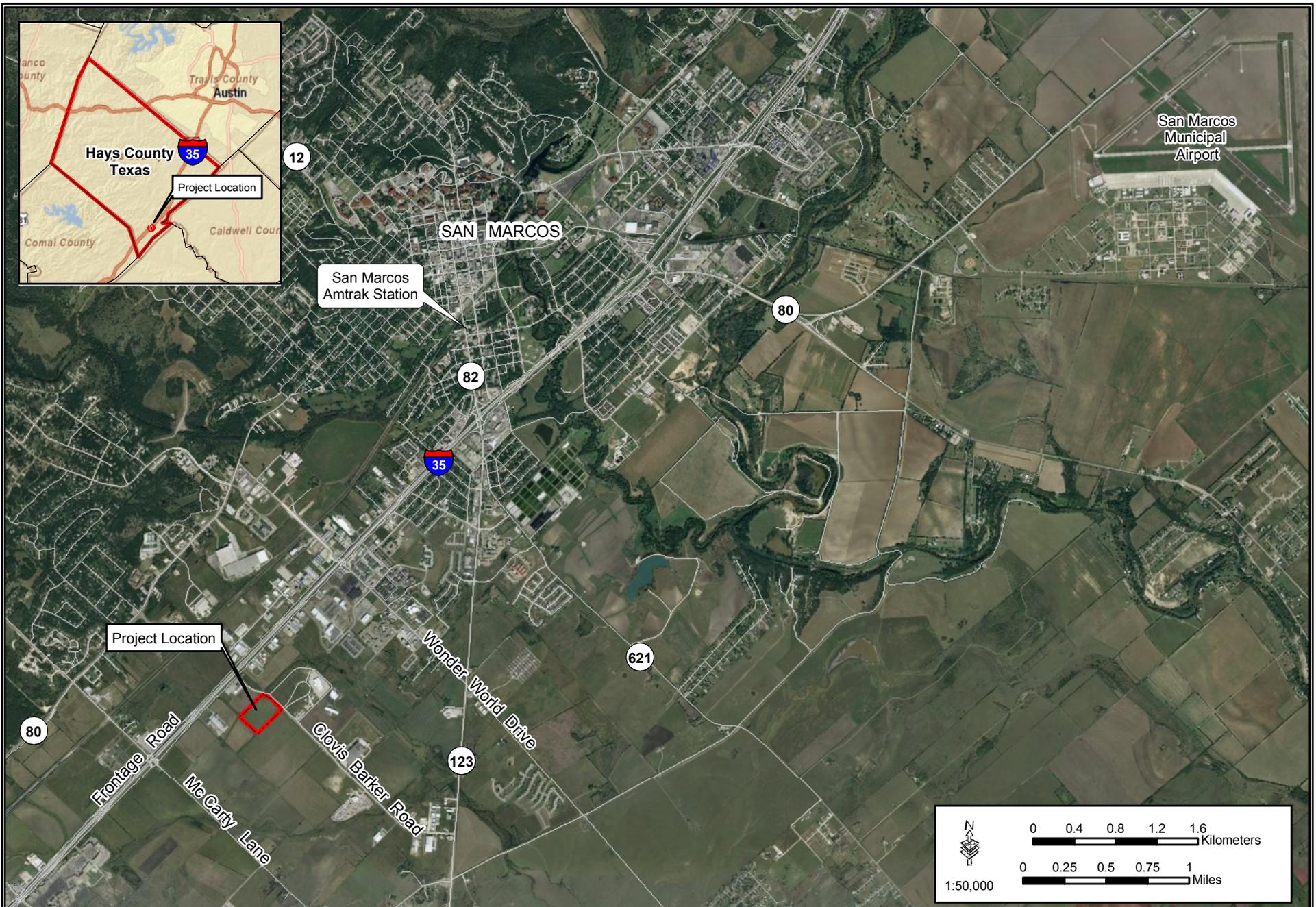


Figure 4-5: Transportation Map

4.11.2 Environmental Consequences

4.11.2.1 Proposed Action Alternative

Construction of the AFRC would have no effect on regional air or rail service. Vehicle traffic at the site would be increased by approximately 44 vehicles per day during the construction period, primarily along I-35, Clovis R. Barker Road, McCarty Lane, Wonder World Drive, and the north and southbound I-35 frontage roads. This increase in daily traffic volume would consist of four delivery trucks and approximately 40 construction personnel passenger vehicles.

Operation of the AFRC would also create occasional moderate increases on these same streets. Congestion would occur primarily along the route including Clovis R. Barker Road, McCarty Lane, Wonder World Drive and the I-35 frontage roads which provide direct access to the site from I-35. As mentioned previously, approximately 10 to 15 additional vehicles would be expected to access the site 240 days per year, as a result of the implementation of the Proposed Action Alternative. This relatively low number of vehicles represents less than a 0.1 percent addition to the traffic volume in this area. The majority of the increased traffic would occur during two weekends per month, particularly when USAR units are conducting training activities. During training periods, it is anticipated that daily traffic volumes would increase by approximately 70 vehicles, which accounts for less than 0.6 percent of the average daily traffic volume on surface streets near the Complex. Therefore, construction and operation of the AFRC would result in minimal adverse impacts on the traffic around the new San Marcos AFRC.

4.11.2.2 No Action Alternative

Under the No Action Alternative, there would be no effect on vehicle traffic at or around the construction site of the proposed San Marcos AFRC. Regional air and rail service would also be maintained at status quo.

4.12 Utilities

4.12.1 Affected Environment

4.12.1.1 Potable Water Supply

The City of San Marcos, which supplies drinking water to entities within the project area, obtains their water from the Canyon Lake (75 percent) and the Edwards Aquifer (25 percent). Large water supply lines (12 inch) are located immediately adjacent to the preferred site on Clovis Barker Road.

4.12.1.2 Wastewater System

The City of San Marcos has several sewerage lines adjacent to the preferred site. An 18-inch sewerage pipe is located immediately to the northwest running parallel with I-35. Other lines include 8- and 6-inch sewerage pipes located to the northeast; an 8-inch pipe running parallel to the north side of Clovis Barker Road, and a 6-inch pipe that parallels the opposite side north of Clovis Barker Road.

4.12.1.3 Stormwater System

Drainage canals are located adjacent to the preferred site, parallel to Clovis Barker Road and along the western boundary of the site. Flow is to the west and southwest, respectively, in these canals.

4.12.1.4 Electric and Gas

The City of San Marcos supplies electricity in the region and would be the likely provider to the proposed AFRC. The City of San Marcos has electrical mains buried immediately northeast of the project site parallel to Clovis Barker Road. Center Point Energy is the regional natural gas

provider. Gas lines are immediately adjacent to the preferred site, buried parallel to Clovis Barker Road.

4.12.2 Environmental Consequences

4.12.2.1 Proposed Action Alternative

The construction of the new AFRC would have minimal effects on the regional potable water supply, wastewater treatment system and stormwater discharges. Construction crews would bring water on-site for their personnel, and portable latrines would collect sanitary waste. Since the site is greater than 1 acre, a Stormwater Discharge Permit for General Construction would be required prior to construction. This permit would require that a SWPPP and Notice of Intent be prepared and filed with the EPA through the TCEQ. The SWPPP would identify BMPs that are required to be implemented to control stormwater erosion and runoff from the site and sedimentation into downstream areas. Upon completion of the construction activities, all disturbed areas that are not going to be landscaped and routinely maintained should be reseeded with native vegetation.

Operation of the AFRC would not result in increases in demand on the city's drinking water supply and wastewater treatment system, since the units would be realigned from the San Marcos USARC, located only 3 miles away. As indicated above, there is sufficient capacity with both supply and treatment systems to accommodate the proposed construction and operation of the AFRC.

4.12.2.2 No Action Alternative

Under the No Action Alternative, construction of the AFRC would not occur; thus, no effects would occur considering the existing USARC's stormwater system or existing discharges. Furthermore, no additional demands, temporary or long-term, on San Marco's utility supply or wastewater treatment systems would occur under this alternative.

4.13 Hazardous and Toxic Substances

4.13.1 Affected Environment

The preferred site consists of an open agricultural field, with no visible evidence of hazardous or toxic materials present. There is a potential for residual agricultural chemicals in the soil from past use. There are no treatment, storage, or disposal facilities or special hazards located on or adjacent to the proposed action site.

4.13.2 Environmental Consequences

4.13.2.1 Proposed Action Alternative

The potential exists for storage or minor amounts of petroleum, oils and lubricants (POL) at the proposed AFRC to maintain and fuel equipment and vehicles during construction; however, these activities would include primary and secondary containment measures. Clean-up materials (e.g., oil mops) would also be maintained at the site to allow immediate action in case an accidental spill occurs. Drip pans would be provided for stationary equipment to capture any POL accidentally spilled during maintenance activities or leaks from the equipment. In addition, as part of the construction contract, the contractor would follow BMPs to control leaks and spills and submit an application for a TPDES permit, as required, and all personnel would be briefed on the implementation and responsibilities for the BMPs during construction.

Solvents and cleaners could be stored at the AFRC following construction. The AFRC vehicle maintenance shop would recycle parts cleaner solution, and would maintain POL in small

quantities for equipment maintenance. Hazardous materials and waste generated would be disposed of through an approved contractor according to state and Federal regulations.

Therefore, the proposed action would not result in a significant hazard to the public or the environment resulting from the transport, use, or disposal of hazardous materials.

4.13.2.2 No Action Alternative

Without the construction and operation of a new AFRC, there would be no additional potential for spills of hazardous materials during construction.

4.14 Cumulative Effects Summary

This section of the EA addresses the potential cumulative impacts associated with the implementation of the alternatives and other projects/programs that are planned for the region. The CEQ defines cumulative impacts as the incremental impact of multiple present and future actions with individually minor but collectively significant effects. Cumulative impacts can be concisely defined as the total effect of multiple land uses and developments, including their interrelationships, on the environment.

The preferred site and the lands surrounding the site have been used extensively for agricultural, residential, and light industrial purposes for decades; as such, the site is and has been disturbed. The proposed construction and operation of the AFRC would increase the developed areas in the project area by 14 acres, and remove another 5 acres from other potential uses. Operation of the AFRC would not result in cumulative impacts on training ranges or air space, ambient noise levels, water quality or supply, or air quality. Transportation routes and demands would be increased, primarily on the weekends when most or all of the Reserve Units would arrive. According to the City of San Marco's Planning Department (Foreman 2008), no plans for development or other improvements are known for this site and the immediate surrounding lands. The establishment of the AFRC, when combined with other proposed developments, will have insignificant cumulative impacts on land use or biological resources at and surrounding the preferred site.

Cumulative effects on air quality from the Proposed Action Alternative, when combined with other on-going projects, would be insignificant and would remain below *de minimis* thresholds. Operation of the AFRC would add to the cumulative amount of hazardous wastes generated in the project area. However, all wastes are disposed by licensed contractors in accordance with state and Federal regulations; consequently, insignificant cumulative adverse impacts would be expected.

If, at some point, USAR requires expansion of the AFRC to accommodate additional units or other mission support requirements, the remaining 5 acres could be developed. Similar impacts on the human and natural environment would occur, and would be addressed in supplemental NEPA documents, as appropriate. Still, the alteration of 19 acres of crop land would not result in significant cumulative impacts on any of the identified resources.

4.15 Best Management Practices (BMPs)

This section of the EA describes those measures that could be implemented to further reduce or eliminate potential adverse impacts on the human and natural environment. The BMPs are presented for each resource category that could be potentially affected. These proposed measures would be coordinated through the appropriate regulatory agencies.

4.15.1 Vegetation and Wildlife

Native seeds or plants, which are compatible with the enhancement of protected species, would be used to the extent feasible, as required under Section 7(a)(1) of the ESA, to reseed temporarily disturbed areas once construction is complete. This effort would apply only to those areas that would not be expected to be part of the permanent landscaped or maintained areas of the AFRC.

The Migratory Bird Treaty Act requires that private contractors obtain a construction permit if the construction activity is scheduled during the nesting season. The nesting season for this area is typically March 15 through September 15. Active nests would need to be identified and avoided to the extent practicable. Another BMP that would be considered is to schedule all construction activities outside the nesting season.

Additional measures would include BMPs, as described previously, during construction to minimize or prevent erosion and soil loss. If straw bales are used as part of the BMPs, weed seed-free straw bales would be used to eliminate the potential of spreading invasive species, to the extent practicable.

4.15.2 Air Quality

As mentioned previously, emissions associated with construction activities would be insignificant and well below *de minimis* thresholds. Proper and routine maintenance of all vehicles and other equipment would be implemented to ensure that emissions are within the design standards of all construction equipment. Dust suppression methods would be implemented to minimize fugitive dust.

4.15.3 Water Resources

The proposed construction activities would require a SWPPP, which would be prepared and submitted to the TCEQ and EPA, as part of the TPDES permit process. The SWPPP would identify BMPs that would be implemented before, during, and after construction.

4.15.4 Cultural Resources

Prior to construction, the Army would brief the construction crews on procedures to follow in case of an unexpected discovery of cultural resources. If any cultural resources are uncovered during construction, the Army and the THC would be notified, and all construction activities would stop until a qualified archaeologist could assess the significance of the cultural remains. If human remains are encountered, the local coroner and law enforcement agency would be contacted. If the remains are of Native American origin, compliance with the Native American Graves and Repatriation Act regulations would be required.

4.15.5 Hazardous and Toxic Substances

Hazardous and toxic materials/wastes at the project site during construction would likely consist of POL. If hazardous waste is generated, it would be disposed of according to Federal, state and local regulations, as well as existing Army regulations and procedures. No maintenance of construction equipment would be conducted on-site, minimizing the potential for spills or direct contact with POLs. Equipment and vehicles parked overnight, or left for lengthy periods on-site, would be fitted with drip pans. On-site use of construction equipment, use of chemical products, and wastes generated during construction would comply with all Federal, state, and local regulations relating to protecting the environment from hazardous materials and containing spills. No large quantities of hazardous wastes would be stored on the site.

In addition, USAR would incorporate sustainability and greening practices in daily operations through cost-effective waste reduction, recycling of reusable materials and purchase of items produced using recovered materials, in compliance with EO 13148.

SECTION 5.0
FINDINGS AND CONCLUSIONS

5.0 Findings and Conclusions

5.1 Findings

5.1.1 Consequences of the Proposed Action Alternative

The Proposed Action Alternative would result in the permanent conversion of up to 14 acres of disturbed grassland to hard surfaces and buildings, and removal of another 5 acres from future crop production and other private uses. The preferred site is zoned as industrial and, thus, would conform to the city's zoning ordinances and does not conflict with the city's current development plans for the project area. No impacts on Federal or state protected species would occur. No violations of air or water quality standards would be expected; BMPs would be implemented to ensure stormwater, during and after construction, is controlled and downstream sedimentation is either eliminated or is negligible. Temporary increases in noise would be expected during the construction. Transportation would be increased during and after construction. Approximately 12 full-time employees are expected to commute to the AFRC on a daily basis. Most of the increases in traffic (up to 100 vehicles) associated with the AFRC would occur on weekends, however. No long-term impacts relative to utilities or hazardous waste and materials would be expected from the proposed construction and operation of the AFRC.

Some benefits for local and regional employment and personal income would be expected during the construction. However, these benefits would be insignificant when compared to the Round Rock – Austin MSA. A summary of the potential effects from the Proposed Action Alternative and No Action Alternative is presented in Table 5-1 on the following page.

5.1.2 Consequences of the No Action Alternative

Under the No Action Alternative, the existing human and natural environment at the preferred site would remain status quo, at least for the short-term. Since the area is under private ownership and is currently used for agricultural crop production, there is a possibility that the proposed project site could be developed at some point in the future.

5.2 Conclusions

Based on the information presented in the previous sections, it is concluded that the best available site for the proposed construction and operation of the AFRC is at the preferred site, and that development of this site would result in insignificant adverse impacts on the area's human and natural environment. Therefore, issuance of a FNSI is warranted and no additional NEPA documentation (i.e., Environmental Impact Statement) is required.

Table 5-1. Summary Matrix of Potential Impacts

Affected Resource	No Action Alternative	Proposed Action Alternative
Land Use	No impacts on land use are expected.	Up to 14 acres of crop land would be converted to the facility and parking areas. The facility is consistent with the City of San Marcos' Master Plan, which designates the site as a heavy to light industrial.
Aesthetics	No adverse impacts are expected.	Slight degradation during construction, but no significant long-term impacts would occur on the project area's visual qualities.
Air Quality	No adverse effects are anticipated.	Negligible temporary effects on air quality during construction would occur. Pre-project conditions would return upon cessation of construction activities. All emissions would be below <i>de minimis</i> thresholds.
Noise	No adverse impacts are expected.	Negligible temporary increases in ambient noise levels during construction. Pre-project conditions would return upon cessation of construction activities. Operation of the facility would be expected to produce negligible increases in ambient noise levels.
Soils	No impacts on soils are expected.	Up to 14 acres of soil would be disturbed and permanently removed from potential biological and agricultural productivity. Concurrence that the loss of 14 acres of prime farmland soils would be insignificant relative the rest of Hays County has been requested from NRCS.
Water Resources	No adverse impacts would occur.	No significant impact on the region's water supply or water quality. No potentially jurisdictional wetlands occur on the proposed site.
Biological Resources	No impacts are expected.	Up to 14 acres of crop land would be permanently removed. No effects on threatened or endangered species would occur.
Cultural Resources	No effects are anticipated.	No impacts are expected.
Socioeconomics	No effect on the regional or local economy would be expected.	Negligible temporary, but beneficial, effects for the City of San Marcos during construction.
Transportation	No adverse impacts are expected.	Slight increase in local traffic along Clovis Barker Road, I-35, Highway 82 and its frontage roads during construction; no major congestion is expected. Traffic would be increased (by about 0.6 percent) on these same streets once the relocation is complete.
Utilities	No adverse impacts are expected.	Slight increase in the demands on the City of San Marcos' public systems. More than sufficient capacity is available to meet these demands.
Hazardous Materials	No adverse impacts are expected.	No impacts are expected to occur.

SECTION 6.0
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6.0 References

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SECTION 7.0
LIST OF PREPARERS



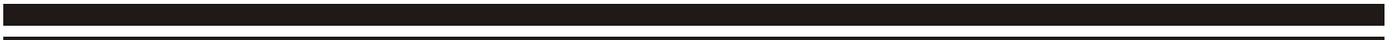
7.0 List of Preparers

The following people were primarily responsible for preparing this Environmental Assessment.

NAME	AGENCY/ORGANIZATION	DISCIPLINE/EXPERTISE	EXPERIENCE	ROLE IN PREPARING EA
Larry Olliff	USACE Mobile/Savannah District	Environmental Studies	7 years in NEPA and 18 years in environmental studies	USACE Technical Manager
Suna Adam Knaus	GSRC	Forestry/Wildlife	19 years natural resources	EA review
Chris Ingram	GSRC	Biology/Ecology	33 years NEPA and natural resources	Project Manager, DOPAA, biological resources
Eric Webb, Ph.D.	GSRC	Ecology/Wetlands	19 years natural resources and NEPA Studies	EA Technical Review
John Lindemuth	GSRC	Archaeology	16 years Professional Archaeologist/Cultural Resources	EA preparation; cultural resources
Steve Oivanki, RPG	GSRC	Geology/Soils	33 years geological and NEPA studies	EA preparation; soils
Shanna McCarty	GSRC	Ecology	2 years NEPA and natural resources	EA preparation; socioeconomics
Steve Kolian	GSRC	Environmental Studies	13 years environmental and marine science	EA preparation; air and water quality
Curt Schaeffer	GSRC	Wetlands/Biological	7 years wetlands and NEPA studies	EA preparation; utilities and hazardous waste
Carey Perry	GSRC	Biology/Ecology	1 year natural resources	EA preparation; land use, aesthetics; water resources
Ron Webster	Ray Clark Group, LLC	Socioeconomics/Civil Engineering	35 years NEPA studies and socioeconomic analyses	EIFS modeling and analysis

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SECTION 8.0
ACRONYMS AND ABBREVIATIONS



8.0 Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
AFRC	Armed Forces Reserve Center
ASIV	Available Site Identification and Validation
AT/FP	anti-terrorism/force protection
BEA	Bureau of Economic Analysis
BMP	best management practices
BNSF	Burlington Northern Santa Fe Railroad
BRAC Commission	Defense Base Closure and Realignment Commission
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon monoxide
CWA	Clean Water Act
dB	decibel
dBA	decibels A-weighted scale
DNL	Day-Night Level
DoD	Department of Defense
EA	Environmental Assessment
EAA	Edwards Aquifer Authority
ECHO	Enforcement and Compliance History Online
EIFS	Economic Impact Forecast System
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FNSI	Finding of No Significant Impact
FY	Fiscal Year
HVAC	heating, ventilation, and air conditioning
I	Interstate
INRMP	Integrated Natural Resources Management Plan
MBTA	Migratory Bird Treaty Act
MGD	million gallons per day
MSA	Metropolitan Statistical Area
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act
NO ₂	nitrogen dioxide
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
O ₃	Ozone
PCPI	per capita personal income
PM-10	particulate matter less than 10 microns
PM-2.5	particulate matter less than 2.5 microns
POL	petroleum, oils, and lubricants
ROI	region of influence
RRC	Regional Readiness Command
SF	square feet
SHPO	State Historic Preservation Officer
SR	State Route

SWPPP	Stormwater Pollution Prevention Plan
TASA	Texas Archaeological Site Atlas
TCEQ	Texas Commission on Environmental Quality
THC	Texas Historical Commission
TPDES	Texas Pollutant Discharge Elimination System
TPWD	Texas Parks and Wildlife Department
TWDB	Texas Water Development Board
TXARNG	Texas Army National Guard
TPI	total personal income
TxDOT	Texas Department of Transportation
USACE	U.S. Army Corps of Engineers
USAR	U.S. Army Reserve
USARC	U.S. Army Reserve Center
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
VOC	Volatile organic compound

APPENDIX A
ASIV and Site Survey Report



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON DC 20310-2400

DAIM-ODR

6 DEC 07

MEMORANDUM FOR U.S. Army Corps of Engineers, Louisville District (CERE-AM),
P.O. Box 59, Louisville, KY 40201-0059

SUBJECT: Approval to Acquire Land for Construction of an Armed Forces Reserve
Center (AFRC) in San Marcos, Texas

1. Reference Memorandum 90th Regional Readiness Command, AFRC-CAR-ENP,
18 October 2007, subject: Site Survey Report (SSR), San Marcos, Texas, enclosed.
2. Request you acquire an option on site # 7, approximately 19.13 ± acres, located on
the South side of Clovis Barker Road, east of I-35 in San Marcos, Texas as identified in
the Site Survey Report (SSR). Site # 7 is the primary site selected for the Army
Reserve Base Realignment and Closure (BRAC) Fiscal Year 2009 Military Construction
project Number 64469. Approximately 12 ± acres are required for the Army Reserve
Center project in San Marcos, Texas. Site # 7 consists of 19.13 ± acres and because of
land configuration subdividing the land would render the remaining portion
uneconomical to the land owner therefore we are requesting acquisition of the entire
parcel. The total asking price for site # 7 is \$2.1M. The purchase option will allow the
Army time to accomplish the appropriate Environmental and Engineering Feasibility
studies to determine the site's suitability for the BRAC construction project prior to
acquisition authorization. If the land is determined to be suitable the U.S. Army Corps
of Engineers (USACE) will be directed to purchase the land in fiscal year 2009.
Request a Real Estate Planning Report (REPR) be completed for this acquisition.
3. My POCs are Major Gregory Scott, DAIM-ODR, 703-601-1937, email:
Gregory.Scott@hqda.army.mil and for Real Estate it is Ms. LaSandra Miller, IMAR, 703-
602-1889, email: Lasandra.miller@hqda.army.mil.

FOR THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT

Encl
as

CF:
90th RRC (AFRC-CAR-EN/Ms. Rachel White)
USACE (CERE-AM/Ms. Peggy Mahoney)


H.T. LANDWERMEYER JR.
Brigadier General, U.S. Army
Director, Operations



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205

AFRC-CAR-ENP

18 October 2007

MEMORANDUM THRU Installation Management Command, Army Reserve, ATTN: Mr. Alfonso Golden, 2511 Jefferson Davis Highway, Taylor Building 10th Floor, Arlington, VA 22202-3926

Headquarters, Department of the Army, Assistant Chief of Staff for Installation Management, ATTN: DAIM-AR (Ms. Chuck), 600 Army Pentagon, Washington, DC 20310-0600

SUBJECT: Site Survey Report (SSR), San Marcos, Texas

1. Enclosed is the Site Survey Report (SSR) pertaining to the acquisition of twelve (12) (+or-) acres site to support an FY 2009 BRAC Construction Army (BCA) project (Project Number 64469) to construct a 600 Member Armed Forces Reserve Center in San Marcos, Texas, for the 90th RSC and the Texas Army National Guard. This project will provide land and a 600 member Armed Forces Reserve Center training facility with Multi-use Classroom - Barracks, Organizational Maintenance Shop (OMS), and an unheated storage for the Army Reserve and the Army National Guard. The maintenance shop will provide work bays and maintenance administrative support. The project will also provide for unit storage and adequate parking space for all military and privately-owned vehicles. A minimum width of 500 linear feet is required for any referred property to meet Anti-Terrorist Force Protection (ATFP) requirements.

2. The 2005 Defense Base Realignment and Closure (BRAC) Commission recommended closure of the United States Army Reserve Center in San Marcos, Texas, and relocation to a new Armed Forces Reserve Center in San Marcos, TX, if the Army is able to acquire land suitable for the construction of the facilities. The new AFRC shall have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate those National Guard units.

3. A Site Survey Team (SST) convened in San Marcos on 12 September 2007 to visit and evaluate the sites identified in the Available Site Identification and Validation report prepared by the Fort Worth Corps of Engineer District. A list of the SST participants is attached at enclosure 1 to the SSR. The ASIV was provided electronically to the 90th RSC as well as to IMA-AR and ACSIM-AR. The ASIV contains site data sheets for each site referred, topography maps, and photographs of each site as well as detailed location maps. Therefore the ASIV document is not included as an enclosure to this Site Survey Report. Recipients of this correspondence should download the electronic ASIV for San Marcos, Texas; attach this memorandum and the enclosed Site Survey Report to their copy of the ASIV as a cover sheet. The ASIV investigated six sites; Sites 1, 2, 3, and 4 were identified as non-Contending sites because the majority of the City of San Marcos is located in

AFRC-CAR-ENP

SUBJECT: Site Survey Report (SSR), San Marcos, Texas

a flood zone. Those sites were in fact in the flood zone area. The only sites that were not in the flood zone were sites 5 and 6. Site 6 was rejected because it is an L shaped parcel and would not meet force protection requirements. The SST originally identified Site 5, 2613 IH-35 South, San Marcos, Texas, as the Primary site to be pursued for acquisition. Before this Site Survey Report could be finalized, Ms. Jean Dillon, Fort Worth Corps of Engineers contacted this headquarters on 2 October 2007 to inform us Site 5 had been purchased by another party and it was no longer available to the Army Reserve. The loss of Site 5 invalidated the ASIV that was prepared in August 2007.

4. On 4 October 2007, the Fort Worth Corps of Engineers initiated a comprehensive search for additional sites to include in an amended ASIV. An additional site was identified on 16 October 2007 and has now been identified and validated as suitable to support the FY 09 BRAC funded MILCON project. The 90th RSC concurs with the Site Survey Team (SST) recommendations that Site Number 7, South side of Clovis Barker Road East of I-35, San Marcos, Texas 78666 be pursued as the Primary Site for acquisition. The real estate market in San Marcos is obviously volatile - time is of the essence in seeking approval to acquire Site 7 to preclude its loss.

5. After approval for acquisition is granted, request you inform the Louisville Corps of Engineers to pursue a purchase option immediately, prepare a Real Estate Planning Report (REPR) and Engineering Feasibility Study (EFS). Louisville Corps of Engineers should also pursue acquisition of the appropriate environmental documentation. Ms. Rachel White, (AC 501-771-8927), 90th Regional Readiness Command (RSC) established and chaired the Site Survey Team (SST). BRAC Planning and Design funds will be used to fund this project. Major Gregory Scott is the MILCON POC for this project (AC 703-601-1937).

FOR THE DCSARIM:



BILLY W. ROGERS
LTC, EN, USAR
90th RRC, Regional Engineer

Enclosures
as

CF: w/Encls
Installation Management Command, Army Reserve, ATTN: Mr.
Alfonzo Golden, 2511 Jefferson Davis Highway, Taylor Building
10th Floor, Arlington, VA 22202
Cdr, USACE, ATTN: CERE-AM (Ms. Mahoney)
Cdr, Fort Worth Corps of Engineer District, ATTN: CESWF-Real
Estate
Site Survey Team Members

San Marcos, TEXAS
SITE SURVEY REPORT
17 October 2007

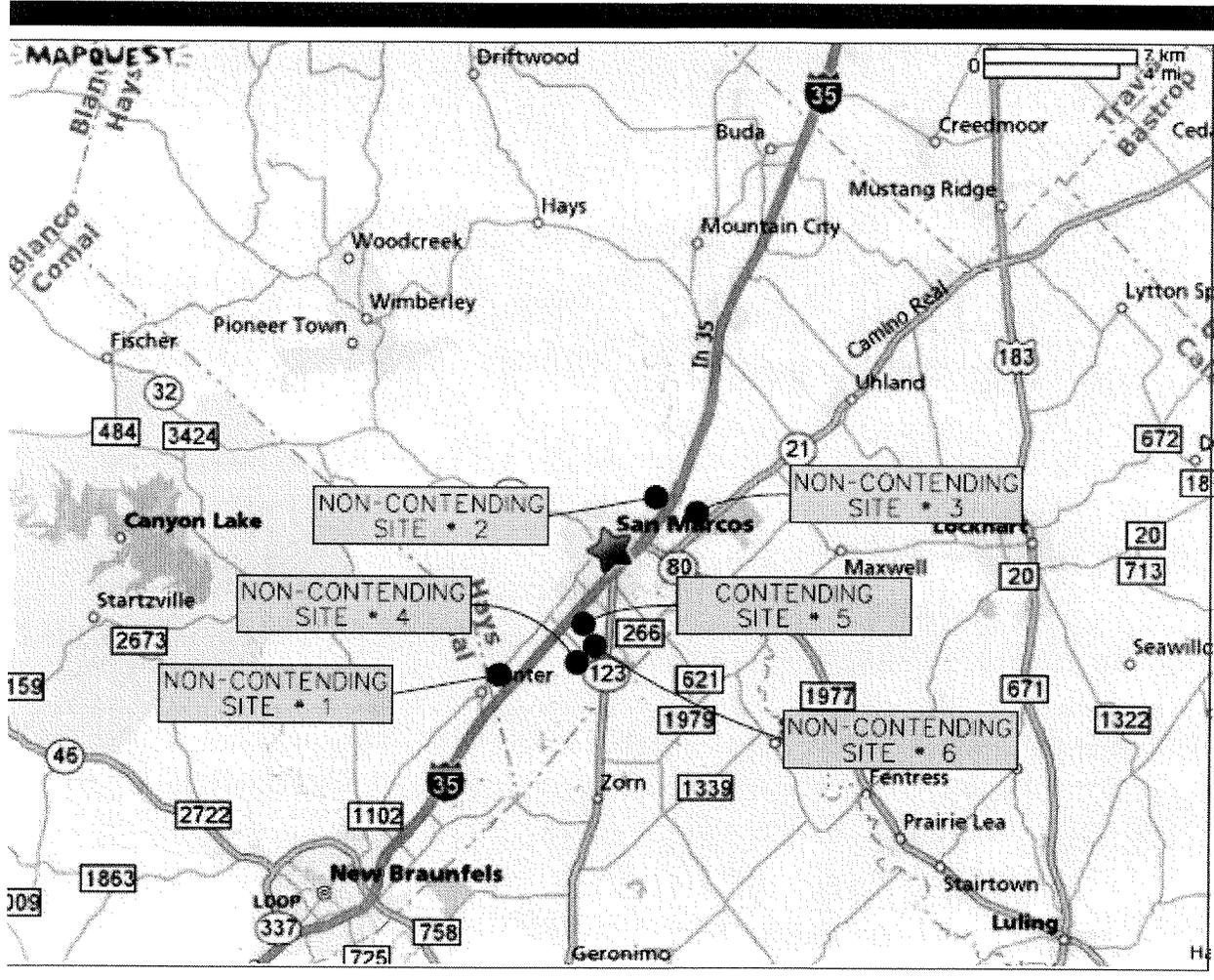
1. This site survey was originally conducted on 12 September 2007 to evaluate and select a suitable twelve (12) (+or-) acre site to support an FY 2009 BRAC Construction Army (BCA) project (Project Number 64469). A list of the Site Survey Team participants is attached as enclosure 1. This project will provide land and a 600 member Armed Forces Reserve Center training facility with Multi-use Classroom - Barracks, Organizational Maintenance Shop (OMS), and an unheated storage for the Army Reserve and the Army National Guard. The maintenance shop will provide work bays and maintenance administrative support. The project will also provide for unit storage and adequate parking space for all military and privately-owned vehicles. A minimum width of 500 linear feet is required for any referred property to meet Anti-Terrorist Force Protection (ATFP) requirements. Based on the center rating and in accordance with AR 140-483, Army Reserve Land and Facilities Management, a twelve (12) net useable acre site will be required for the AFRC project. A minimum width of 500 linear feet is required for any referred property to meet Anti-Terrorist Force Protection (ATFP) requirements.

2. The 2005 Defense Base Realignment and Closure (BRAC) Commission recommended closure of the United States Army Reserve Center in San Marcos, Texas, and relocation to a new Armed Forces Reserve Center in San Marcos, TX, if the Army is able to acquire land suitable for the construction of the facilities. The new AFRC shall have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate those National Guard units.

3. Ms. Rachel White presented a briefing to all team members prior to visiting the sites referred by the Fort Worth Corps of Engineer District. The ASIV investigated six sites; Sites 1, 2, 3, and 4 were located in a flood zone and were therefore identified as identified as non-Contending sites. The majority of the City of San Marcos is located in a flood zone. The only sites not in the flood zone were sites 5 and 6. Site 6 was rejected because it is an L shaped parcel and would not meet force protection requirements. The SST originally identified Site 5, 2613 IH-35 South, San Marcos, Texas, as the Primary site to be pursued for acquisition. Before this Site Survey Report could be finalized, Ms. Jean Dillon, Fort Worth Corps of Engineers contacted this headquarters on 2 October to inform us that

Site 5 was no longer available because it had been purchased by another party. On 4 October, the Fort Worth Corps of Engineers initiated a second search for additional sites to include in an amended ASIV. Two additional sites were identified; however one of the owner's agents later decided not to respond to the request for information and therefore was eliminated from consideration. A site was identified on 16 October and has now been identified and validated as suitable to support the FY 09 BRAC funded MILCON project. The 90th RSC concurs with the Site Survey Team (SST) recommendations that Site Number 7, South side of Clovis Barker Road East of I-35, San Marcos, Texas 78666 be pursued as the Primary Site for acquisition. The following comments provide a summary of observations captured by the SST.

San Marcos Texas



a. Site 7 The Site Survey Team unanimously identified Site 7 as the Primary Site to be pursued for acquisition. This site is approximately 19.13 acres and provides good access and visibility. The site is primarily flat and cleared which will cause very little site preparation. The site drains to the northwest into a drainage ditch that flows north to Clovis Barker Road. The current flood plan for this site is along the northwest border parallel to the drainage ditch due to excavation and development of the Gilmore Industrial Park. The site has excellent visibility from Interstate 35 and Clovis Barker Road which has four lanes with a center turning lane. Access to the site is via Interstate 34 and Highway 123. This site is located within five (5) miles of local restaurants and hotel/motel accommodations to support the drilling reservists. There are approximately three (3) acres within the site that are not build able. In addition, there is every indication there will be utility easements along the frontage of the property of at least twenty (20) foot width which further reduces the useable acreage. Because of the volatile real estate market in San Marcos and the lack of additional sites to be "found"; recommend the entire 19.13 acre site be acquired. The following additional information is provided:

ASIV Site 7: Address: South side of Clovis Barker Road East of I-35, San Marcos, Texas 78666

Congressional District: 25th

Senior Senator: John Cornyn

Junior Senator: Kay Bailey-Hutchison

Representative: Lloyd Doggett

Site Access: Via Clovis Barker Road

Owner/Authorized Representative Contact Information:

Tom Guilford, CCIM

President

Trophy Real Estate Corp.

102 Whitetail Dr., Suite 200

P.O. Box 274

San Marcos, Texas 78667

512 353-2102

FAX 512 392-3610

tgtrophy@aol.com

Size: Approximately 19.13 acres

Linear feet of site measurements:

Northeast: 726.39 ft.

Northwest: 1242.27 ft.

Southeast: 1147.16 ft.

Southwest: 972.67 ft.

There is 500 ft. of frontage along the road.

The site configuration is mostly rectangular with some curves along the northwest and southwest sides

Sub-dividing the property to acquire only twelve (12) acres could cause the owner to have an un-economic remainder with diminished value.

Environmental Concerns Present: None known

Flood Plan Data: FEMA Flood Zone C or X (Not in 100 year floodplain); however, there is approximately 3 acres (located on the West side of the property) of the total 19.13 acres that is located in the FEMA Flood Zone AE. Those three acres in the flood zone are now canalized.

Topography Aspects: primarily flat, cleared terrain

Utilities:

Linear feet to Public Water: 12" water line that runs along the front of property

Linear feet to Sewer: 6" sewer line is extended to the property; need to tie in

Linear feet to Electric: there are power lines, at most 50 yards away; plus the property is within the city limits so they will bring it in at no charge

Linear feet to Gas: unknown

Telephone: come in on electric line; probably fiber optic

Current Use: Vacant - unimproved

Buildings on Site: No

Relocation of Current Occupants Required: N/A

Demolition Required: N/A

Cut and fill Requirements: minor

Zoning: Heavy Industrial

Kim Moore, Economic Development Director, in the San Marcos Economic Development office has been very helpful and supportive in our effort to find a suitable site. Also, at the initial visit to San Marcos the Mayor, Susan Narvaiz, came to the Economic Development office to welcome us and show her support of our effort.

Fenced: No

Parking sufficient net useable land available: Yes

Distance to nearest Fire Station: approximate 4 miles away

Distance to nearest Fire Hydrant: located on the front of the property

Distance to nearest Police Station/Extended Territorial Jurisdiction (ETJ): 1.95 miles

Subject to Easements: Currently there are no known easements. **However, once the property has been platted there is a possibility that the city may require a road or utility easement along the front of the property. Ordinarily there would be an approximate 20 ft. easement where the front of the property and the road meet.**

Mineral Rights Reserved: unknown

Purchase Data:

Available Date: immediately

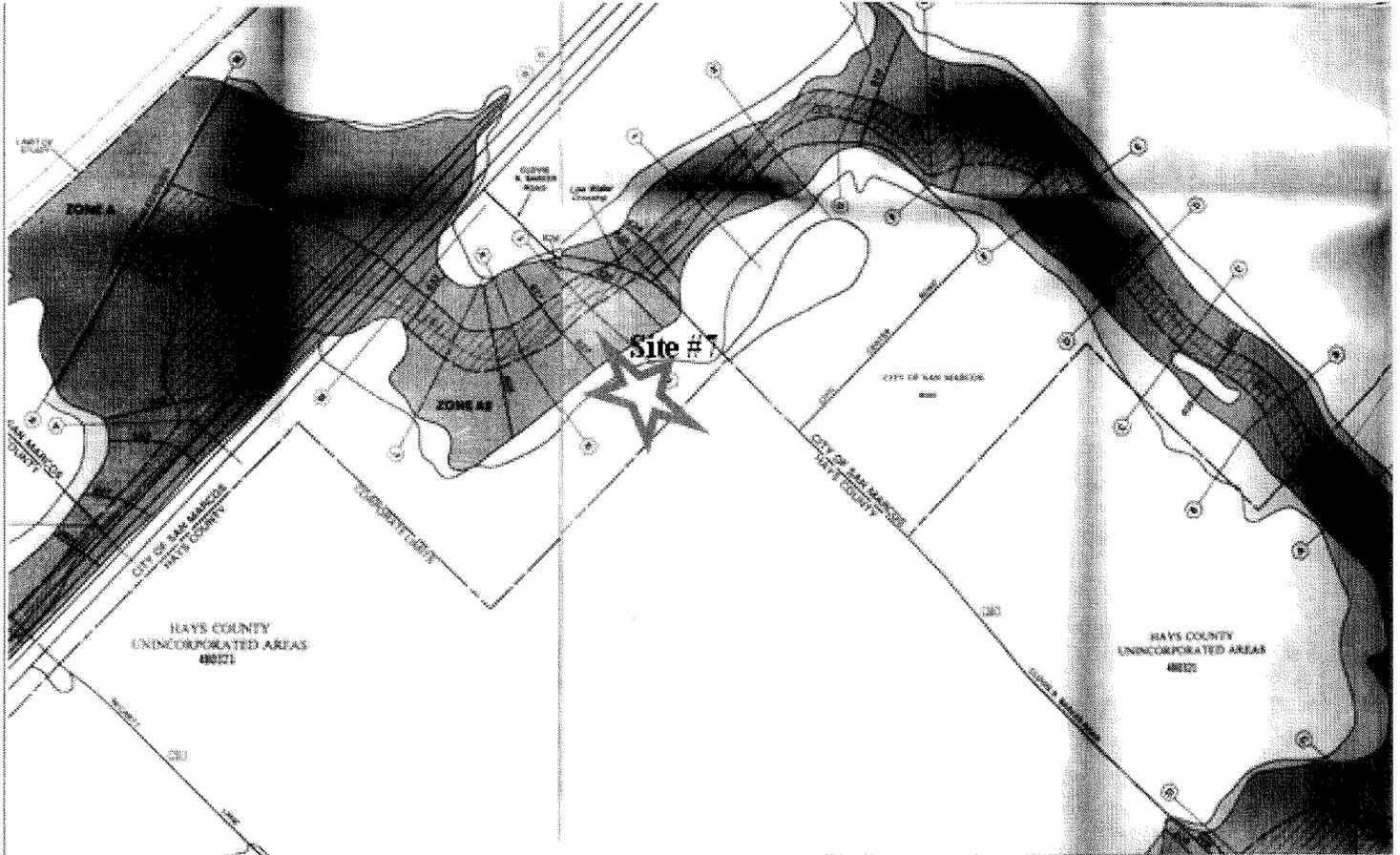
Asking Price: \$108,729.74 (per acre)

Total Asking Price for the 19.13 acres: \$2,080,000.00

Additional Comments: The property has not been platted and would need to be platted upon purchase. Currently this property is not on the market or "up for sale"; therefore, the owner is working with us because they know how the city is in support of our effort.

**Contending Site #7
FEMA Flood Plain Map**

South side of Clovis Barker Road East of I -35, San Marcos, Texas 78666



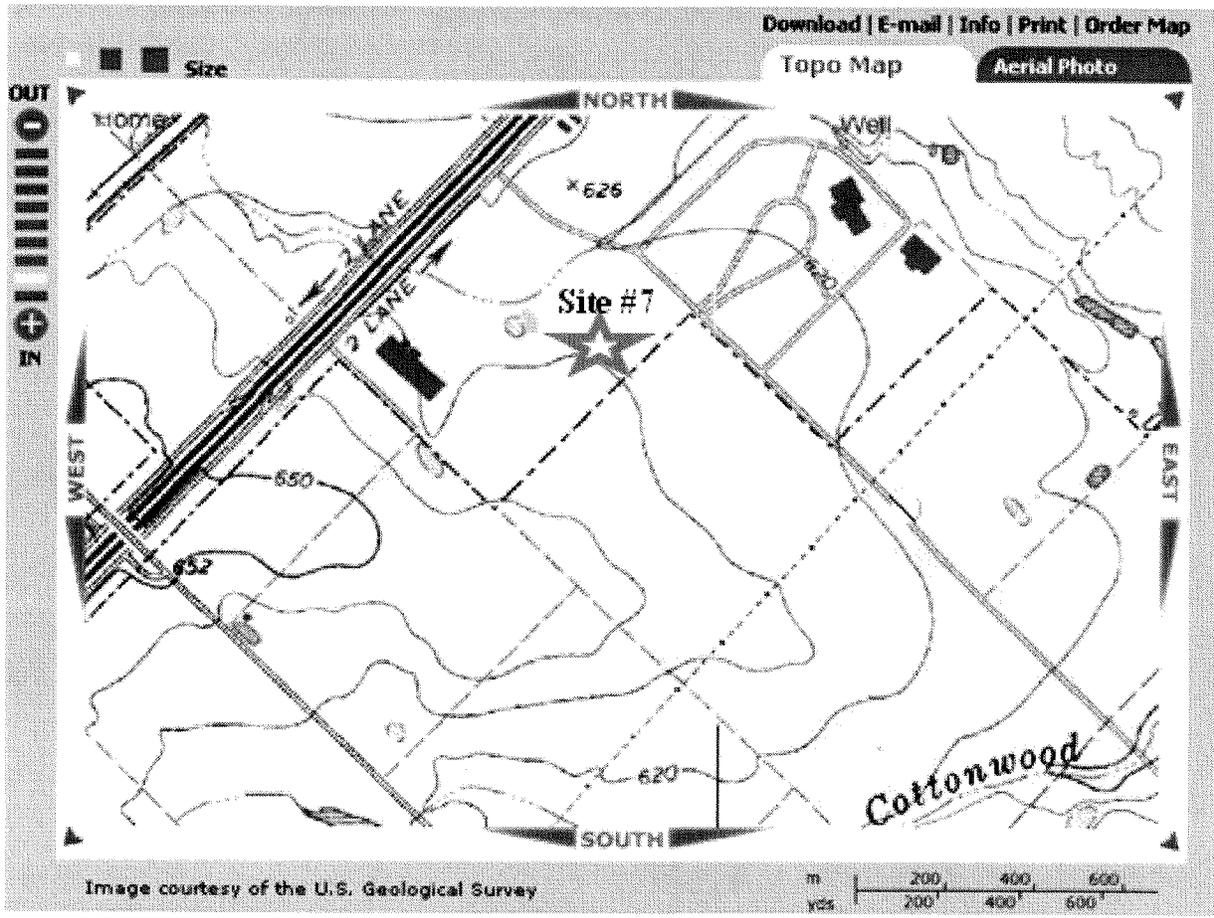
Contending Site #7 Aerial Map

South side of Clovis Barker Road East of I -35, San Marcos, Texas 78666



Contending Site #7 Topographical Map

South side of Clovis Barker Road East of I -35, San Marcos, Texas 78666



Contending Site #7

South side of Clovis Barker Road East of I -35, San Marcos, Texas 78666



View of the front of the property

Contending Site #7

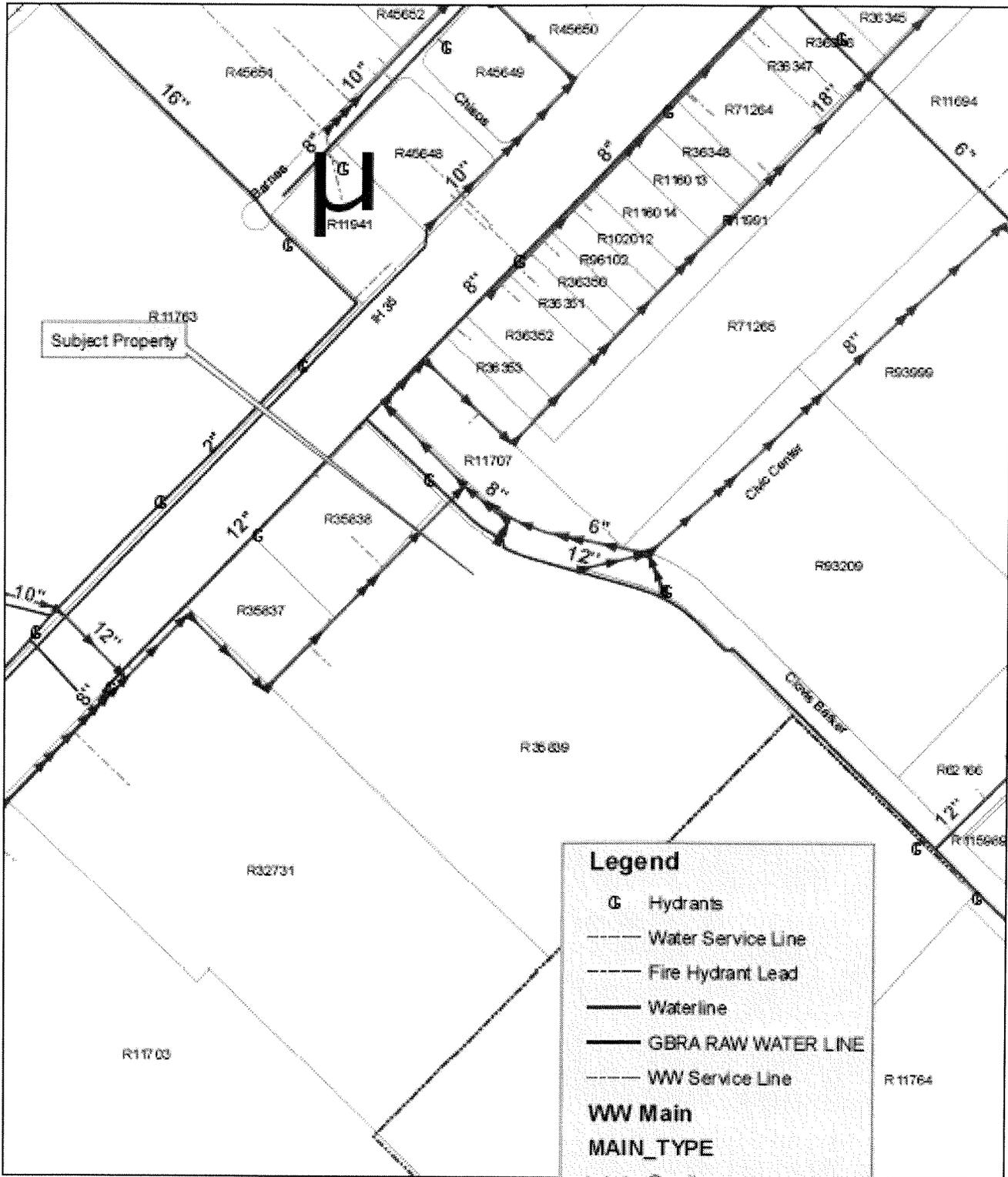
South side of Clovis Barker Road East of I -35, San Marcos, Texas 78666



View from the center of the property

Contending Site #7 Utility Map

South side of Clovis Barker Road East of I -35, San Marcos, Texas 78666



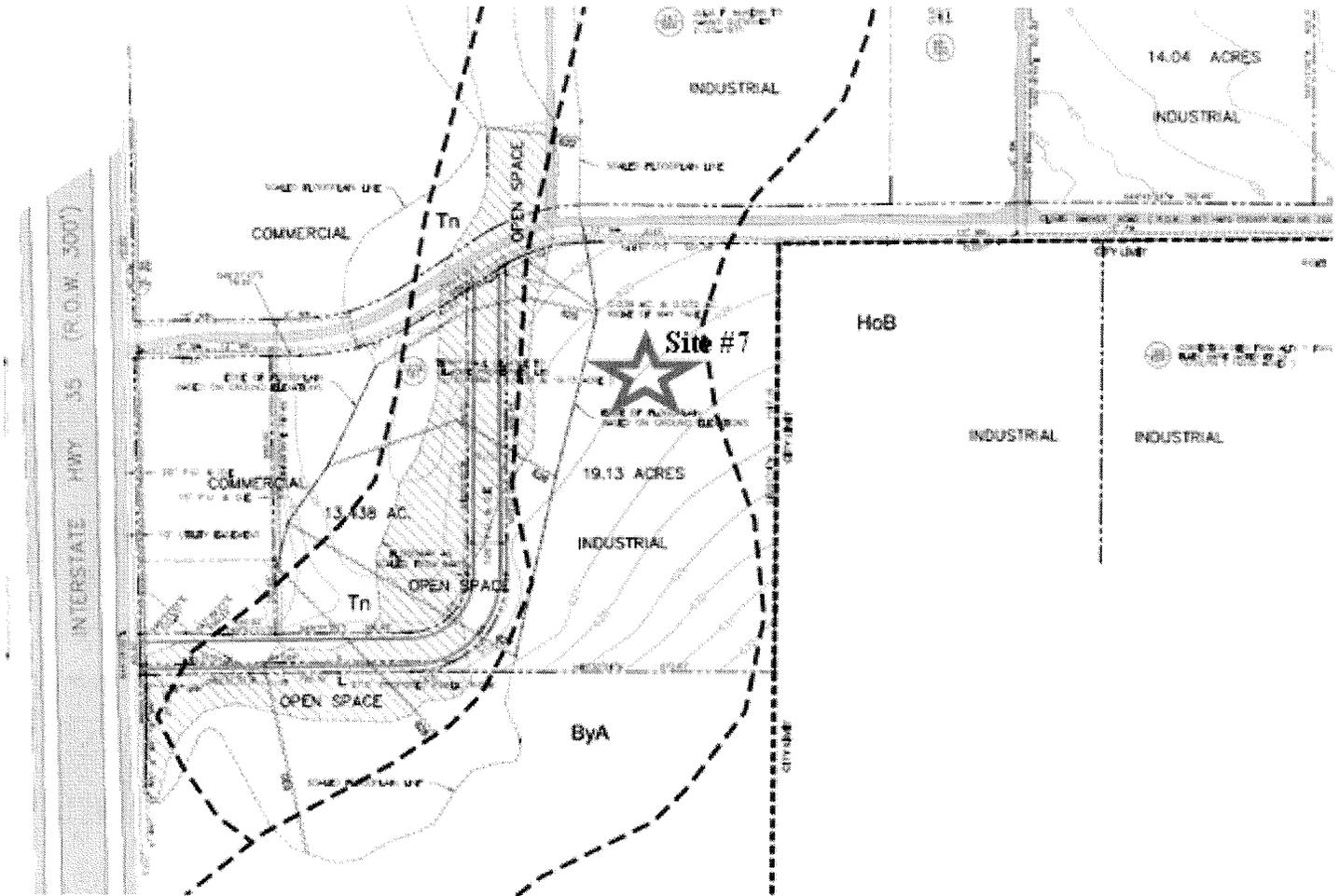
Legend

- G Hydrants
- Water Service Line
- - - Fire Hydrant Lead
- Waterline
- GBRA RAW WATER LINE
- WW Service Line
- WW Main**
- MAIN_TYPE**
- Gravity
- Force
- CityLimit2006_12

Contending Site #7

Map

South side of Clovis Barker Road East of I -35, San Marcos, Texas 78666



b. The ASIV investigated six sites; Sites 1, 2, 3, and 4 were identified as non-Contending sites because the majority of the City of San Marcos is located in a flood zone. Those sites were in fact in the flood zone area. The following information relates

to the non-contending sites that were contained in the ASIV. All were removed from the real estate market and no longer available for purchase.

(1) ASIV Site # 1 Data: Non-contending site
Address: H&H Industrial Park, 5680 IH-35 South, San Marcos, Texas
Congressional District: 25th
Senior Senator: John Cornyn
Junior Senator: Kay Bailey Hutchison
Representative: Patrick Rose
Site Access: Via 5680 IH-35 South
Owner/Authorized Representative Contact Information:
Forshey Hoobler
Southwest Corporate Services
The Staubach Company
15601 Dallas Parkway, Suite 400
Addison, Texas 75001
Direct: (972) 361-5293
Mobile: (214) 718-5680
E-mail: forshey.hoobler@staubach.com
Site Description: Entire site approximately 82 Acres - Sub-dividable
Environmental Concerns Present: None
Flood Plan Data: FEMA Flood Zone 100 year flood zone
Utilities: Water, Power and Sewer
Current Use: Vacant
Buildings on Site: None
Relocation of Current occupants Required: N/A
Demolition Required: N/A
Cut and fill Requirements: Minor
Zoning: Heavy & Light Industrial (HI& LI)
Fenced: No
Parking sufficient net useable land available: Sufficient parking available
Distance to nearest Fire Station: 6.6 Miles
Distance to nearest Fire Hydrant: Located on the property
Distance to nearest Police Station/Ext Territorial Jurisdiction (ETJ): 3.8 Miles
Subject to Easements: There are some roads and utility easements (Title Policy will be necessary)
Mineral Rights Reserved: Mineral Rights are owned by owner and will be included if site is purchased).
Purchase Data: Available Immediately
Asking Price: \$78,408 to \$130,680 (per acre)

(2) ASIV Site # 2 Data: Non-contending site

Address: River Ridge Business Park, IH-35 North, San Marcos, Texas

Congressional District: 25th

Senior Senator: John Cornyn

Junior Senator: Kay Bailey Hutchison

Representative: Patrick Rose

Site Access: Via IH-35 North

Owner/Authorized Representative Contact Information:

Forshey Hoobler

Southwest Corporate Services

The Staubach Company

15601 Dallas Parkway, Suite 400

Addison, Texas 75001

Direct: (972) 361-5293

Mobile: (214) 718-5680

E-mail: forshey.hoobler@staubach.com

Site Description: Entire site approximately 71 Acres - Sub-dividable

Environmental Concerns Present: None

Flood Plan Data: FEMA Flood Zone 100 year

Utilities: Water, Power and Sewer

Current Use: Vacant

Buildings on Site: None

Relocation of Current occupants Required: N/A

Demolition Required: N/A

Cut and fill Requirements: Minor

Zoning: Light Industrial and General Commercial

Fenced: No

Parking sufficient net useable land available: Sufficient parking available

Distance to nearest Fire Station: 6.6 Miles

Distance to nearest Fire Hydrant: Located across the street from the property

Distance to nearest Police Station/Extended Territorial Jurisdiction (ETJ): 3.8 Miles

Subject to Easements: There are some roads and utility easements (Title Policy will be necessary)

Mineral Rights Reserved: Mineral Rights are owned by owner and will be included if site is purchased).

Purchase Data:

Available Date: Available Immediately Asking Price: \$87,120 to \$304,920 (per acre)

Additional Comments: Close to power plants

(3) ASIV Site # 3 Data Non-Contending Site

Address: Glover 52 Acre Tract, Highway 21, San Marcos, Texas

Congressional District: 25th

Senior Senator: John Cornyn

Junior Senator: Kay Bailey Hutchison

Representative: Patrick Rose

Site Access: Via Hwy 21

Owner/Authorized Representative Contact Information:

Forshey Hoobler

Southwest Corporate Services

The Staubach Company

15601 Dallas Parkway, Suite 400

Addison, Texas 75001

Direct: (972) 361-5293

Mobile: (214) 718-5680

E-mail: forshey.hoobler@staubach.com

Site Description: Entire site approximately 52 Acres - Sub-dividable

Environmental Concerns Present: None

Flood Plan Data: FEMA Flood Zone In 100 year Flood zone

Utilities: Water, Power and Sewer

Current Use: Vacant

Buildings on Site: None

Relocation of Current occupants Required: N/A

Demolition Required: N/A

Cut and fill Requirements: Minor

Zoning: Light Industrial (LI)

Fenced: No

Parking sufficient net useable land available: Sufficient parking available

Distance to nearest Fire Station: 4.2 Miles

Distance to nearest Fire Hydrant: Unknown

Distance to nearest Police Station/Extended Territorial Jurisdiction (ETJ): 4.4 Miles

Subject to Easements: There are some roads and utility easements (Title Policy will be necessary)

Mineral Rights Reserved: Mineral Rights are owned by owner and will be included if site is purchased).

Purchase Data:

Available Date: Available Immediately

Asking Price: TBD

Additional Comments: Across from the San Marcos Airport; next to Gary Job Corps

(4) ASIV Site # 4 Data: Non-Contending Site

Address: Jaster Tract, Clovis Barker Road, San Marcos, Texas

Congressional District: 25th

Senior Senator: John Cornyn

Junior Senator: Kay Bailey Hutchison

Representative: Patrick Rose

Site Access: Highway 21

Owner/Authorized Representative Contact Information:

Forshey Hoobler
Southwest Corporate Services
The Staubach Company
15601 Dallas Parkway, Suite 400
Addison, Texas 75001
Direct: (972) 361-5293
Mobile: (214) 718-5680
E-mail: forshey.hoobler@staubach.com
Site: Entire site approximately 88 Acres - will sub-divide
Environmental Concerns Present: None
Flood Plan Data: FEMA Flood Zone -100 year flood zone
Topography Aspects:
Utilities: Water, Power and Sewer
Current Use: Vacant
Buildings on Site: None
Relocation of Current occupants Required: N/A
Demolition Required: N/A
Cut and fill Requirements: Minor
Zoning: Heavy & Light (HI & LI)
Fenced: No
Parking sufficient net useable land available: Sufficient parking available
Distance to nearest Fire Station: 1.6 Miles
Distance to nearest Fire Hydrant: Located on the property
Distance to nearest Police station/Extended Territorial Jurisdiction (ETJ): 5.3 Miles
Subject to Easements: There are some roads and utility easements (Title Policy will be necessary)
Mineral Rights Reserved: Mineral Rights are owned by owner and will be included if site is purchased).
Purchase Data:
Available Date: Available Immediately Asking Price: \$43,500 (per acre)

(5) ASIV Site # 5 Data: PREVIOUSLY CONSIDERED A CONTENDING SITE BUT LATER SOLD AND REMOVED FROM THE MARKET

Address: 2613 IH35 South, San Marcos, Texas
Congressional District: 25th
Senior Senator: John Cornyn
Junior Senator: Kay Bailey Hutchison
Representative: Patrick Rose
Site Access: Via IH35 South

Owner/Authorized Representative Contact Information:
Forshey Hoobler
Southwest Corporate Services
The Staubach Company
15601 Dallas Parkway, Suite 400
Addison, Texas 75001

Direct: (972) 361-5293

Mobile: (214) 718-5680

E-mail: forshey.hoobler@staubach.com

Site Description: Entire site approximately 17 Acres

Environmental Concerns Present: None

Flood Plan Data: FEMA Flood Zone- A

Topography Aspects:

TOPO map attached

Utilities: Water, Power and Sewer

Current Use: Vacant

Buildings on Site: None

Relocation of Current occupants Required: N/A

Demolition Required: N/A

Cut and fill Requirements: Minor

Zoning: General Commercial

Fenced: No

Parking sufficient net useable land available: Sufficient parking available

Distance to nearest Fire Station: 4.9 Miles

Distance to nearest Fire Hydrant: Unknown

Distance to nearest Police Station/Extended Territorial Jurisdiction (ETJ): 2.3 Miles

Subject to Easements: There are some roads and utility easements (Title Policy will be necessary)

Mineral Rights Reserved: Mineral Rights are owned by owner and will be included if site is purchased).

Purchase Data:

Available Date: Available Immediately

Asking Price: \$87,127.60 (per acre)

(6) ASIV Site # 6 Data: Non-Contending Site

Address: IH-35 South/Clovis Barker, San Marcos, Texas

Congressional District: 25th

Senior Senator: John Cornyn

Junior Senator: Kay Bailey Hutchison

Representative: Patrick Rose

Site Access: Via IH-35 South and Clovis Barker

Owner/Authorized Representative Contact Information:

Forshey Hoobler

Southwest Corporate Services

The Staubach Company

15601 Dallas Parkway, Suite 400

Addison, Texas 75001

Direct: (972) 361-5293

Mobile: (214) 718-5680

E-mail: forshey.hoobler@staubach.com

Site Description: Entire site is approximately 17+ acres

Environmental Concerns Present: None

Flood Plan Data: FEMA Flood Zone X

Utilities: Water, Power and Sewer

Current Use: Vacant

Buildings on Site: None

Relocation of Current occupants Required: N/A

Demolition Required: N/A

Cut and fill Requirements: Minor

Zoning: General Commercial (GC)

Fenced: No

Parking sufficient net useable land available: Sufficient parking available

Distance to nearest Fire Station: 4.9 Miles

Distance to nearest Fire Hydrant: Unknown

Distance to nearest Police Station/Ext Territorial Jurisdiction (ETJ): 6.4 Miles

Subject to Easements: There are some roads and utility easements (Title Policy will be necessary)

Mineral Rights Reserved: Mineral Rights are owned by owner and will be included if site is purchased).

Purchase Data:

Available Date: Available Immediately
(total)

Asking Price: \$1,550,000.00



Assistant Chief of Staff for Installation Management, Army Reserve
Installation Management Agency, Army Reserve
Available Site Identification and Validation (ASIV)
SITE SURVEY TEAM MEMBERS ATTENDANCE ROSTER



DATE: SEPT 12th 07

NAME	MAILING ADDRESS	DUTY POSITION	TELEPHONE NUMBERS	E-MAIL ADDRESS
Bill Benjamin	8000 Camp Robinson Rd North Little Rock, AR 72118	Real Property Specialist	W: (501) 771-7937 C: F:	William.benjamin2@us.army.mil
Joni Hubbard	600 Martin Luther King house on the way to 202	Project Manager	W: 5023156859 C: F:	JONI.L.HUBBARD@USACE.ARMY.MIL
Ron Hawcock	8000 CAMP ROBINSON RD N. LITTLE ROCK, AR 72118	BTC	W: 501-771-8788 C: F:	RON.HAWCOCK@USAR.ARMY.MIL
Michael Gaston	8000 CAMP ROBINSON RD N Little Rock, AR 72118	Plans officer	W: 501-771-8580 C: 210-724-6598 F:	MICHAEL.E.GASTON@USAR.ARMY.MIL
Roger Manauka	301 Alred Forests Dr Grand Prairie, TX 75251	BTC	W: 972-343-8045 C: F:	ROGER.MANAUKA@USAR.ARMY.MIL
Lassandra J. Miller	2511 Jefferson Davis Hwy Arlington, VA 22202	Realty Specialist	W: 703-662-1889 C: F:	lassandra.millere@usace.army.mil
Forest Willis	819 Taylor Street RW2895 Fort Worth, TX 76102	Realty Specialist	W: 817-886-1117 C: F:	forest.willis@usace.army.mil
David Borchardt	3848 Northwest Dr, Suite 100 College Park, GA	Environment	W: 078-8784094 x1328 C: 404-226-9220 F:	david.j.borchardt@us.army.mil
Jean P. Dillon	3628 Carriage Hill Fort Worth, TX 76140	Realty Specialist	W: 817-886-1210 C: F:	Jean.P.Dillon@usace.army.mil
RACHEL M WHITE	8000 CAMP ROBINSON RD NLR, AR 72118-2005	REAL ESTATE SPECIALIST	W: 501-771-8929 C: 501-971-3783 F: 501-771-7932	RACHEL.WHITE@USAR.ARMY.MIL

Instructions: Enter the date of the meeting and capture Site Survey Team Members' Work, Cell, and Fax telephone numbers for future contact purposes.

APPENDIX B
Air Emission Calculations

CALCULATION SHEET-COMBUSTABLE EMISSIONS-HAYS COUNTY

Assumptions for Combustable Emissions						
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs	
Water Truck	1	300	10	240	720000	
Diesel Road Compactors	1	100	10	90	90000	
Diesel Dump Truck	2	300	10	90	540000	
Diesel Excavator	1	300	10	16	48000	
Diesel Hole Trenchers	1	175	10	90	157500	
Diesel Bore/Drill Rigs	0	300	10	90	0	
Diesel Cement & Mortar Mixers	2	300	10	240	1440000	
Diesel Cranes	1	175	10	240	420000	
Diesel Graders	1	300	10	90	270000	
Diesel Tractors/Loaders/Backhoes	1	100	10	240	240000	
Diesel Bull Dozers	1	300	10	16	48000	
Diesel Front End Loaders	1	300	10	90	270000	
Diesel Fork Lifts	2	100	10	240	480000	
Diesel Generator Set	6	40	10	240	576000	

Emission Factors						
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr
Water Truck	0.440	2.070	5.490	0.410	0.400	0.740
Diesel Road Compactors	0.370	1.480	4.900	0.340	0.330	0.740
Diesel Dump Truck	0.440	2.070	5.490	0.410	0.400	0.740
Diesel Excavator	0.340	1.300	4.600	0.320	0.310	0.740
Diesel Trenchers	0.510	2.440	5.810	0.460	0.440	0.740
Diesel Bore/Drill Rigs	0.600	2.290	7.150	0.500	0.490	0.730
Diesel Cement & Mortar Mixers	0.610	2.320	7.280	0.480	0.470	0.730
Diesel Cranes	0.440	1.300	5.720	0.340	0.330	0.730
Diesel Graders	0.350	1.360	4.730	0.330	0.320	0.740
Diesel Tractors/Loaders/Backhoes	1.850	8.210	7.220	1.370	1.330	0.950
Diesel Bull Dozers	0.360	1.380	4.760	0.330	0.320	0.740
Diesel Front End Loaders	0.380	1.550	5.000	0.350	0.340	0.740
Diesel Fork Lifts	1.980	7.760	8.560	1.390	1.350	0.950
Diesel Generator Set	1.210	3.760	5.970	0.730	0.710	0.810

CALCULATION SHEET-COMBUSTABLE EMISSIONS-HAYS COUNTY

Emission factors (EF) were generated from the NONROAD2005 model for the 2006 calendar year. The VOC EFs includes exhaust and evaporative emissions. The VOC evaporative components included in the NONROAD2005 model are diurnal, hotsoak, running loss, tank permeation, hose permeation, displacement, and spillage. The construction equipment age distribution in the NONROAD2005 model is based on the population in U.S. for the 2006 calendar year.

Emission Calculations									
Type of Construction Equipment	VOC tons/yr	CO tons/yr	NOx tons/yr	PM-10 tons/yr	PM-2.5 tons/yr	SO2 tons/yr	CO2 tons/yr		
Water Truck	0.349	1.642	4.356	0.325	0.317	0.587	425.284		
Diesel Road Paver	0.037	0.147	0.486	0.034	0.033	0.073	53.180		
Diesel Dump Truck	0.262	1.232	3.267	0.244	0.238	0.440	318.963		
Diesel Excavator	0.018	0.069	0.243	0.017	0.016	0.039	28.368		
Diesel Hole Cleaners/Trenchers	0.089	0.423	1.008	0.080	0.076	0.128	92.996		
Diesel Bore/Drill Rigs	0.000	0.000	0.000	0.000	0.000	0.000	0.000		
Diesel Cement & Mortar Mixers	0.968	3.682	11.552	0.762	0.746	1.158	840.570		
Diesel Cranes	0.204	0.602	2.647	0.157	0.153	0.338	245.398		
Diesel Graders	0.104	0.405	1.407	0.098	0.095	0.220	159.571		
Diesel Tractors/Loaders/Backhoes	0.489	2.171	1.910	0.362	0.352	0.251	182.782		
Diesel Bull Dozers	0.019	0.073	0.252	0.017	0.017	0.039	28.368		
Diesel Front End Loaders	0.113	0.461	1.488	0.104	0.101	0.220	159.541		
Diesel Aerial Lifts	1.047	4.105	4.528	0.735	0.714	0.503	365.406		
Diesel Generator Set	0.768	2.387	3.789	0.463	0.451	0.514	372.790		
Total Emissions	4.467	17.398	36.934	3.400	3.309	4.512	3273.217		

Conversion factors	
Grams to tons	1.102E-06

CALCULATION SHEET AFRC WEEKEND TRAINING COMMUTE

Weekend Training AFRC Commute to New Site									
Pollutants	Emission Factors		Assumptions				Results by Pollutant		
	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of Cars	Number of trucks	Total Emissions cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	30	51	35	35	0.08	0.10	0.18
CO	12.4	15.7	30	51	35	35	0.73	0.93	1.66
NOx	0.95	1.22	30	51	35	35	0.06	0.07	0.13
PM-10	0.0052	0.0065	30	51	35	35	0.00	0.00	0.00
PM 2.5	0.0049	0.006	30	51	35	35	0.00	0.00	0.00

Truck Emission Factor Source: USEPA 2005 Emission Facts: Average annual emissions and fuel consumption for gasoline-fueled passenger cars and light trucks. EPA 420-F-05-022 August 2005. Emission rates were generated using MOBILE.6 highway vehicle emission factor model.

CALCULATION SHEET-TRANSPORTATION COMBUSTABLE EMISSIONS-HAYS COUNTY

Construction Worker Personal Vehicle Commuting to Construction Sight-Passenger and Light Duty Trucks									
Pollutants	Emission Factors			Assumptions				Results by Pollutant	
	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of cars	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	120	240	20	20	0.86	1.02	1.89
CO	12.4	15.7	120	240	20	20	7.87	9.97	17.84
NOx	0.95	1.22	120	240	20	20	0.60	0.77	1.38
PM-10	0.0052	0.0065	120	240	20	20	0.00	0.00	0.01
PM 2.5	0.0049	0.006	120	240	20	20	0.00	0.00	0.01

Heavy Duty Trucks Delivery Supply Trucks to Construction Sight									
Pollutants	Emission Factors			Assumptions				Results by Pollutant	
	10,000-19,500 lb Delivery Truck	33,000-60,000 lb semi trailer rig	Mile/day	Day/yr	Number of trucks	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	0.29	0.55	60	240	2	2	0.01	0.02	0.03
CO	1.32	3.21	60	240	2	2	0.04	0.10	0.14
NOx	4.97	12.6	60	240	2	2	0.16	0.40	0.56
PM-10	0.12	0.33	60	240	2	2	0.00	0.01	0.01
PM 2.5	0.13	0.36	60	240	2	2	0.00	0.01	0.02

Daily AFRC Commute to New Site									
Pollutants	Emission Factors			Assumptions				Results by Pollutant	
	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of Cars	Number of trucks	Total Emissions cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	30	240	6	6	0.06	0.08	0.14
CO	12.4	15.7	30	240	6	6	0.59	0.75	1.34
NOx	0.95	1.22	30	240	6	6	0.05	0.06	0.10
PM-10	0.0052	0.0065	30	240	6	6	0.00	0.00	0.00
PM 2.5	0.0049	0.006	30	240	6	6	0.00	0.00	0.00

Truck Emission Factor Source: USEPA 2005 Emission Facts: Average annual emissions and fuel consumption for gasoline-fueled passenger cars and light trucks. EPA 420-F-05-022 August 2005. Emission rates were generated using MOBILE.6 highway vehicle emission factor model.

CALCULATION SHEET-FUGITIVE DUST- HAYS COUNTY

Fugitive Dust Emissions at New Construction Site.					
Construction Site	Emission Factor tons/acre/month (1)	Total Area- Construction/mont h	Months/yr	Total PM-10 Emissions tns/yr	Total PM-2.5 (2)
Fugitive Dust Emissions	0.11	12.00	12	15.84	3.17

1. Environmental Protection Agency (EPA) 2001. Procedures Document for National Emission Inventory, Criteria Air Pollutants 1985-1999. EPA-454/R-01-006. Office of Air Quality Planning and Standards Research Triangle Park NC 27711.

2. 20% of the total PM-10 emissions are PM-2.5 (EPA 2001).

Coconstruction Site Area	Length	Demension (ft)		Total Acres/month
		Width	Units	
Proposed Prioject Construction Area	0	0	1	12.00
Total				12.00

Conversion Factors	Miles to Ft	Sq ft to Acres	Acres to sq ft	Sq ft in 0.5 acres
	5280	0.000022957	43560	21780

CALCULATION SHEET-SUMMARY OF EMISSIONS-HAYS COUNTY

Proposed Action Construction Emissions for Criteria Pollutants (tons per year)							
Emission source	VOC	CO	NOX	PM-10	PM-2.5	SO ₂	
Combustible Emissions	4.47	17.40	36.93	3.40	3.31	4.51	
Construction Site-fugitive PM-10	NA	NA	NA	15.84	3.17	NA	
Construction Workers Commuter & Trucking	1.91	17.98	1.94	0.02	0.02	NA	
Total emissions	6.38	35.38	38.87	19.26	6.50	4.51	
De minimis threshold	NA	NA	NA	NA	NA	NA	
AFRC Personnel Commute to Work	0.32	3.00	0.23	0.00	0.00	NA	

APPENDIX C
Correspondence





August 22, 2008

District Conservationist
NRCS, San Marcos Service Center
501 Broadway Street
San Marcos, TX 78666-7748

Re: Farmland Conversion Impact Assessment for the new Armed Forces Reserve Center in San Marcos, Texas

Dear Sir:

On behalf of the U. S. Army Corps of Engineers, Mobile District, who is acting for the Government to prepare the environmental assessment of a Base Closure and Realignment (BRAC) action requiring relocation of Army and state reserve forces to a new Armed Forces Reserve Center in San Marcos, Texas; we are forwarding to you for your evaluation a Farmland Conversion Impact Rating on form AD-1006. We have determined that the soils on the preferred site, as shown in the attached figures, are rated as prime farmland, subject to the Farmland Protection Policy Act of 1981.

Please review and assess the attached information, and advise if additional information or clarification is required. Please return all correspondence to my attention at the address on this letterhead. I can also be reached at the following email address: soivanki@gsrcorp.com. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Oivanki", is written over a white background.

Stephen Oivanki
GSRC

attachments

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)	Date Of Land Evaluation Request 8/22/08
---	---

Name Of Project San Marcos AFRC, Texas	Federal Agency Involved Department of the Army
--	--

Proposed Land Use New Armed Forces Reserve Center	County And State Hays Co., Texas
---	----------------------------------

PART II (To be completed by NRCS)	Date Request Received By NRCS
--	-------------------------------

Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply -- do not complete additional parts of this form).	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Acres Irrigated	Average Farm Size
---	------------------------------	-----------------------------	-----------------	-------------------

Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %	Amount Of Farmland As Defined in FPPA Acres: %
---------------	---	---

Name Of Land Evaluation System Used	Name Of Local Site Assessment System	Date Land Evaluation Returned By NRCS
-------------------------------------	--------------------------------------	---------------------------------------

PART III (To be completed by Federal Agency)	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	12.0			
B. Total Acres To Be Converted Indirectly	7.0			
C. Total Acres In Site	19.0	0.0	0.0	0.0

PART IV (To be completed by NRCS) Land Evaluation Information				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value				

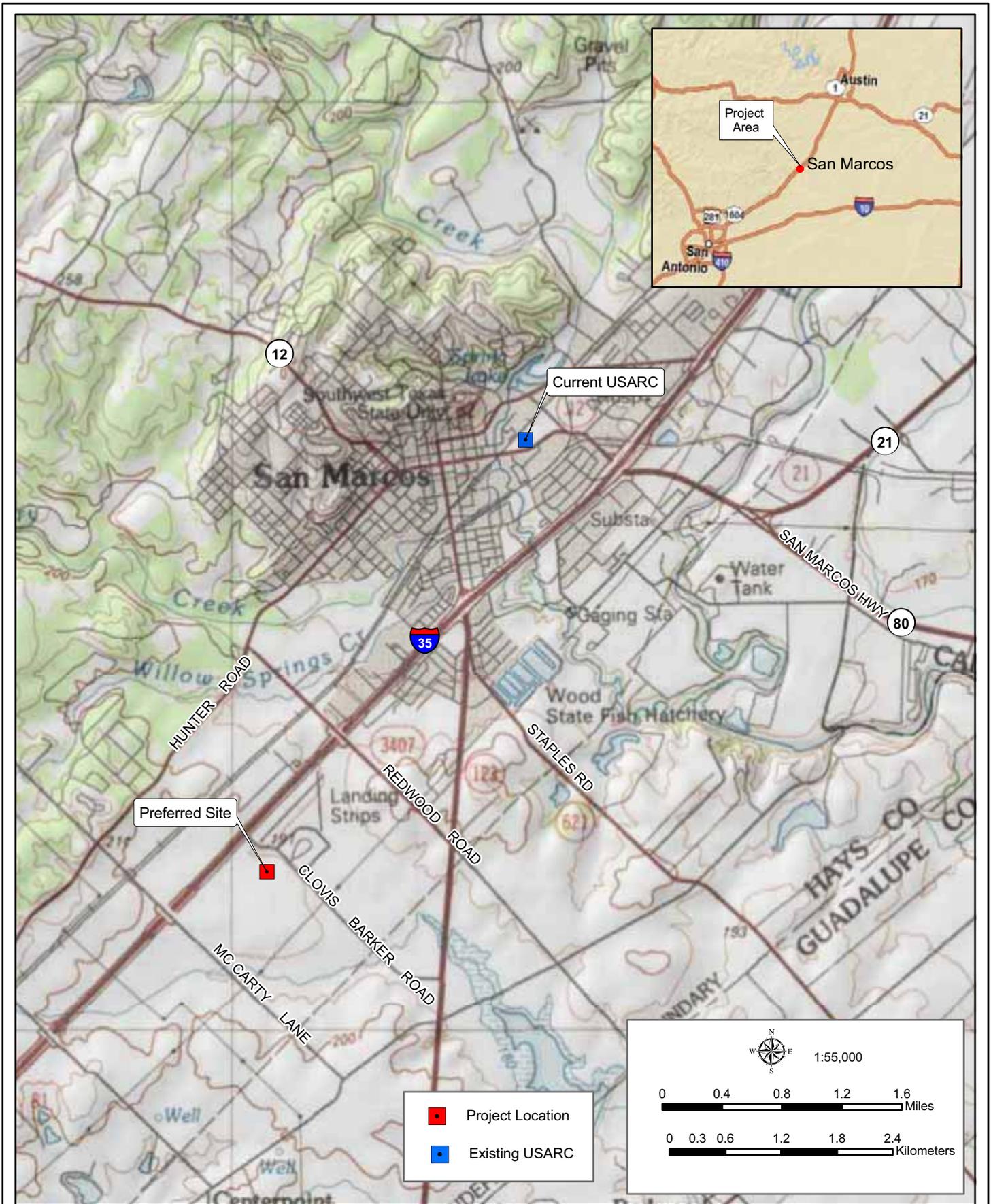
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)	0	0	0	0
--	---	---	---	---

PART VI (To be completed by Federal Agency) Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))	Maximum Points				
1. Area In Nonurban Use					
2. Perimeter In Nonurban Use					
3. Percent Of Site Being Farmed					
4. Protection Provided By State And Local Government					
5. Distance From Urban Builtup Area					
6. Distance To Urban Support Services					
7. Size Of Present Farm Unit Compared To Average					
8. Creation Of Nonfarmable Farmland					
9. Availability Of Farm Support Services					
10. On-Farm Investments					
11. Effects Of Conversion On Farm Support Services					
12. Compatibility With Existing Agricultural Use					
TOTAL SITE ASSESSMENT POINTS	160	0	0	0	0

PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)	100	0	0	0	0
Total Site Assessment (From Part VI above or a local site assessment)	160	0	0	0	0
TOTAL POINTS (Total of above 2 lines)	260	0	0	0	0

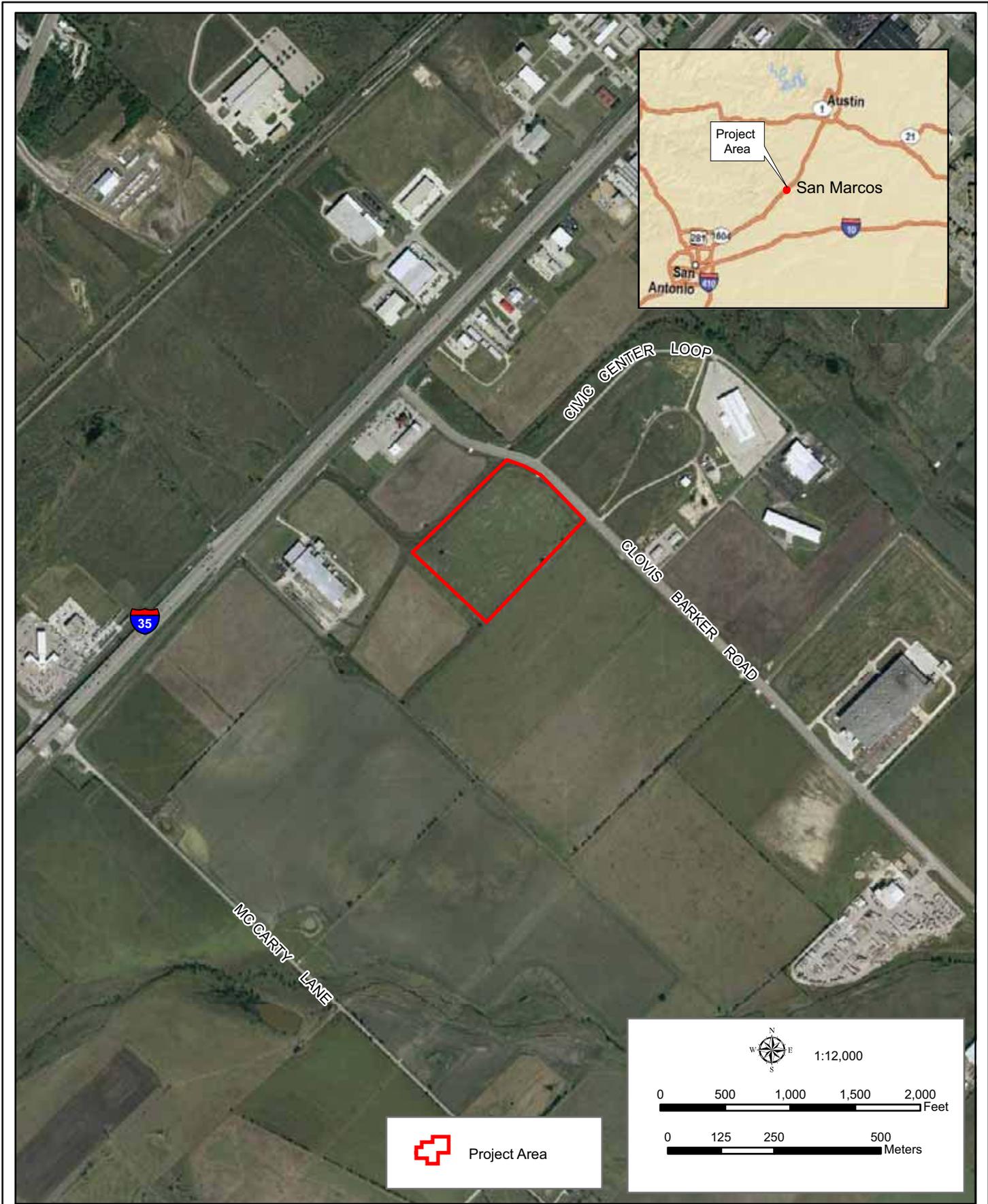
Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input type="checkbox"/>
----------------	-------------------	---

Reason For Selection:



Enclosure A: Vicinity Map

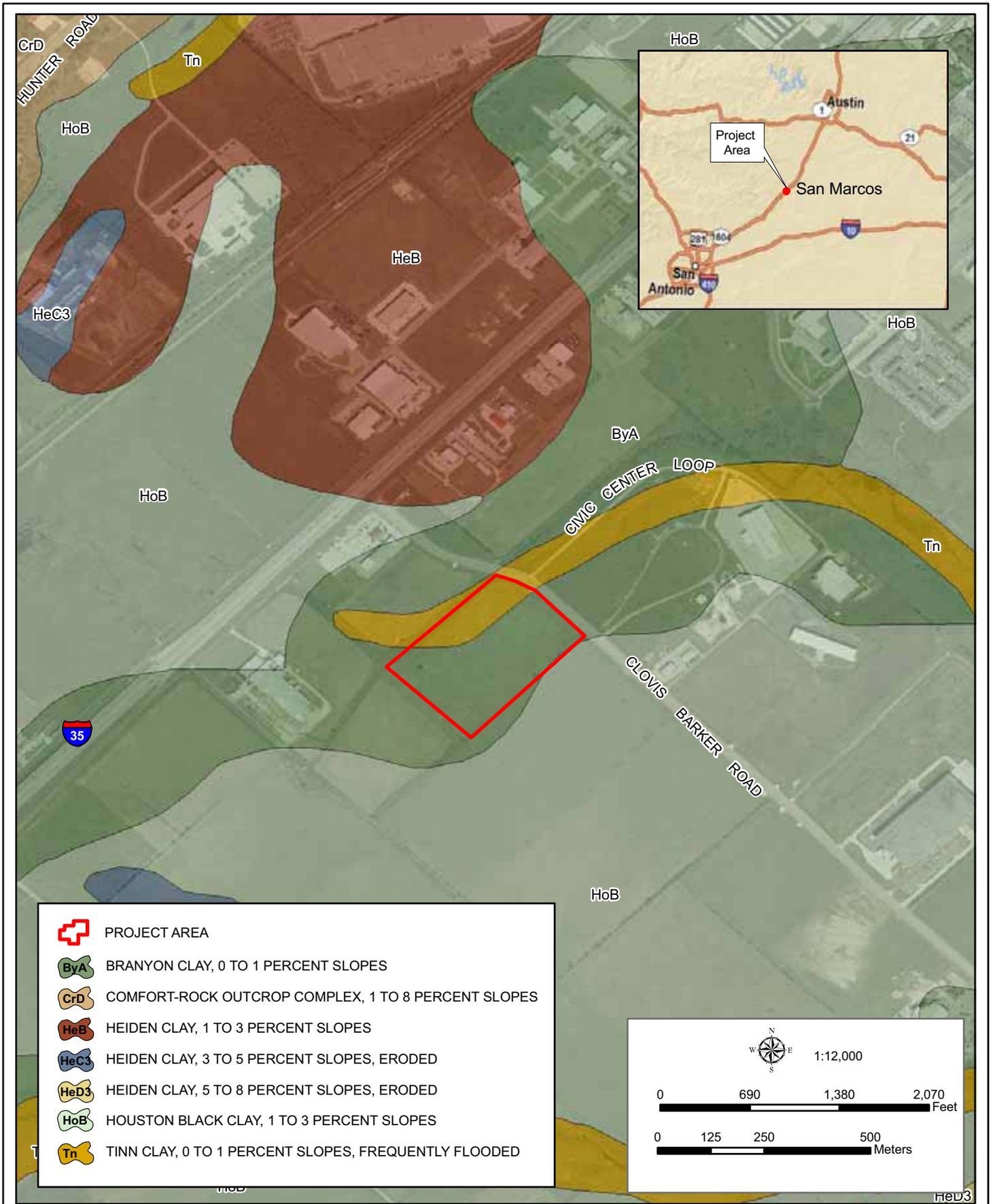




Enclosure B: Project Site Map - Preferred Site



August 2008



Enclosure C: Project Site Soils Map



August 2008

United States Department of Agriculture



Natural Resources Conservation Service

101 S. Main Street
Temple, TX 76501-6624
Phone: 254-742-9861
FAX: 254-742-9859

October 22, 2008

Gulf South Research Corporation
8081 GSRI Avenue
Baton Rouge, Louisiana 70820
Attention: Stephen Oivanki

Subject: LNU-Farmland Protection
New Armed Forces Reserve Center, San Marcos
Hays County, Texas

We have reviewed the information provided concerning the proposed Armed Forces Reserve Center in San Marcos, Hays County, Texas, as outlined in your letter of August 22, 2008. This review is part of the National Environmental Policy Act (NEPA) evaluation for the Department of the Army. We have evaluated the proposed Project as required by the Farmland Protection Policy Act (FPPA).

This project would be exempt from the FPPA because the acquisition or use of farmland by a Federal agency for national defense purposes is exempted by section 1547(b) of the FPPA, 7 U.S.C. 4208(b). We have completed the AD-1006 (Farmland Conversion Impact Rating form) you provided us that shows the site is not classified as Important Farmland. It is attached.

Thank you for the resource materials you submitted to evaluate this project. If you have any questions please call Laurie Kiniry at (254)-742-9861, Fax (254)-742-9859.

Sincerely,

A handwritten signature in cursive script that reads "Laurie Kiniry".

Laurie N. Kiniry, Soil Scientist

Enclosure

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency) Date Of Land Evaluation Request **8/22/08**

Name Of Project **San Marcos AFRC, Texas** Federal Agency Involved **Department of the Army**

Proposed Land Use **New Armed Forces Reserve Center** County And State **Hays Co., Texas**

PART II (To be completed by NRCS) Date Request Received By NRCS

Does the site contain prime, unique, statewide or local important farmland?
(If no, the FPPA does not apply -- do not complete additional parts of this form). Yes No Acres Irrigated Average Farm Size

Major Crop(s) Farmable Land In Govt. Jurisdiction Acres: % Amount Of Farmland As Defined in FPPA Acres: %

Name Of Land Evaluation System Used Name Of Local Site Assessment System Date Land Evaluation Returned By NRCS

PART III (To be completed by Federal Agency)

	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	12.0			
B. Total Acres To Be Converted Indirectly	7.0			
C. Total Acres In Site	19.0	0.0	0.0	0.0

PART IV (To be completed by NRCS) Land Evaluation Information

A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value				

PART V (To be completed by NRCS) Land Evaluation Criterion
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)

	0	0	0	0
--	---	---	---	---

PART VI (To be completed by Federal Agency)
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))

Site Assessment Criteria	Maximum Points				
1. Area In Nonurban Use					
2. Perimeter In Nonurban Use					
3. Percent Of Site Being Farmed					
4. Protection Provided By State And Local Government					
5. Distance From Urban Builtup Area					
6. Distance To Urban Support Services					
7. Size Of Present Farm Unit Compared To Average					
8. Creation Of Nonfarmable Farmland					
9. Availability Of Farm Support Services					
10. On-Farm Investments					
11. Effects Of Conversion On Farm Support Services					
12. Compatibility With Existing Agricultural Use					
TOTAL SITE ASSESSMENT POINTS	160	0	0	0	0

PART VII (To be completed by Federal Agency)

Relative Value Of Farmland (From Part V)	100	0	0	0	0
Total Site Assessment (From Part VI above or a local site assessment)	160	0	0	0	0
TOTAL POINTS (Total of above 2 lines)	260	0	0	0	0

Site Selected: _____ Date Of Selection _____ Was A Local Site Assessment Used? Yes No

Reason For Selection: _____



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 19, 2008

Environmental Office

Mr. Billy E. Horse
Kiowa Tribe of Oklahoma
Business Committee
P.O. Box 369
Carnegie, OK 73015

Dear Chairperson Horse:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate these National Guard units. Although the preferred site encompasses approximately 19 acres, the total amount of disturbed area is expected to be approximately 12 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

Only one location, the proposed site at San Marcos, Texas, was identified as suitable for the construction of the AFRC (see Enclosure A). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location.

After a thorough search of the archaeological, historic building, and burial indices at the Texas State Historic Preservation Office, we have determined that there are no recorded archaeological sites, no recorded historic structures, and no recorded human burials on the property as described above. If your Tribe, or members of your Tribe, have knowledge of traditional cultural properties, sacred sites, or burials on or near the sites of our project, we request that you notify our representative listed below.

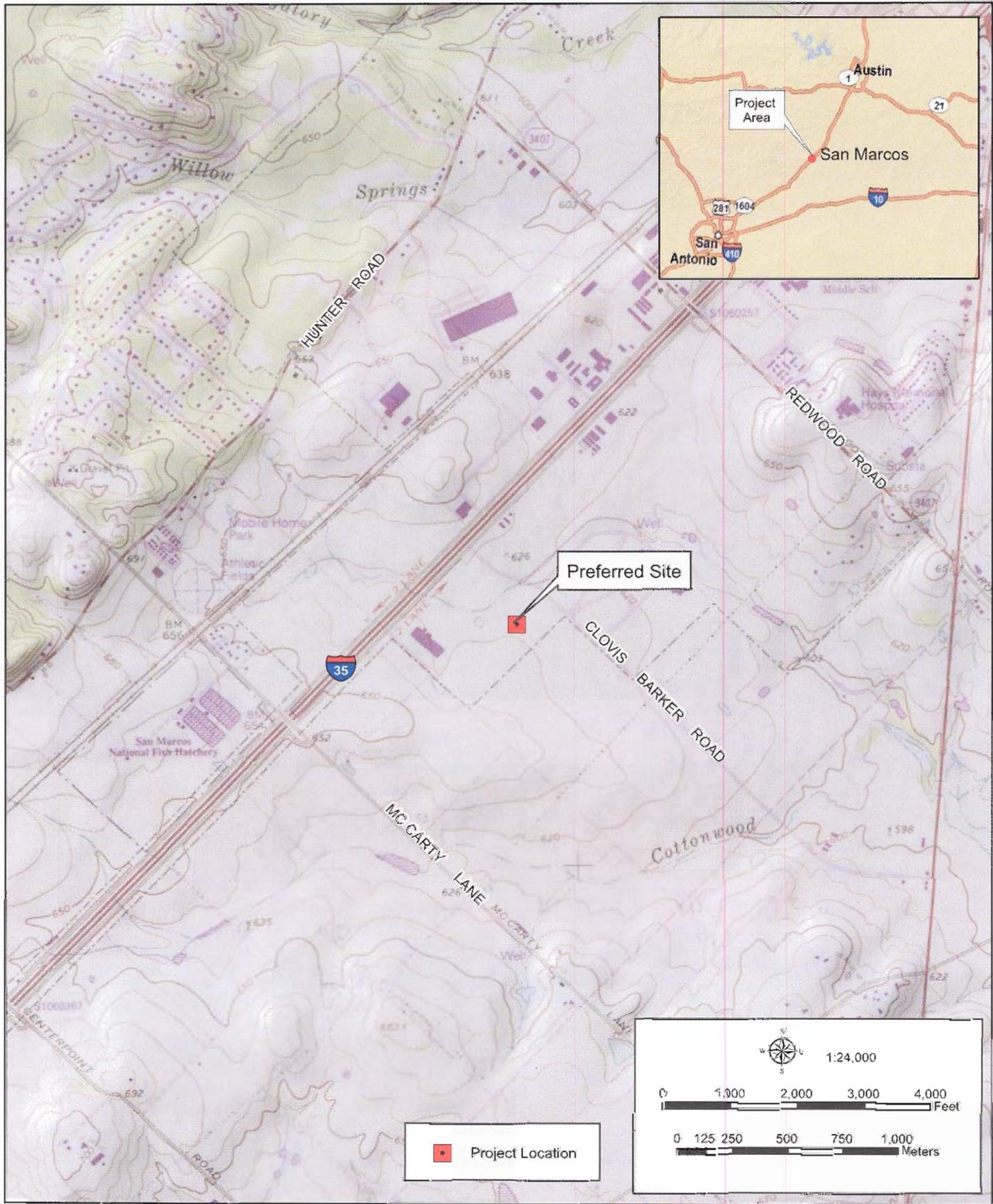
This notification is an invitation for your Tribe to participate in the cultural resources consultation process as required by the National Historic Preservation Act of 1966 (NHPA), as amended, and Presidential Executive Order 13175 Consultation and Coordination with Indian Tribal Governments. The Army wishes to ensure that issues of concern to your Tribe are addressed, and welcomes any comments you may have about the proposed AFRC construction. If you have questions or concerns about this project, please contact Mr. James Wheeler II, Environmental Manager, 90th Regional Readiness Command at (501) 771-7992, within thirty days of receipt of this letter.

Sincerely,



Philip L. Hanrahan
Brigadier General, U.S. Army Reserve
Commanding

Enclosure



Enclosure A. Vicinity Map



August 2008



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 19, 2008

Environmental Office

The Honorable Wallace Coffey, Chairman
Comanche Nation
ATTN: Office of Historic Preservation (Arterberry)
P.O. Box 908
Lawton, OK 73502

Dear Chairman Coffey:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate these National Guard units. Although the preferred site encompasses approximately 19 acres, the total amount of disturbed area is expected to be approximately 12 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

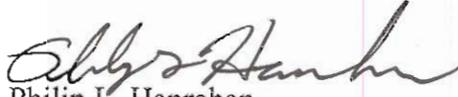
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After a thorough search of the archaeological, historic building, and burial indices at the Texas State Historic Preservation Office, we have determined that there are no recorded archaeological sites, no recorded historic structures, and no recorded human burials on the property as described above. If your Tribe, or members of your Tribe, have knowledge of traditional cultural properties, sacred sites, or burials on or near the sites of our project, we request that you notify our representative listed below.

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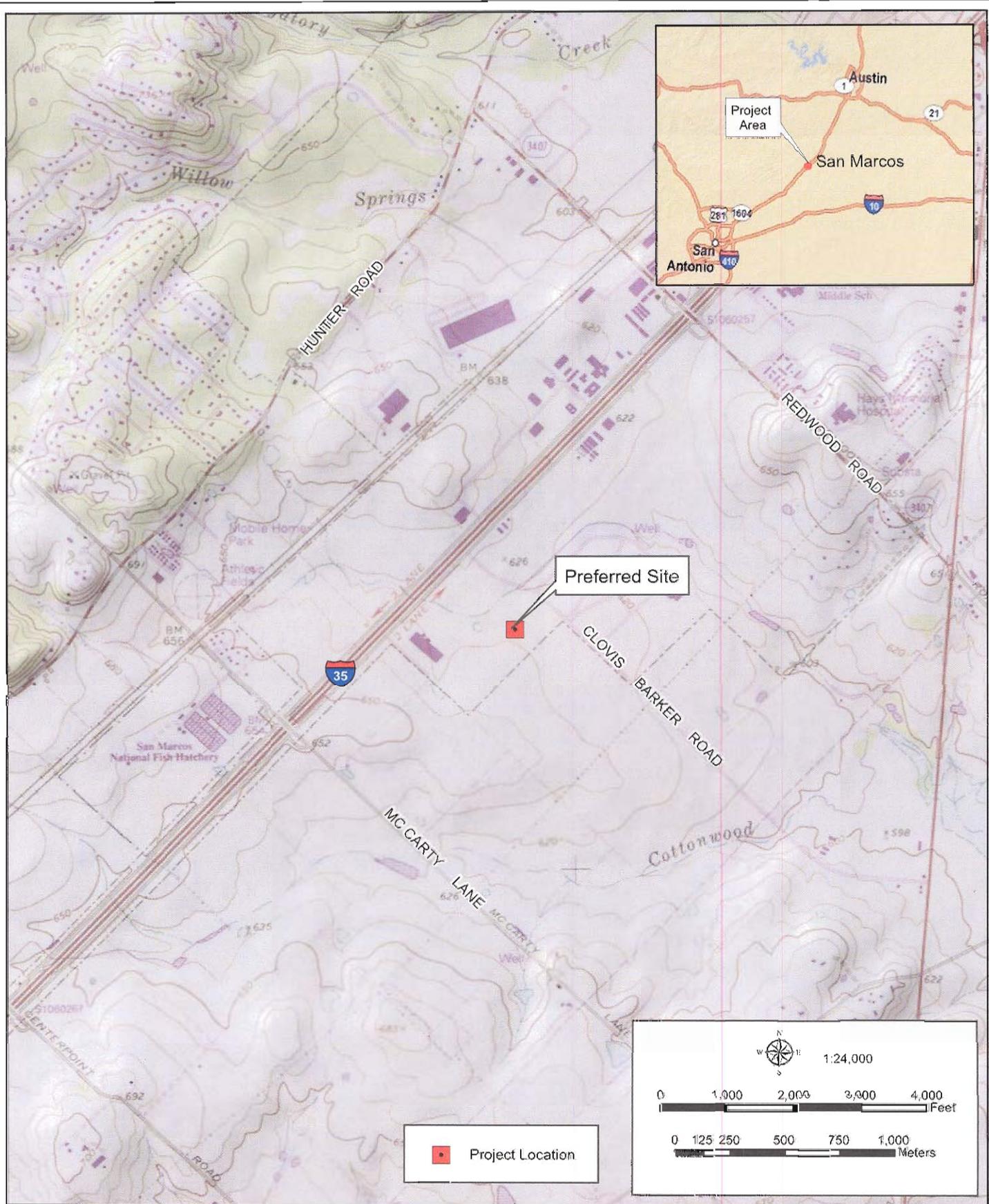
amended, and Presidential Executive Order 13175 Consultation and Coordination with Indian Tribal Governments. The Army wishes to ensure that issues of concern to your Tribe are addressed, and welcomes any comments you may have about the proposed AFRC construction. If you have questions or concerns about this project, please contact Mr. James Wheeler II, Environmental Manager, 90th Regional Readiness Command at (501) 771-7992, within thirty days of receipt of this letter.

Sincerely,



Philip L. Hanrahan
Brigadier General, U.S. Army Reserve
Commanding

Enclosure



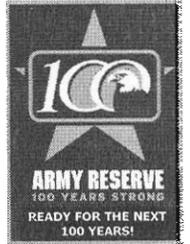
Enclosure A. Vicinity Map



August 2008



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 19, 2008

Environmental Office

Mr. Nathan Tselee
Apache Tribe of Oklahoma
Business Committee
P.O. Box 1220
Anadarko, OK 73005

Dear Chairman Tselee:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate these National Guard units. Although the preferred site encompasses approximately 19 acres, the total amount of disturbed area is expected to be approximately 12 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

Only one location, the proposed site at San Marcos, Texas, was identified as suitable for the construction of the AFRC (see Enclosure A). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location.

After a thorough search of the archaeological, historic building, and burial indices at the Texas State Historic Preservation Office, we have determined that there are no recorded archaeological sites, no recorded historic structures, and no recorded human burials on the property as described above. If your Tribe, or members of your Tribe, have knowledge of traditional cultural properties, sacred sites, or burials on or near the sites of our project, we request that you notify our representative listed below.

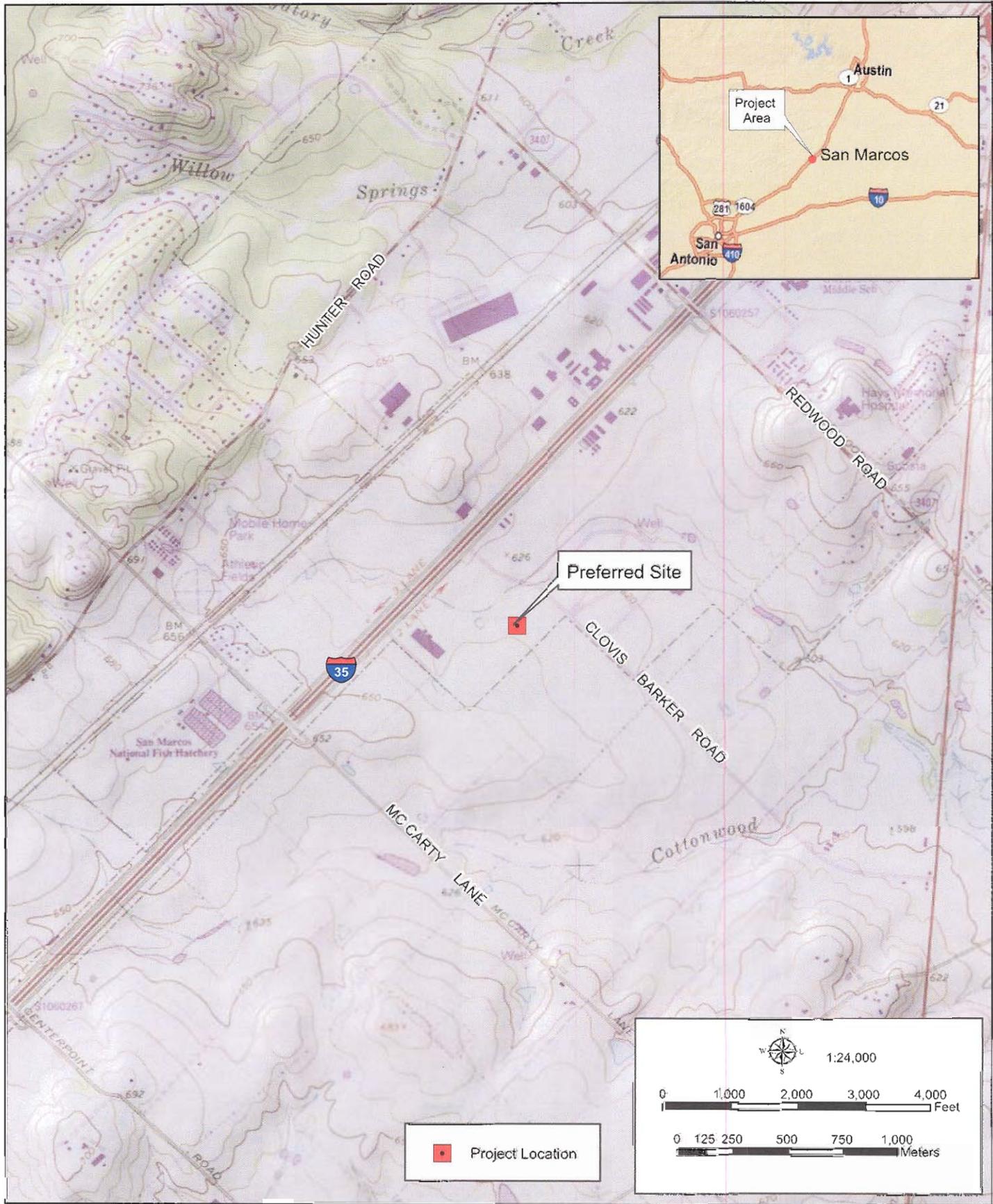
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Sincerely,



Philip L. Hanrahan
Brigadier General, U.S. Army Reserve
Commanding

Enclosure



Enclosure A. Vicinity Map



August 2008



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HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
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NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 19, 2008

Environmental Office

Mr. Mark R. Chino
Mescalero Apache Tribe
P.O. Box 227
Mescalero, NM 88340

Dear President Chino:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate these National Guard units. Although the preferred site encompasses approximately 19 acres, the total amount of disturbed area is expected to be approximately 12 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

Only one location, the proposed site at San Marcos, Texas, was identified as suitable for the construction of the AFRC (see Enclosure A). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location.

After a thorough search of the archaeological, historic building, and burial indices at the Texas State Historic Preservation Office, we have determined that there are no recorded archaeological sites, no recorded historic structures, and no recorded human burials on the property as described above. If your Tribe, or members of your Tribe, have knowledge of traditional cultural properties, sacred sites, or burials on or near the sites of our project, we request that you notify our representative listed below.

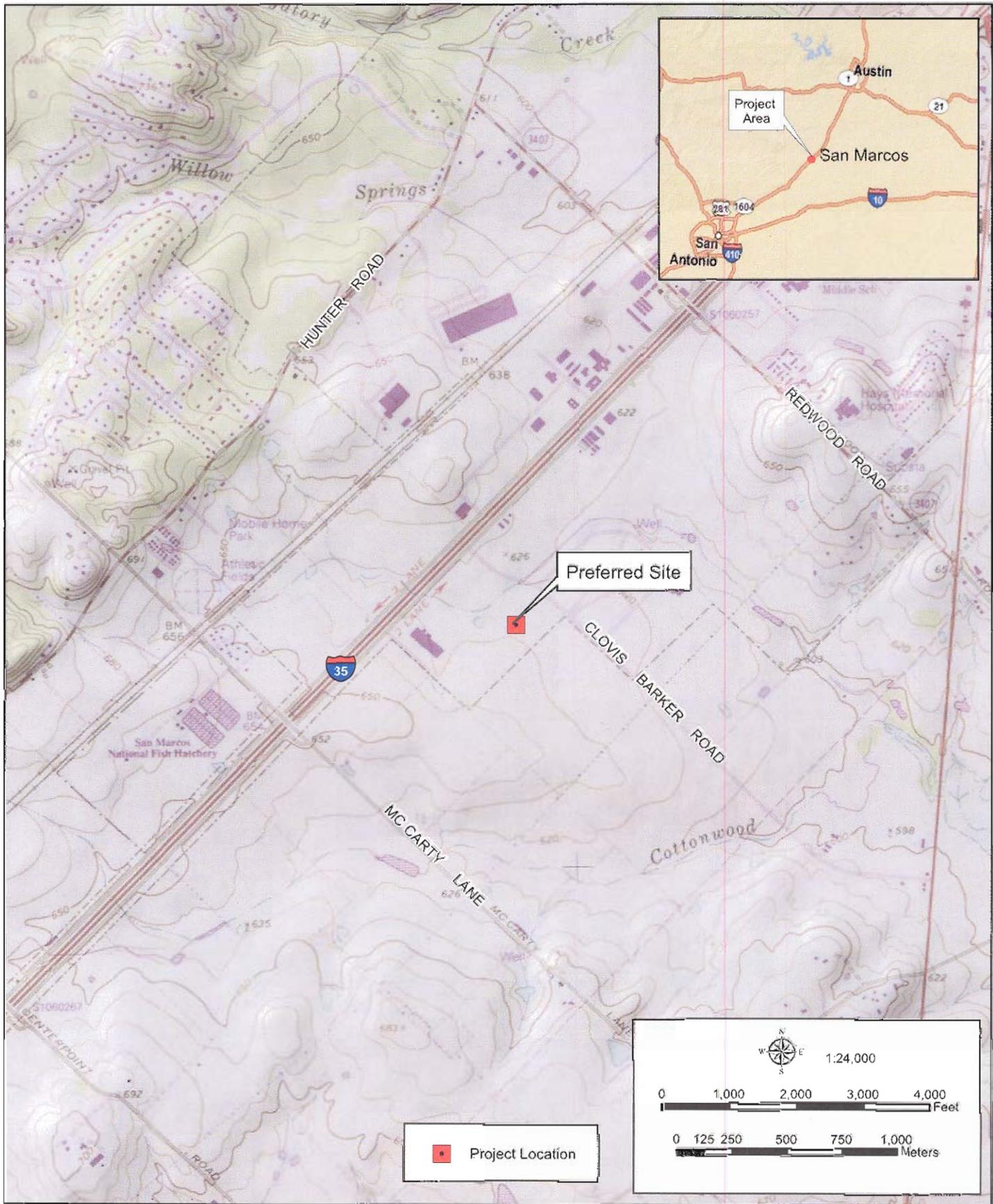
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Sincerely,


Philip L. Hanrahan
Brigadier General, U.S. Army Reserve
Commanding

Enclosure



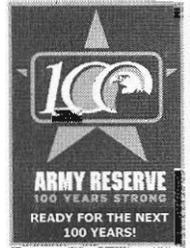
Enclosure A. Vicinity Map



August 2008



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 19, 2008

Environmental Office

Mr. Anthony Street
Tonkawa Tribe of Indians of Oklahoma
P.O. Box 70
Tonkawa, OK 74653

Dear President Street:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate these National Guard units. Although the preferred site encompasses approximately 19 acres, the total amount of disturbed area is expected to be approximately 12 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

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After a thorough search of the archaeological, historic building, and burial indices at the Texas State Historic Preservation Office, we have determined that there are no recorded archaeological sites, no recorded historic structures, and no recorded human burials on the property as described above. If your Tribe, or members of your Tribe, have knowledge of traditional cultural properties, sacred sites, or burials on or near the sites of our project, we request that you notify our representative listed below.

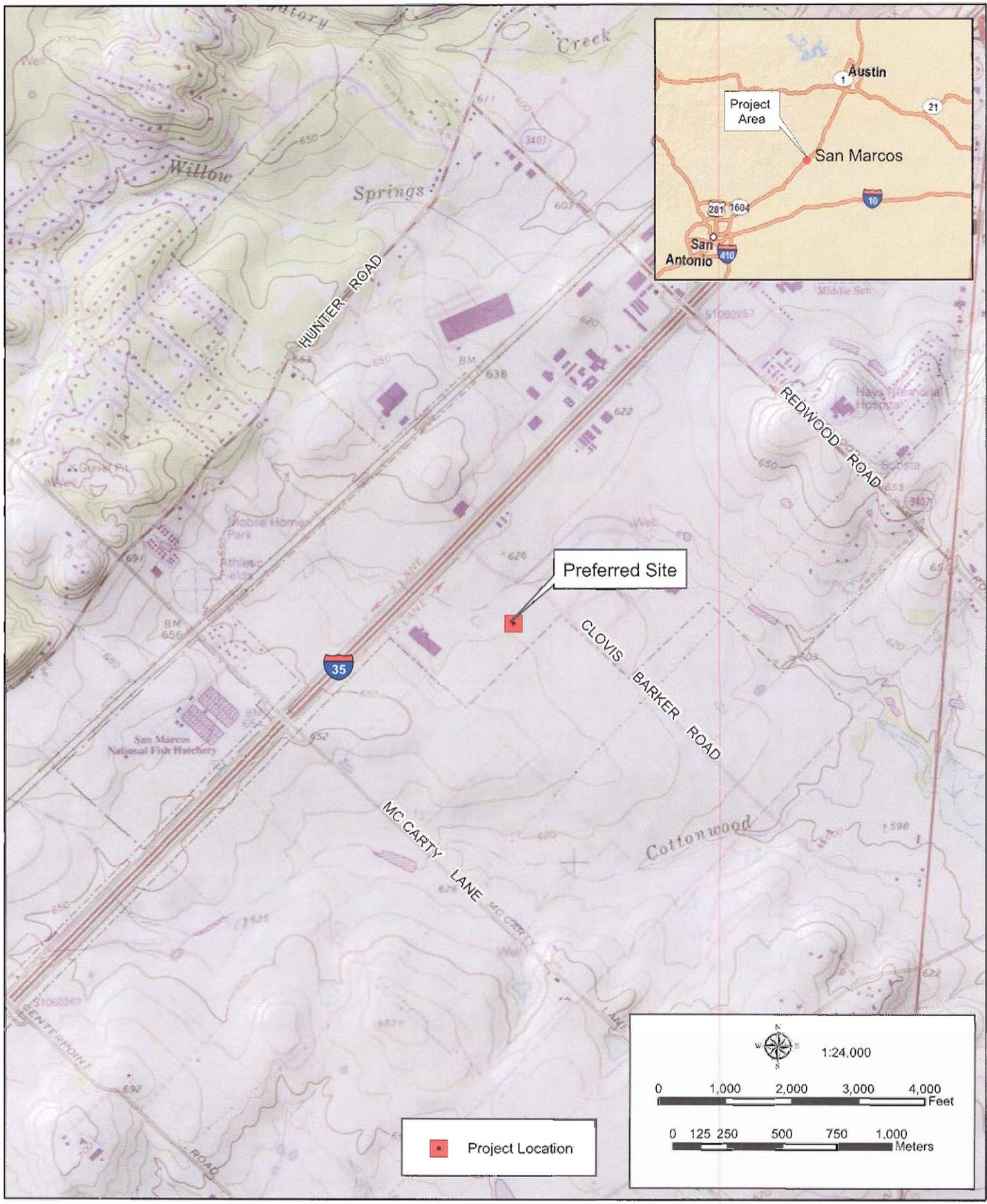
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Sincerely,


Philip L. Hanrahan
Brigadier General, U.S. Army Reserve
Commanding

Enclosure



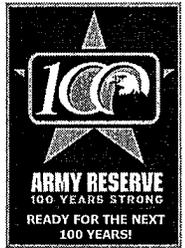
Enclosure A. Vicinity Map



August 2008



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 6, 2008

Environmental Office

Mr. Adam Zerrenner, Field Supervisor
U.S. Fish and Wildlife Service, Region 2
Austin Ecological Services Field Office
U.S. 10711 Burnet Road, Suite 200
Austin, Texas 78758

Dear Mr. Zerrenner:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the existing U.S. Army Reserve Center (USARC) in San Marcos, Texas and relocate the units to a new Armed Forces Reserve Center (AFRC) in San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin and New Braunfels, Texas, if the state decides to relocate these National Guard units. The total amount of disturbed area is expected to be approximately 12 acres, although the preferred site encompasses a total of approximately 19 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

The preferred site for the establishment of the AFRC is located in southeastern San Marcos (see Enclosure A). No other viable site was identified as suitable for the construction of the AFRC. The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location. The site is surrounded by a variety of developments including industrial parks, croplands and hotels, as depicted in the aerial photograph (Enclosure B). Photographs taken during the field surveys in August 2008 are presented on Enclosure C.

A search of the U.S. Fish and Wildlife Service's website indicated 13 species that could potentially occur within Hays County, as presented in the table below. As can be seen from this table, only one of these species (i.e., whooping crane) could potentially use the site for foraging. However, their presence is highly unlikely and any cranes in this region are considered part of a non-essential experimental population.

Common/Scientific Name	Habitat	Potential to occur within Project Site
black-capped Vireo (<i>Vireo atricapilla</i>)	Oak-juniper woodlands with a distinctive, two-layered aspect, shrub and tree layer with open grassy spaces.	No – site does not have suitable habitat.
golden-cheeked warbler (<i>Dendroica chrysoparia</i>)	Ashe-juniper or cedar bark necessary for nest building.	No – site does not have suitable habitat.
whooping crane (<i>Grus americana</i>)	High plains, shortgrass prairies, and bare, dirt fields.	Yes – could forage but not likely due to lack of nesting sites and food sources.
Austin blind salamander (<i>Eurycea waterlooensis</i>)	The subterranean cavities of Edwards Aquifer, Travis County, Texas.	No – site does not have suitable habitat.
Barton Springs salamander (<i>Eurycea sosorum</i>)	Under rocks or in gravel in water several inches to 15 feet deep (TPWD 2007).	No – site does not have suitable habitat.
San Marcos salamander (<i>Eurycea nana</i>)	Spring Lake and an adjacent downstream portion of the upper San Marcos River.	No – site does not have suitable habitat.
Texas blind salamander (<i>Typhlomolge rathbuni</i>)	Water-filled caves of the Edwards Aquifer.	No – site does not have suitable habitat.
fountain darter (<i>Etheostoma fonticola</i>)	Clean, spring-fed waters with bottom vegetation.	No – site does not have suitable habitat.
San Marcos gambusia (<i>Gambusia georgei</i>)	clear spring water coming from the headwaters of the San Marcos River	No – site does not have suitable habitat.
Texas wild-rice (<i>Zizania texana</i>)	Clear flowing spring-fed waters.	No – site does not have suitable habitat.
Peck's cave amphipod (<i>Stygobromus [=Stygonectes] pecki</i>)	Cave-like spring openings flowing from the Edwards Aquifer.	No – site does not have suitable habitat.
Comal Springs riffle beetle (<i>Heterelmis comalensis</i>)	Primary spring-runs and from up-wellings underlying Landa Lake.	No – site does not have suitable habitat.
Comal Springs dryopid beetle (<i>Stygoparnus comalensis</i>)	Cave-like spring openings flowing from the Edwards Aquifer.	No – site does not have suitable habitat.

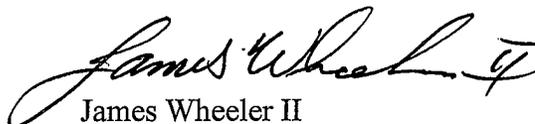
Pedestrian surveys have been completed at the preferred site and none of these species or suitable habitat capable of supporting these species were observed at the project site. The site is in agricultural production (i.e., corn). Fence rows and ditches along the southeastern and northwestern side of the site provide a very thin strip of vegetation containing both native and invasive plant species.

The most common species included blackberry (*Rubus* spp.), sugar hackberry (*Celtis laevigata*), honey mesquite (*Prosopis glandulosa*), false willow (*Baccharis neglecta*), sunflowers (*Helianthus annuus*), switchgrass (*Panicum virgatum*), sideoats grama (*Bouteloua curtipendula*) and Johnson grass (*Sorghum halpense*). No caves, karst formations, streams or wetlands were found on the site, although a drainage canal does occur along the northwestern boundary of the site (see Enclosure C). Wildlife species or sign observed during the recent surveys included white-winged dove (*Zenaida asiatica*), mourning dove (*Zenaida macroura*), great-tailed grackle (*Quiscalus mexicanus*), raccoon (*Procyon lotor*), and white-footed mouse (*Peromyscus leucopus*).

Based on this survey and the existing conditions at and surrounding the preferred site, we have determined that the proposed action would have no effect on Federal or state-listed species. Because of the limited size of the proposed construction footprint and the low quality of habitat at the site, insignificant impacts to general wildlife populations would occur as a result of the proposed construction and operation of the AFRC.

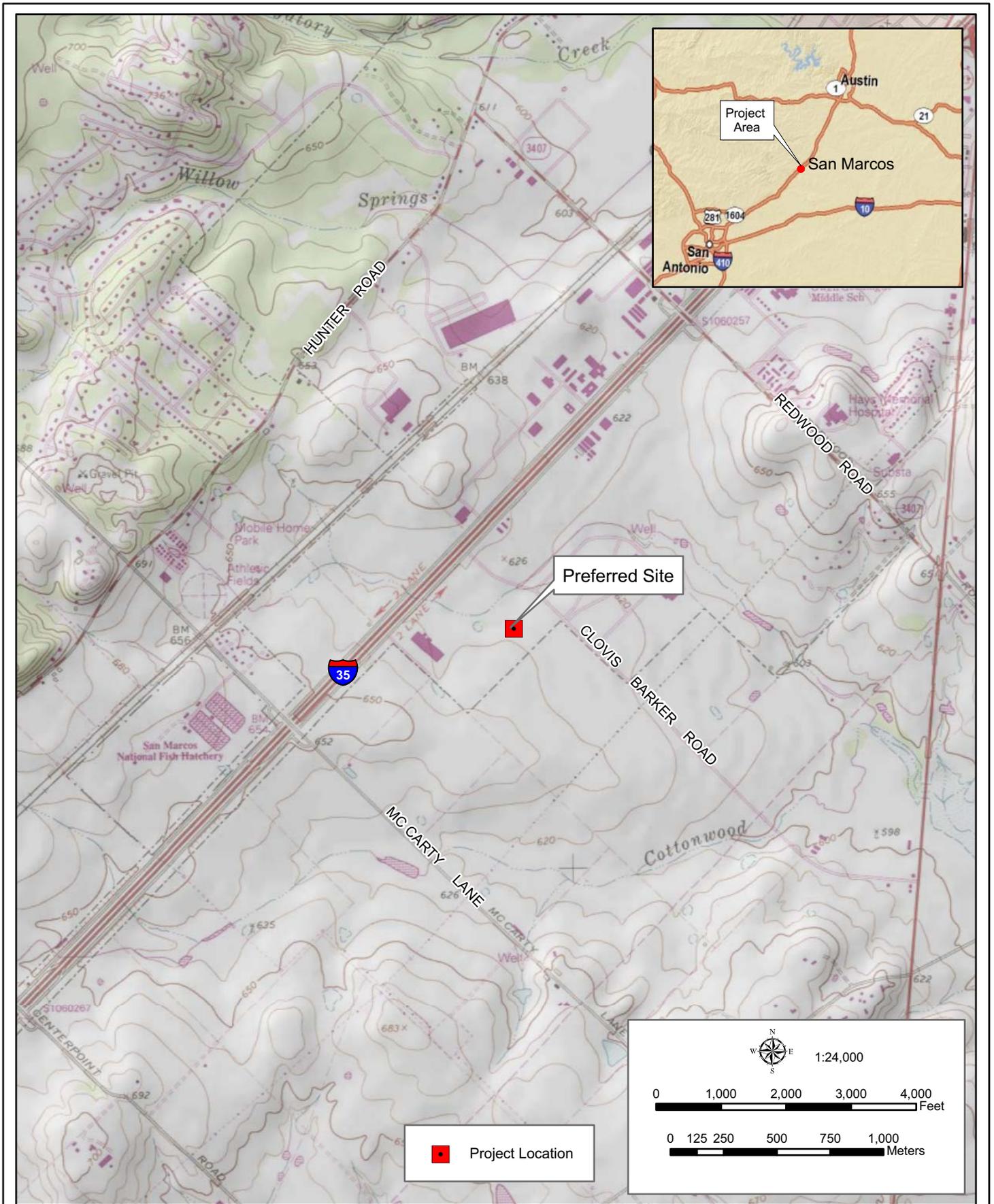
We respectfully request that you provide a written concurrence with our determination. Your prompt attention and cooperation would be greatly appreciated. If you have questions or concerns about this project, please do not hesitate to call me at (501) 771-7992.

Sincerely,



James Wheeler II
Chief, Environmental Division
90th RRC

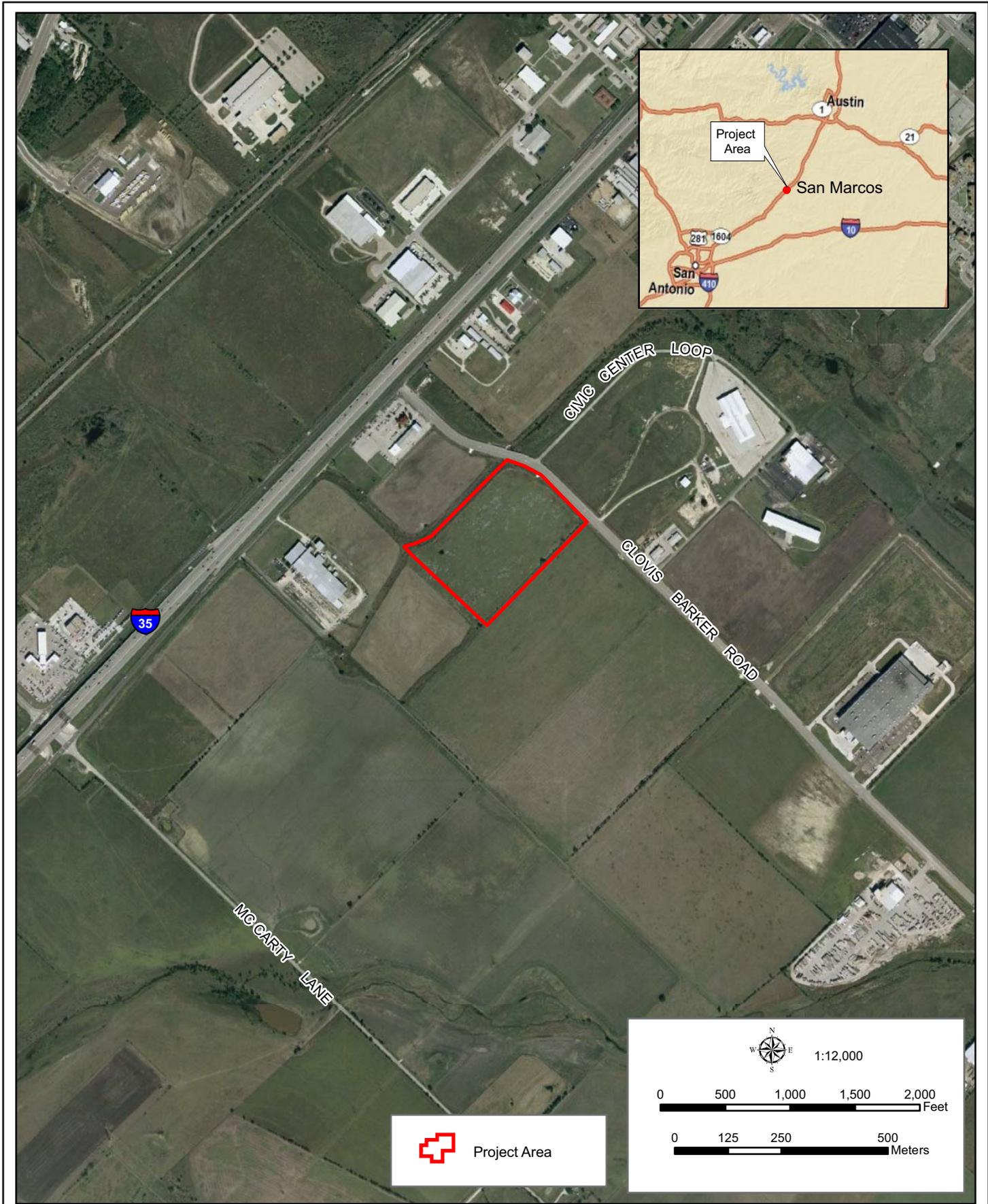
Enclosures (3)



Enclosure A. Vicinity Map



August 2008



Enclosure B. Preferred Site Location



August 2008

Enclosure C
Photographs of Preferred Site
San Marcos AFRC



Photograph 1. Preferred Site Looking WSW from NE Corner

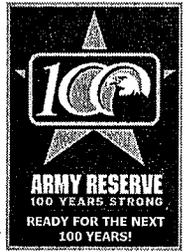
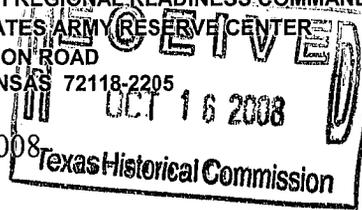


Photograph 2. Drainage Canal Near NW Corner, Looking NW



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205

October 8, 2008



Environmental Office

Mr. F. Lawrence Oaks
State Historic Preservation Officer
ATTN: Mr. Bill Martin
Texas Historical Commission
1511 Colorado Street
Austin, Texas 78701

Dear Mr. Oaks:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas.

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Only one location, the proposed site at San Marcos, Texas, was identified as suitable for the construction of the AFRC (see Enclosure A). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location. The site is surrounded by a variety of developments including industrial parks, croplands and hotels, as depicted in the aerial photograph (Enclosure B).

The Texas Historical Sites Atlas was searched by remote terminal to identify any known archaeological sites, historic structures, historic districts, or historic markers within 1-mile of the project area. The search indicated that one previous survey conducted by Horizon Environmental Services, Inc. (HES) in 2006 was conducted within one-mile of the project area. The HES survey recorded one cultural resources site (41HY418) within the vicinity of this

project area. The site 41HY418 consisted of a low to moderate lithic scatter interpreted as a lithic procurement and early stage reduction site. The site was not recommended eligible for NRHP listing. The site is not located within the preferred project location and no additional previously recorded cultural resources are present within one-mile.

No cultural resources were identified during pedestrian survey or subsurface testing of the proposed San Marcos Tract. In addition, a pedestrian reconnaissance was performed of the view shed of the proposed tract. No structures or buildings that meet the 50 year age minimum for historic structures. As a result, no impacts to cultural resources are anticipated from the implementation of the proposed action alternative.

If activities were to impact cultural resources not previously identified, we will immediately inform you of the discovery and to invite you to assist in the development of procedures for minimizing adverse impacts to the newly discovered cultural resources.

We request your concurrence on our determination that there are "no historic properties affected" by building the proposed AFRC, San Marcos. If you have questions or concerns about this project, please contact me at (501) 771-7992, at your earliest convenience.

Sincerely,

**NO HISTORIC
PROPERTIES AFFECTED
PROJECT MAY PROCEED**

By 
for F. Lawrence Oaks
State Historic Preservation Officer
Date 11/13/09
Track# _____

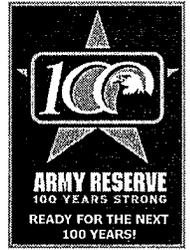


James Wheeler II
Chief, Environmental Division
90th Regional Readiness Command

Enclosures (2)



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 6, 2008

Reply to the Attention of Environmental Office

Mr. Ramiro Garcia, Regional Director
Border and South Central Region
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

Dear Mr. Garcia:

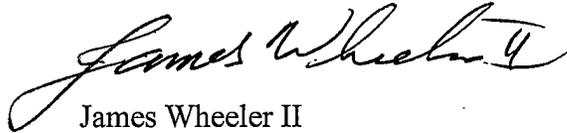
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The preferred site for the establishment of the AFRC is located in southeastern San Marcos (see Enclosure A). No other viable site was identified as suitable for the construction of the AFRC. The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location. The site is surrounded by a variety of developments including industrial parks, croplands and hotels, as depicted in the aerial photograph (Enclosure B). Photographs taken during the field surveys in August 2008 are presented on Enclosure C.

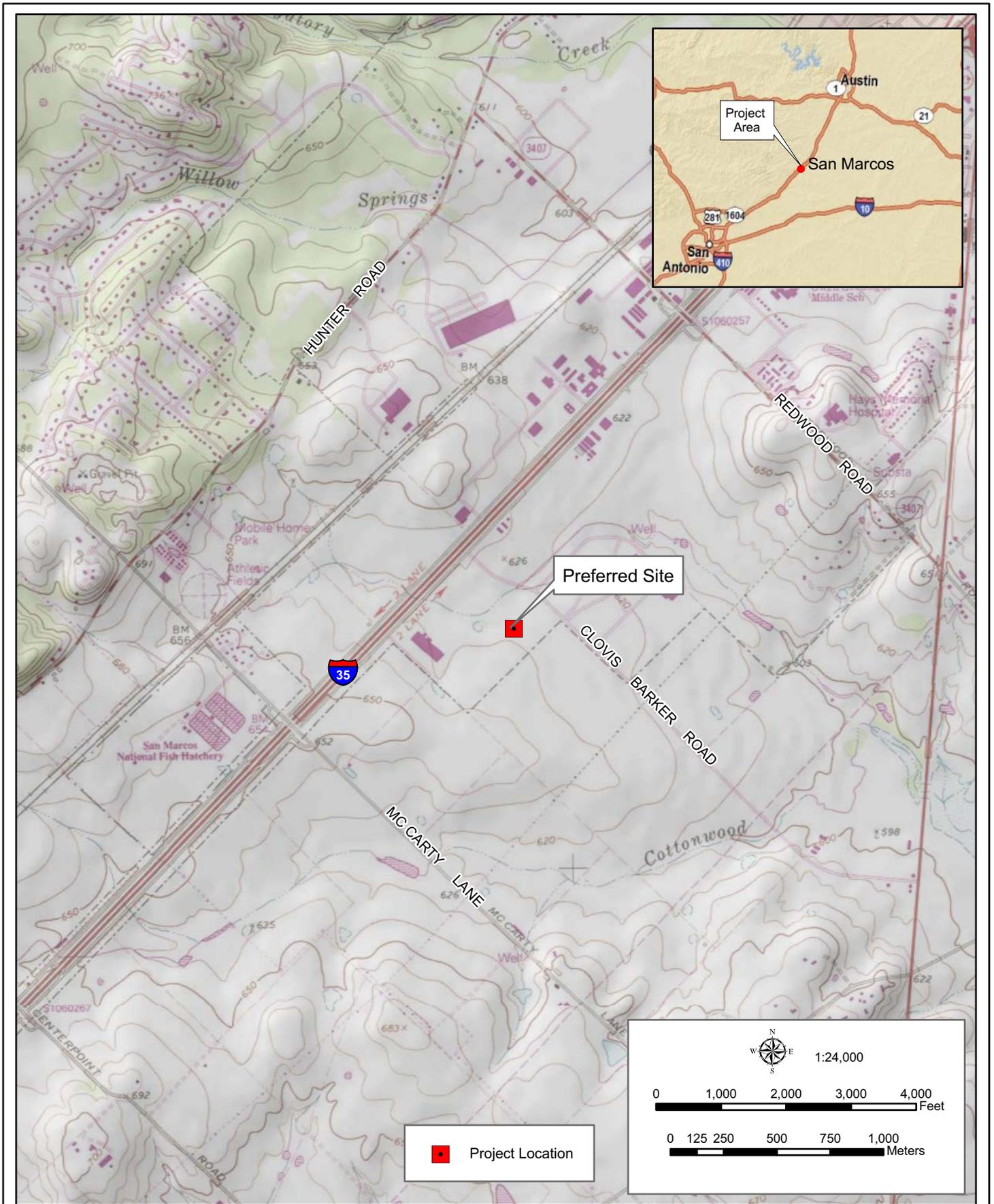
We respectfully request that you provide us with any concerns or issues that you feel should be addressed in this EA. We will send you a copy of the EA when it is released to the public, which is currently anticipated to occur in early November 2008. If you have any questions, please do not hesitate to call me at (501)771-7992.

Sincerely,

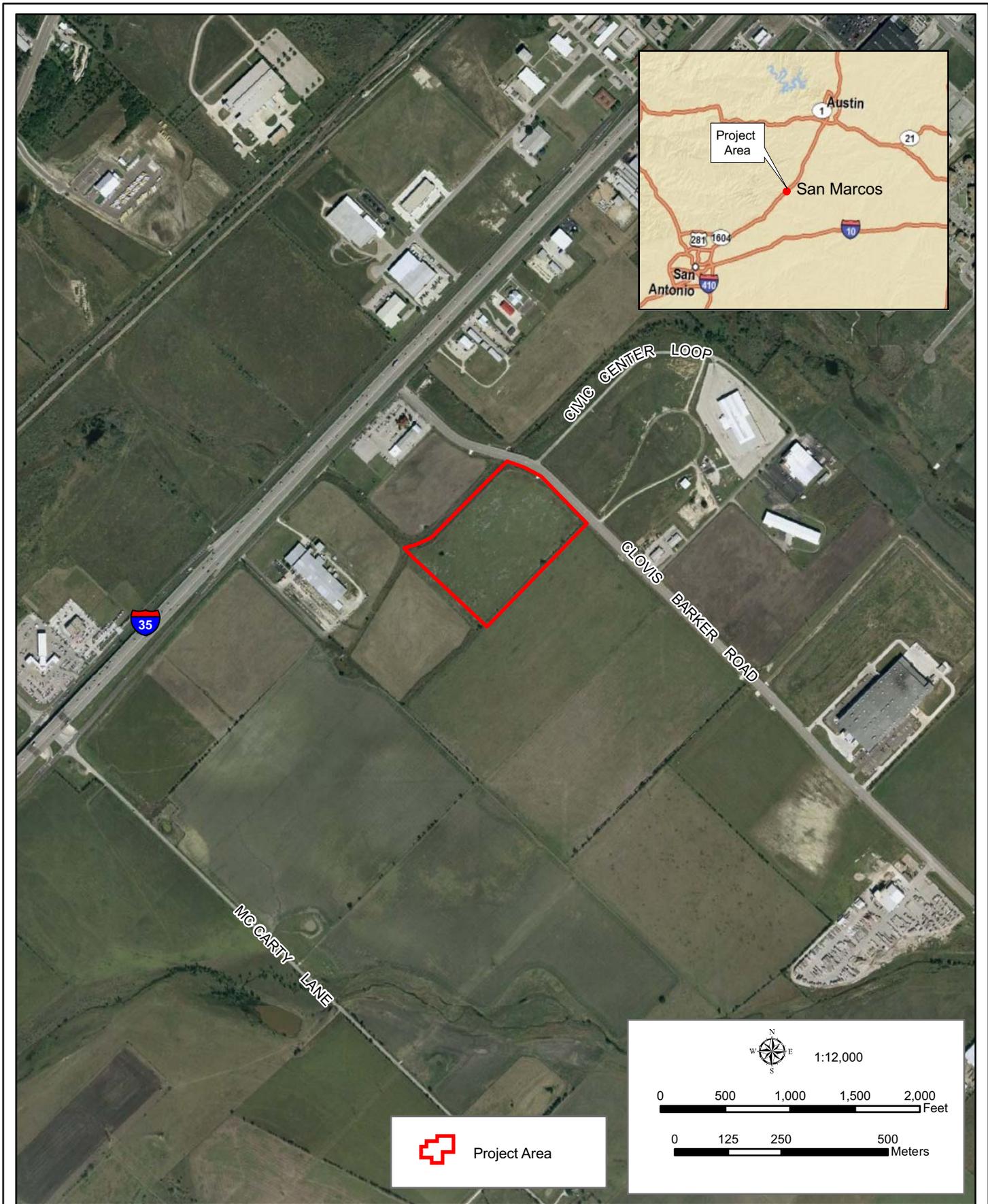
A handwritten signature in cursive script that reads "James Wheeler II". The signature is written in black ink and is positioned above the typed name.

James Wheeler II
Chief, Environmental Division
90th RRC

Enclosures (3)



Enclosure A. Vicinity Map



Enclosure B. Preferred Site Location



August 2008

Enclosure C
Photographs of Preferred Site
San Marcos AFRC



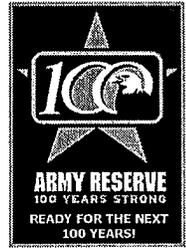
Photograph 1. Preferred Site Looking WSW from NE Corner



Photograph 2. Drainage Canal Near NW Corner, Looking NW



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 6, 2008

Reply to the Attention of Environmental Office

Ms. Kathy Boydson
Wildlife Diversity Program
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, TX 78744

Dear Ms. Boydson:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the existing U.S. Army Reserve Center (USARC) in San Marcos, Texas and relocate the units to a new Armed Forces Reserve Center (AFRC) in San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin and New Braunfels, Texas, if the state decides to relocate these National Guard units. The total amount of disturbed area is expected to be approximately 12 acres, although the preferred site encompasses a total of approximately 19 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

The preferred site for the establishment of the AFRC is located in southeastern San Marcos (see Enclosure A). No other viable site was identified as suitable for the construction of the AFRC. The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location. The site is surrounded by a variety of developments including industrial parks, croplands and hotels, as depicted in the aerial photograph (Enclosure B). Photographs taken during the field surveys in August 2008 are presented on Enclosure C.

A search of the U.S. Fish and Wildlife Service's website indicated 13 species that could potentially occur within Hays County. In addition to these species, the Texas Parks and Wildlife Department indicates that the Plains spotted skunk (*Spilogale putorius interrupta*) and Texas horned lizard (*Phrynosoma cornutum*) could also occur within Hays County.

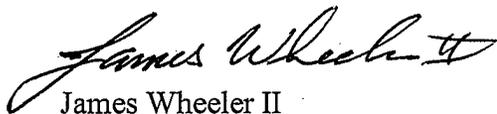
Pedestrian surveys have been completed at the preferred site and none of these species or suitable habitat capable of supporting these species were observed at the project site. The site is in agricultural production (i.e., corn). Fence rows and ditches along the southeastern and northwestern side of the site provide a very thin strip of vegetation containing both native and invasive plant species. The most common species included blackberry (*Rubus* spp.), sugar hackberry (*Celtis laevigata*), honey mesquite (*Prosopis glandulosa*), false willow (*Baccharis neglecta*), sunflowers (*Helianthus annuus*), switchgrass (*Panicum virgatum*), sideoats grama (*Bouteloua curtipendula*) and Johnson grass (*Sorghum halpense*). No caves, karst formations, streams or wetlands were found on the site, although a drainage canal does occur along the northwestern boundary of the site (see Enclosure C). Wildlife species or sign observed during the recent surveys included white-winged dove (*Zenaida asiatica*), mourning dove (*Zenaida macroura*), great-tailed grackle (*Quiscalus mexicanus*), raccoon (*Procyon lotor*), and white-footed mouse (*Peromyscus leucopus*).

The skunk could possibly use the narrow strips of vegetation and drainage canal for travel corridors; however, given the amount of development around the preferred site, it is unlikely that this species would occur at the site. Vegetation and crops are too dense to provide suitable habitat for Texas horned lizard.

Based on these surveys and the existing conditions at and surrounding the preferred site, we have determined that the proposed action would have no effect on Federal or state-listed species. Because of the limited size of the proposed construction footprint and the low quality of habitat at the site, insignificant impacts to general wildlife populations would occur as a result of the proposed construction and operation of the AFRC.

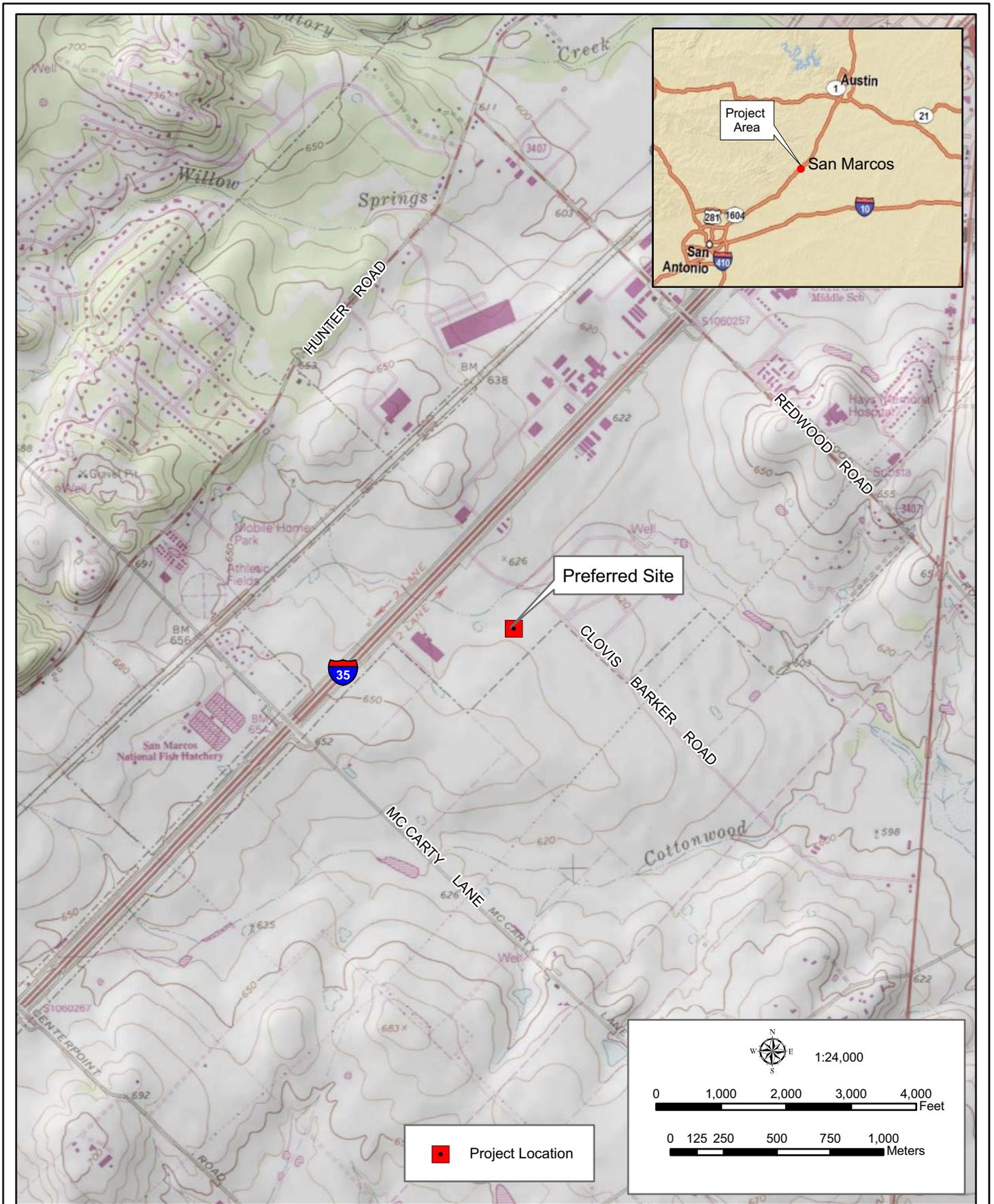
We respectfully request that you provide a written concurrence with our determination. Your prompt attention and cooperation would be greatly appreciated. If you have questions or concerns about this project, please do not hesitate to call me at (501) 771-7992.

Sincerely,



James Wheeler II
Chief, Environmental Division
90th RRC

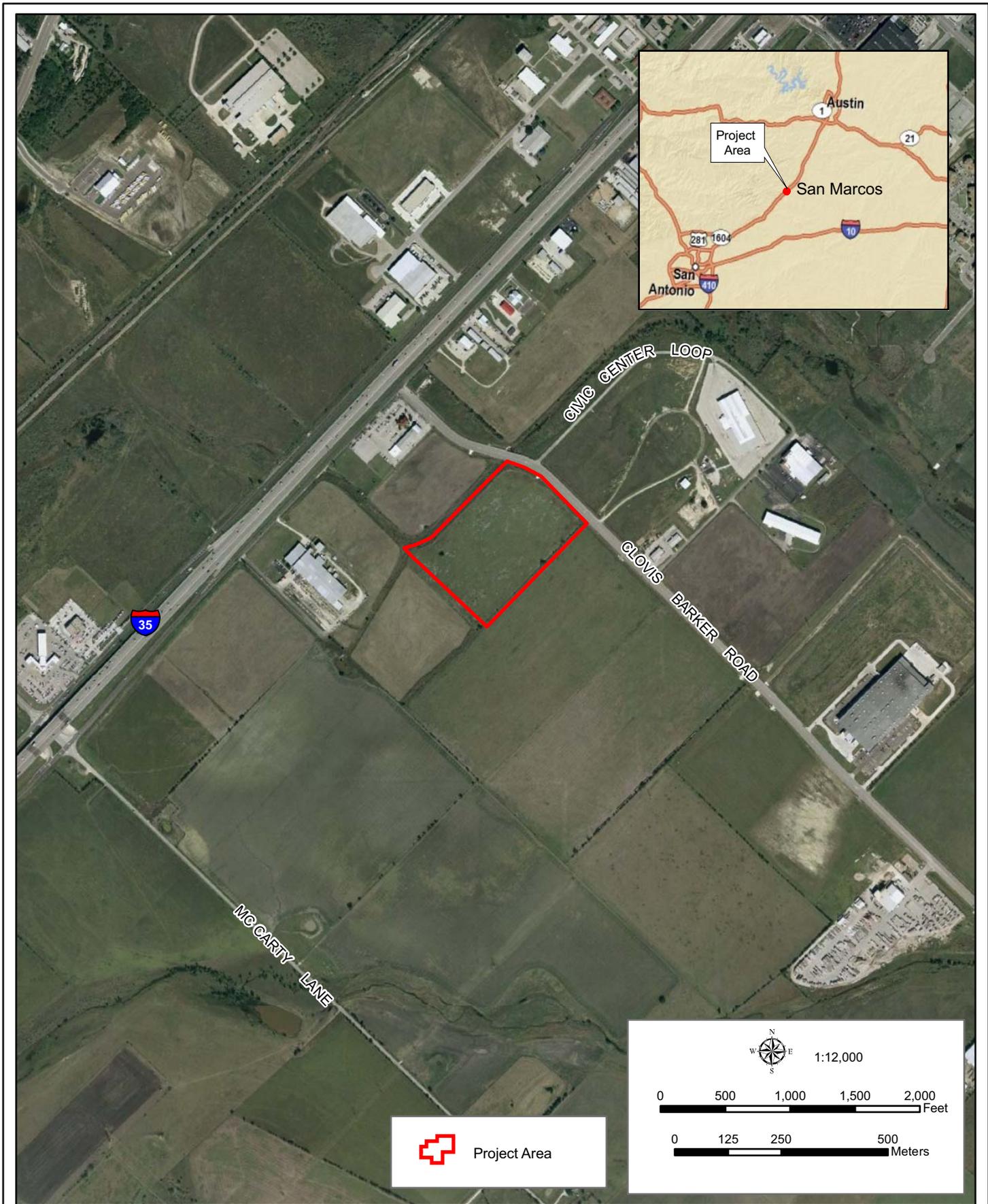
Enclosures (3)



Enclosure A. Vicinity Map



August 2008



Enclosure B. Preferred Site Location



August 2008

Enclosure C
Photographs of Preferred Site
San Marcos AFRC



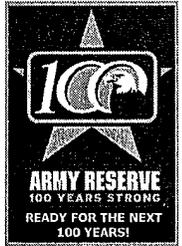
Photograph 1. Preferred Site Looking WSW from NE Corner



Photograph 2. Drainage Canal Near NW Corner, Looking NW



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 90TH REGIONAL READINESS COMMAND
CAPTAIN MAURICE L. BRITT UNITED STATES ARMY RESERVE CENTER
8000 CAMP ROBINSON ROAD
NORTH LITTLE ROCK, ARKANSAS 72118-2205



October 8, 2008

Environmental Office

Mr. F. Lawrence Oaks
State Historic Preservation Officer
ATTN: Mr. Bill Martin
Texas Historical Commission
1511 Colorado Street
Austin, Texas 78701

Dear Mr. Oaks:

The Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, implements recommendations made during the fall of 2005, by the Defense Base Closure and Realignment Commission (BRAC Commission). One of the proposed actions is to close the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas.

The new facility will have the capability to accommodate Texas National Guard units from the following Texas Army National Guard Readiness Centers: San Marcos, Sequin, and New Braunfels, TX, if the state decides to relocate these National Guard units. Although the preferred site encompasses approximately 19 acres, the total amount of disturbed area is expected to be approximately 12 acres. No additional weapons systems or demands on training ranges are required for the proposed action.

Only one location, the proposed site at San Marcos, Texas, was identified as suitable for the construction of the AFRC (see Enclosure A). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential impacts of constructing and operating the new AFRC at this location. The site is surrounded by a variety of developments including industrial parks, croplands and hotels, as depicted in the aerial photograph (Enclosure B).

The Texas Historical Sites Atlas was searched by remote terminal to identify any known archaeological sites, historic structures, historic districts, or historic markers within 1-mile of the project area. The search indicated that one previous survey conducted by Horizon Environmental Services, Inc. (HES) in 2006 was conducted within one-mile of the project area. The HES survey recorded one cultural resources site (41HY418) within the vicinity of this

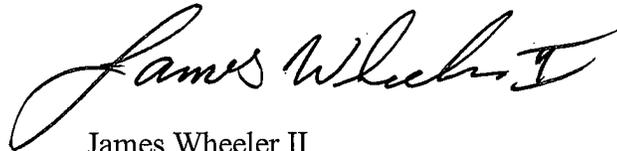
project area. The site 41HY418 consisted of a low to moderate lithic scatter interpreted as a lithic procurement and early stage reduction site. The site was not recommended eligible for NRHP listing. The site is not located within the preferred project location and no additional previously recorded cultural resources are present within one-mile.

No cultural resources were identified during pedestrian survey or subsurface testing of the proposed San Marcos Tract. In addition, a pedestrian reconnaissance was performed of the view shed of the proposed tract. No structures or buildings that meet the 50 year age minimum for historic structures. As a result, no impacts to cultural resources are anticipated from the implementation of the proposed action alternative.

If activities were to impact cultural resources not previously identified, we will immediately inform you of the discovery and to invite you to assist in the development of procedures for minimizing adverse impacts to the newly discovered cultural resources.

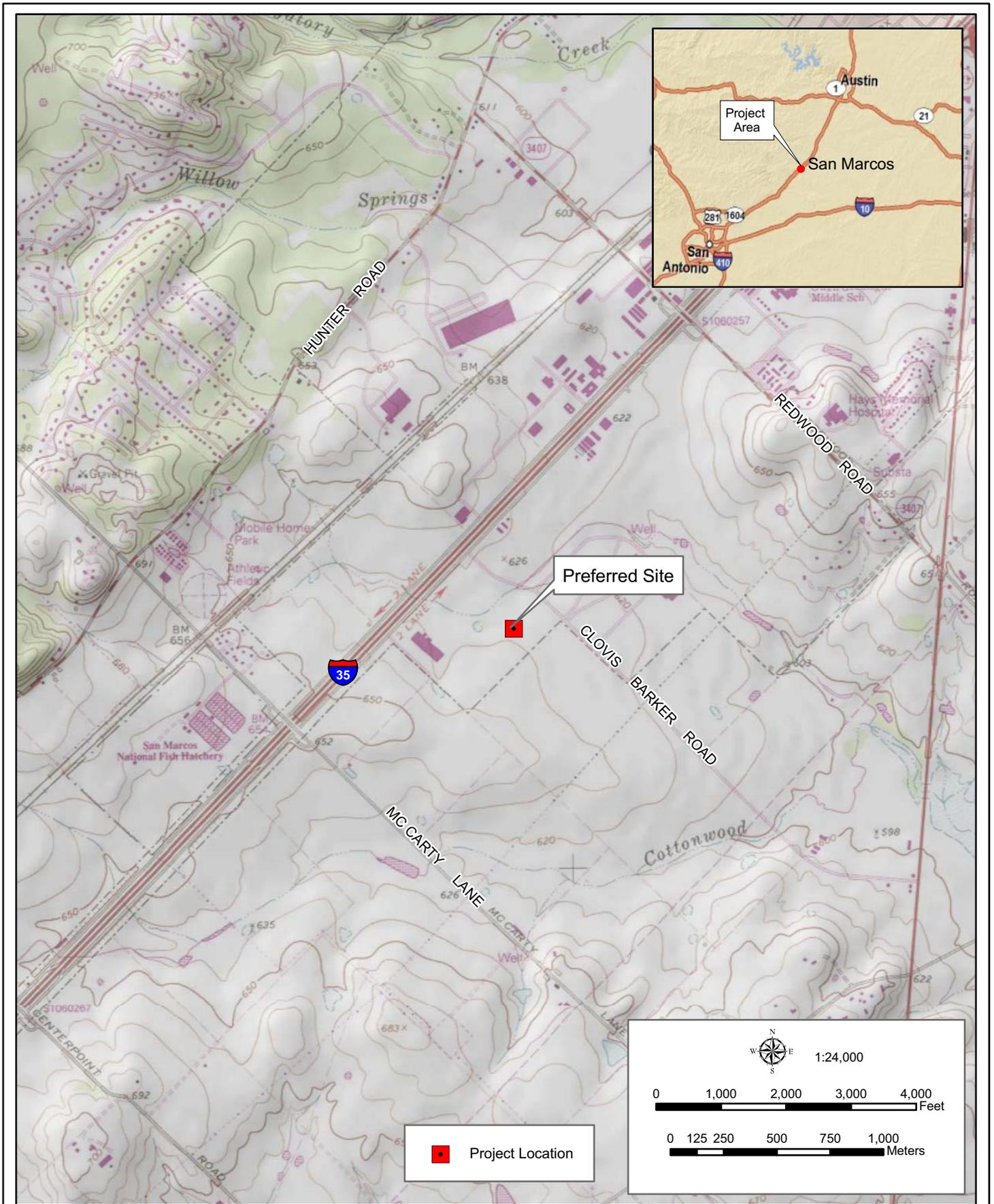
We request your concurrence on our determination that there are "no historic properties affected" by building the proposed AFRC, San Marcos. If you have questions or concerns about this project, please contact me at (501) 771-7992, at your earliest convenience.

Sincerely,

A handwritten signature in cursive script that reads "James Wheeler II". The signature is written in dark ink and is positioned above the typed name and title.

James Wheeler II
Chief, Environmental Division
90th Regional Readiness Command

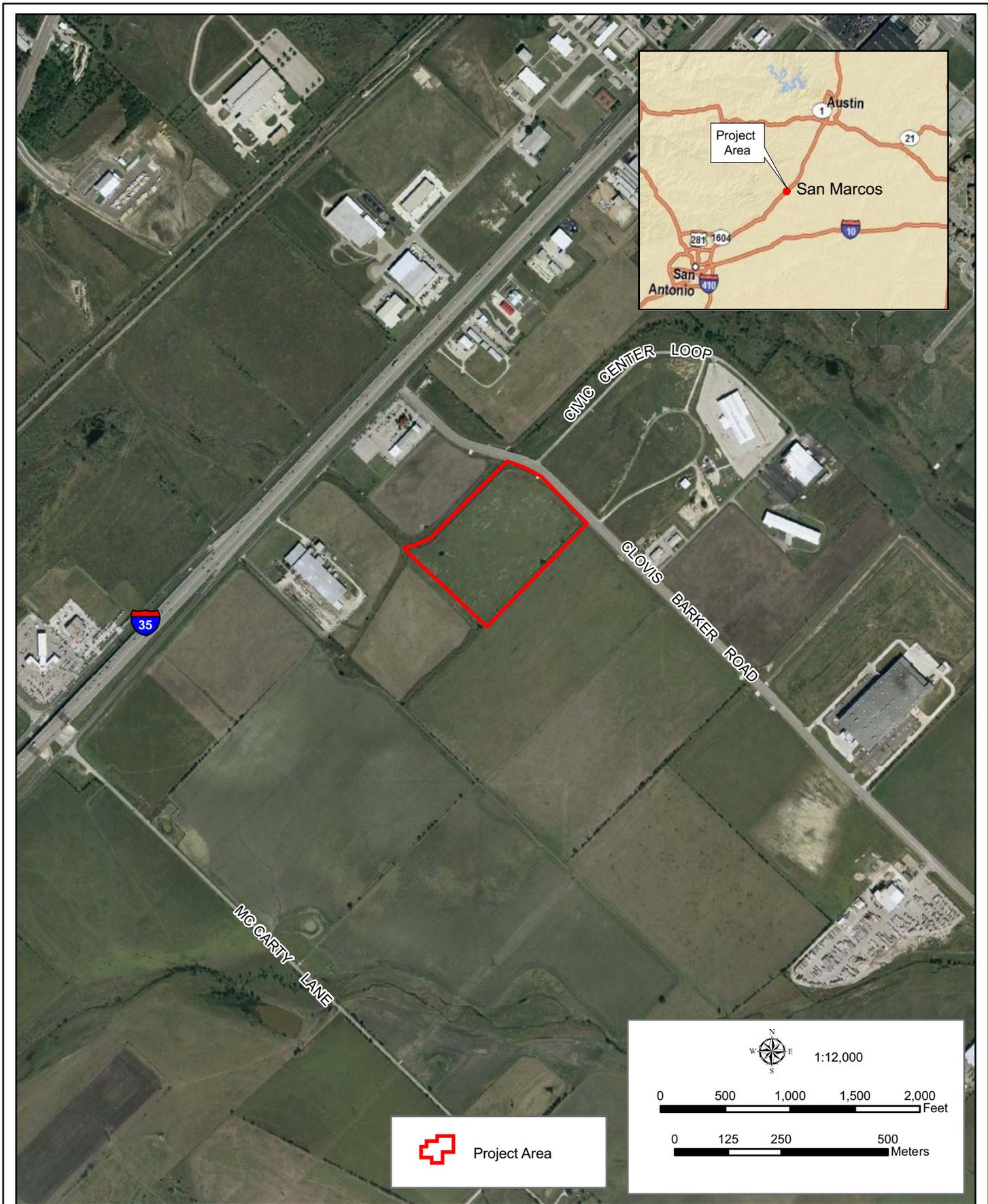
Enclosures (2)



Enclosure A. Vicinity Map



August 2008



Enclosure B. Preferred Site Location



August 2008

The most common species included blackberry (*Rubus* spp.), sugar hackberry (*Celtis laevigata*), honey mesquite (*Prosopis glandulosa*), false willow (*Baccharis neglecta*), sunflowers (*Helianthus annuus*), switchgrass (*Panicum virgatum*), sideoats grama (*Bouteloua curtipendula*) and Johnson grass (*Sorghum halpense*). No caves, karst formations, streams or wetlands were found on the site, although a drainage canal does occur along the northwestern boundary of the site (see Enclosure C). Wildlife species or sign observed during the recent surveys included white-winged dove (*Zenaida asiatica*), mourning dove (*Zenaida macroura*), great-tailed grackle (*Quiscalus mexicanus*), raccoon (*Procyon lotor*), and white-footed mouse (*Peromyscus leucopus*).

Based on this survey and the existing conditions at and surrounding the preferred site, we have determined that the proposed action would have no effect on Federal or state-listed species. Because of the limited size of the proposed construction footprint and the low quality of habitat at the site, insignificant impacts to general wildlife populations would occur as a result of the proposed construction and operation of the AFRC.

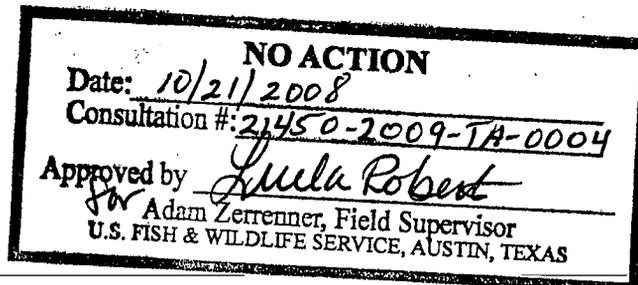
We respectfully request that you provide a written concurrence with our determination. Your prompt attention and cooperation would be greatly appreciated. If you have questions or concerns about this project, please do not hesitate to all me at (501) 771-7992.

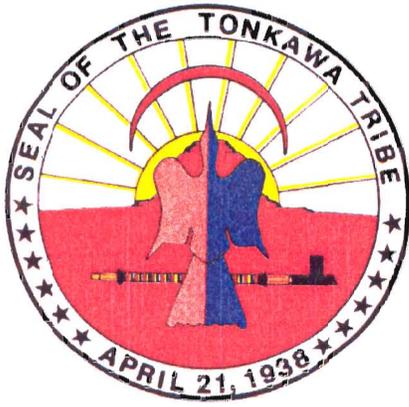
Sincerely,



James Wheeler II
Chief, Environmental Division
90th RRC

Enclosures (3)





TONKAWA TRIBE OF OKLAHOMA
TONKAWA TRIBAL COUNCIL

• 1 RUSH BUFFALO ROAD, TONKAWA, OKLAHOMA 74653 •
• PHONE (580) 628-2561 • FAX: (580) 628-3375 •
WEB SITE: www.tonkawatribe.com

Department of the Army
Headquarters, United States Army 90th Readiness Command
Captain Maurice L. Britt United States Army Reserve Center
8000 Camp Robinson Road
North Little Rock, Arkansas 72118-2205

Date: October 28, 2008

Dear Phillip L. Hanrahan:

In response to the letters from your office dated October 19, 2008 regarding closure of the San Marcos U.S. Army Reserve Center (USARC) in San Marcos and relocate the units to a new Armed Forces Reserve Center (AFRC) at San Marcos, Texas, and close the Round Rock U.S. Army Reserve Center (USARC) in Round Rock and realign the units to a new Armed Forces Reserve Center (AFRC) with a Field Maintenance Shop at Round Rock, Texas, we submit the following: The Tonkawa Tribe has no specifically designated historical or cultural sites identified in the above listed project area. However if any human remains, funerary objects, or other evidence of historical or cultural significance is inadvertently discovered then the Tonkawa Tribe would certainly be interested in proper disposition thereof.

We appreciate notification by your office of the many projects on-going, and as always the Tonkawa Tribe is willing to work with your representatives in any manner to uphold the provisions of NAGPRA to the extent of our capability.

Respectfully,

A handwritten signature in purple ink, appearing to read "Maurice L. Britt", with a long horizontal flourish extending to the right.

NAGPRA Representative

A handwritten signature in blue ink, appearing to read "Jim Sch...", with a long horizontal flourish extending to the right.

Concurrence:

Tonkawa Tribe Business Committee

APPENDIX D
Economic Impact Forecast System

Analysis of Socioeconomic Effects For San Marcos Reserve Center Realignment for BRAC05

Introduction

The socioeconomic analysis requirements of NEPA have been established over the years through successful early NEPA litigation (“McDowell vs Schlesinger”, US District Court, Western District of Missouri, Western Division, No. 75-CV-234-W-4 (June 19,1975) and “Breckinridge vs Schlesinger”, US District Court, Eastern District of Kentucky, No. 75-100 (October 31,1975)), as well as the practical need for communication and collaboration with affected communities. The social and economic effects of Base Realignment and Closure (BRAC) actions are especially relevant and important, as these issues are often the source of community concerns and subsequent controversies.

The Economic Impact Forecast System (EIFS) and the Hierarchical Approach.

The Model:

The Economic Impact Forecast System (EIFS) (Huppertz, Claire E.; Bloomquist, Kim M.; Barbehenn, Jacinda M.; EIFS 5.0 Economic Impact Forecast System, User’s Reference Manual; USACERL Technical Report TA-94/03; July 1994.) has been a mainstay of Army NEPA practice since its initial development and implementation in the mid-70s. EIFS provides a mechanism to estimate impacts, and ascertain the “significance” of projected impacts, using the Rational Threshold Value (RTV) technique. This analysis and determination can be readily documented, and if significance thresholds are not exceeded, the analysis can be completed. EIFS was designed to address NEPA applications, providing a “two-tier” approach to the process; (1) a simple and quick aggregate model (sufficient to ascertain the overall magnitude of impacts) and (2) a more detailed, sophisticated input-output (I-O) model to further analyze impacts that appear significant, in NEPA terms, and worthy of additional expenditures and analyses. This “two-tier” approach is consistent with the two common levels of NEPA analysis, the Environmental Assessment (EA) and the Environmental Impact Statement (EIS). EIFS has facilitated efficient and effective completion of such analyses for approximately 3 decades.

Complete documentation of the model, its development, and applicable theoretical underpinnings is available in numerous publications:

- Huppertz, Claire E.; Bloomquist, Kim M.; Barbehenn, Jacinda M.; EIFS 5.0 Economic Impact Forecast System, User’s Reference Manual; USACERL Technical Report TA-94/03; July 1994.
- Isard, W., Methods of Regional Analysis, MIT Press, 1960.
- Isard, W. and Langford, T., Regional Input-Output Study: Recollections, Reflections, and Diverse Notes on the Philadelphia Experience, MIT Press, 1971.
- Isserman, A., "The Location Quotient Approach to Estimating Regional Economic Impacts", AIP Journal, January, 1977, pp. 33-41.

- Isserman, A., "Estimating Export Activity in a Regional Economy: A Theoretical and Empirical Analysis of Alternative Methods", International Regional science Review, Vol. 5, 1980, pp. 155-184.
- Leigh, R., " The Use of Location Quotients in Urban Economic Base Studies", Land Economics, Vol 46, May, 1970, pp 202-205.
- Mathur, V.K. and Rosen, H.S. , "Regional Employment Multiplier: A new Approach", Land Economics, Vol 50, 1974, pp 93-96.
- Mayer, W. and Pleeter, S., "A Theoretical Justification for the Use of Location Quotients", Regional Science and Urban Economics, Vol 5, 1975, pp 343-355.
- Robinson, D.P., Hamilton, J.W., Webster, R.D., and Olson, M.J., Economic Impact Forecast System (EIFS) II: User's Manual, Updated Edition, Technical Report N-69/ADA144950, U.S. Army Construction Engineering Research Lab (USACERL),1984.
- Robinson, D.P. and Webster,R.D., Enhancements to the Economic Impact Forecast System (EIFS), Technical Report N-175/ADA142652, USACERL, April, 1984.
- Rogers, Claudia and Webster, Ron, "Qualitative Answers to Quantitative Questions", Impact Assessment, IAIA, Vol.12, No.1, 1999.
- Thompson, W., A Preface to Urban Economics, Johns Hopkins Press, 1965.
- Tiebout, C., The Community Economic Base, New York Committee for Economic Development, 1962.
- USACERL, " Methods for Evaluating the Significance of Impacts: The RTV and FSI Profiles"; USACERL EIFS Tutorial; July 1987.
- U.S. Army, Department of the Army, DA Pamphlet 200-2, "Economic Impact Forecast System-User Instructions", 1980.
- U.S. Army, "Base Realignment and Closure "How-To" Manual for Compliance with the National Environmental Policy Act", revised and published as official Department of Army Guidance, 1995.
- U.S. Army, Army Regulation 5-20, "Commercial Activities"
- U.S. Army, Department of the Army, DA Pamphlet 200-2, "Economic Impact Forecast System-User Instructions", 1980
- Webster, R.D.and Shannon, E.; The Rational Threshold Value (RTV) Technique for the Evaluation of Regional Economic Impacts; USACERL Technical Report TR N-49/ADA055561; 1978.
- Webster, R.D., Hamilton, J.W., and Robinson, D.P., "The Two-Tier Concept for Economic Analysis: Introduction and User Instructions", USACERL Technical Report N-127/ADA118855.

These efforts reflect development of a tool for specific NEPA application, following the successful NEPA litigation referenced in the Introduction. As EIFS has been used for Army NEPA analyses, the results of EIFS analyses have been reviewed by stakeholder (affected community) representatives, and, as a result of BRAC application, twice reviewed by the Government Accounting Office (GAO). During such reviews, the analyses and resultant decisions were upheld, and EIFS was lauded as a uniform (non-arbitrary and non-capricious) approach to such requirements. Drawing from a national, uniform database, and using a common, systematic approach, EIFS allowing the improved comparison of project alternatives (the heart of NEPA analysis), and provides comparable analyses across the U.S.

NEPA Process Improvement:

Since NEPA was implemented, it has been commonly criticized as expensive and time-consuming. While these criticisms have been often justified, the President's Council on Environmental Quality (CEQ) has actively promoted NEPA process improvements; first

in the publication of the CEQ NEPA regulations (CEQ, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, Reprint, 40 CFR Parts 1500-1508, Executive Office of the President, Council on Environmental Quality, 1992.), and, more recently, through a NEPA anniversary introspective (CEQ, The National Environmental Policy Act: A Study of its Effectiveness After Twenty-five Years, Executive Office of the President, Council on Environmental Quality, January, 1997.) and the formal CEQ NEPA Task Force (CEQ, The NEPA Task Force Report to the Council on Environmental Quality: Modernizing NEPA Implementation; September, 2003.). All three CEQ initiatives call for more "focus" on NEPA documents, eliminating the analyses of minor or unimportant issues, and focusing, instead, on those issues that should be part of an informed agency decision. The use of EIFS, and the "two-tier" approach is consistent with these CEQ recommendations.

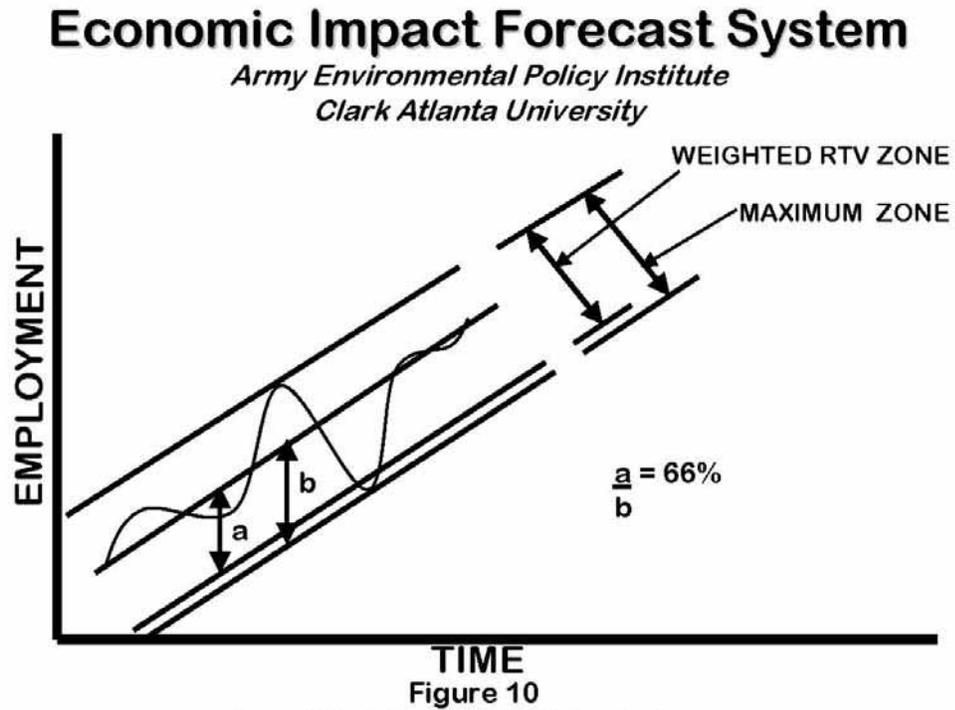
Determining Significance:

While EIFS was being developed, communities began to question the rationale for determining the significance of socioeconomic impacts. USACERL was directed to develop a defensible procedure for such a determination, resulting in the Rational Threshold Value (RTV) technique (Webster, R.D.; and Shannon, E.; The Rational Threshold Value (RTV) Technique for the Evaluation of Regional Economic Impacts; USACERL Technical Report TR N-49/ADA055561; 1978). This technique relies on the yearly Bureau of Economic Analysis (BEA) time series data on employment, income, and population to evaluate historical trends within a subject community (region); and uses those trends to measure the "resilience" of the local community to change, or its ability to accommodate such change. This approach has worked well when communicating with affected communities. The combined use of RTV with the EIFS model meet the two pronged approach for significance determinations, intensity and context (CEQ, 1992)

The initial EIFS implementation (USACERL, 1975) included the analysis of numerous variables: business volume, personal income, employment, government revenues and expenditures, income and employment distribution, local housing impacts, regional economic stability, school system impacts, government bond obligations, population, welfare and dependency, social control, and aesthetic considerations. These selection of these variables was based on the predictive capability of forecasting techniques and data availability. Over some 30 years of practice, pragmatism and sufficiency led to the use of sales volume, employment, personal income, and population as indicators of impacts (as a "first tier" approximation of effects). These effects can also be readily evaluated (and significance determined) using the BEA time series data. Population, important in its own right, is also a valuable indicator of other factors (e.g., impact on local government revenues and expenditures, housing, local school systems, and the change in welfare and dependency), as impacts on such variables are driven, to a large extent, by a population change.

Using BEA time series data is used to analyze the four variables for the ROI, the RTV model produces thresholds for assessing the magnitude of impacts. The RTV technique is

simple, starting with a straight line between the first year of record and the last year of record for that variable, establishing the average rate of change over time. Then, each yearly deviation from that growth rate is calculated and converted to a percentage. The largest historical changes (both increase and decrease) are used to define significance thresholds. The following figure illustrates the RTV concept:



A "factor of safety" is applied to negative thresholds, as shown in the figure, to produce a conservative analysis; while 100% of the maximum positive thresholds is used; as indicated below:

	<u>Increase</u>	<u>Decrease</u>
Total sales volume	100 percent	75 percent
Total employment	100 percent	66 percent
Personal Income	100 percent	66 percent
Total population	100 percent	50 percent

The maximum positive historical fluctuation is used because of the positive connotations generally associated with economic growth. While economic growth can produce

unacceptable impacts and the "smart growth" concept is increasingly favored, the effects of reductions and closures are usually much more controversial. These adjustments, while arbitrary, are sensible. The negative sales volume threshold is adjusted by 75%, as sales volume impacts can be absorbed by such factors as the manipulation of inventory, new equipment, etc; and the impacts on individual workers or proprietors is indirect, if at all. Changes in employment and income, however, are impacts that immediately affect individuals; thus they are adjusted by 66%. Population is extremely important, as an indicator of other social issues, and is thus adjusted by 50%.

To adjust dollar amounts for inflation (to create "constant dollars" prior to calculations), the Consumer Price Index (CPI) is used for appropriate years, and all dollar values are adjusted to 1987 equivalents.

The main strength of the RTV approach stems from its reliance on data for each individual ROI. This approach addressed previous criticism of more simple approaches that applied arbitrary criteria to all communities. This approach establishes unique criteria, representative of local community patterns, and, while a community may not completely agree, a common frame of reference is established. Critics of the RTV technique have questioned the arbitrary selection of the maximum allowable deviations to indicate impact significance, but the process has proven workable over the years.

The Application of EIFS to the Proposed Action

To effect these analyses, the inputs to the EIFS model must be estimated. The normal EIFS inputs include:

- Number of affected (moving) civilians and their salaries
- Number of affected (moving) military employees and their salaries
- Percentage of affected military employees living on-post
- Changes in local procurement, contracting, and purchases
- Definition of the multi-county region of influence (ROI)

In the case of the San Marcos realignment, no change in civilian or military strength in the region will occur, given the close proximity of the existing (combining) affected sites. The only exogenous economic stimulus will be associated with the construction of some 131,000 square feet of new facilities. This will involve some \$29 million dollars in construction expenditures and land acquisition.

An analysis of the San Marcos region indicates, based on the proximity and the road network, that the ROI for this analysis should include Caldwell, Hays, and Comal counties. The proposed site is centrally located between the Austin-Round Rock and San Antonio Metropolitan Statistical Areas (MSAs). Given this close proximity, both MSA counties (an additional 11 counties) could have been included, but this 3 county ROI is more realistic and will produce more conservative results. Use of the larger ROI would be sufficient to discount the effects of even larger projects.

The estimated inputs were used to produce EIFS reports (model results) for changes in total business volume, employment, income, and population. These are best shown as percentages (of the activity in the total ROI), and can be prepared to the RTVs for that variable in that ROI. The following EIFS documentation is provided; detailing the inputs, documenting projected changes, and evaluating the potential significance of the predicted change, based on the RTV technique:

Economic Impact Forecast System

EIFS REPORT

PROJECT NAME

San Marcos AFRC

STUDY AREA

48055 Caldwell, TX

48091 Comal, TX

48209 Hays, TX

FORECAST INPUT

Change In Local Expenditures	\$29,000,000
Change In Civilian Employment	0
Average Income of Affected Civilian	\$0
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Military Living On-post	0

FORECAST OUTPUT

Multiplier	2.34
Sales Volume - Direct	\$13,839,030

Sales Volume - Induced	\$18,544,300	
Sales Volume - Total	\$32,383,330	0.74%
Income - Direct	\$2,670,711	
Income - Induced	\$3,578,753	
Income - Total	\$6,249,464	0.16%
Employment - Direct	105	
Employment - Induced	140	
Employment - Total	245	0.28%
Local Population	0	
Local Off-base Population	0	0%

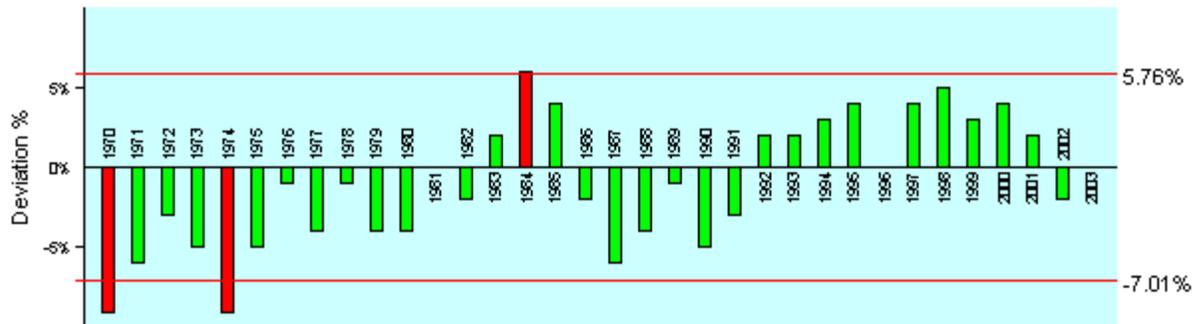
RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	5.76 %	5.71 %	4.48 %	2.86 %
Negative RTV	-7.01 %	-6.59 %	-5.94 %	-3.32 %

RTV DETAILED

SALES VOLUME

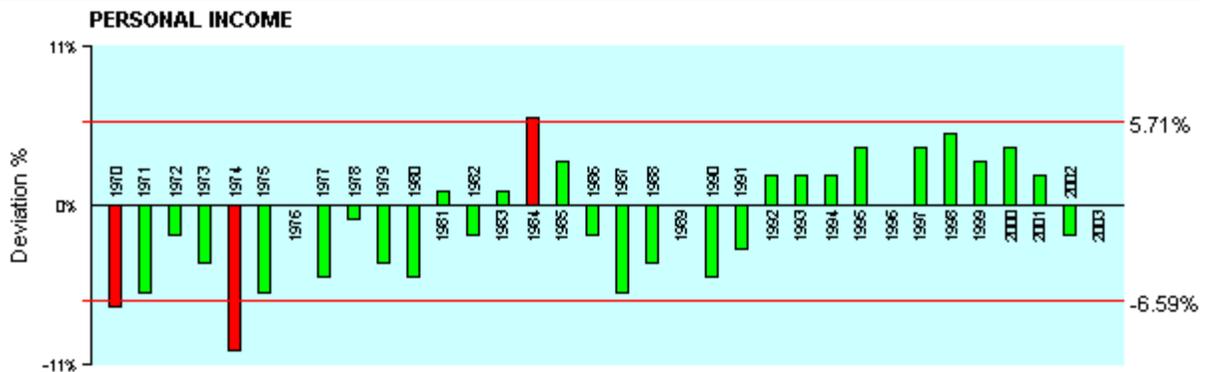
TOTAL BUSINESS VOLUME



Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	385532	2027898	0	-302895	0
1970	428000	2131440	103542	-199353	-9.35
1971	482978	2303805	172365	-130530	-5.67
1972	546270	2523767	219962	-82933	-3.29
1973	619924	2696669	172902	-129993	-4.82
1974	706344	2761805	65136	-237759	-8.61
1975	811712	2914046	152241	-150654	-5.17
1976	937148	3186303	272257	-30638	-0.96
1977	1055994	3368621	182318	-120577	-3.58
1978	1225238	3626704	258084	-44811	-1.24
1979	1415568	3765411	138706	-164189	-4.36

1980	1671488	3911282	145871	-157024	-4.01
1981	1986042	4230269	318988	16093	0.38
1982	2229218	4458436	228167	-74728	-1.68
1983	2499940	4849884	391448	88553	1.83
1984	2939724	5467887	618003	315108	5.76
1985	3323630	5982534	514647	211752	3.54
1986	3487546	6138081	155547	-147348	-2.4
1987	3581514	6088574	-49507	-352402	-5.79
1988	3786292	6171656	83082	-219813	-3.56
1989	4120330	6427715	256059	-46836	-0.73
1990	4303422	6412099	-15616	-318511	-4.97
1991	4580822	6504767	92668	-210227	-3.23
1992	5036458	6950312	445545	142650	2.05
1993	5535840	7418026	467714	164819	2.22
1994	6094636	7923027	505001	202106	2.55
1995	6767704	8594984	671957	369062	4.29
1996	7270652	8942902	347918	45023	0.5
1997	7996268	9595522	652620	349725	3.64
1998	8718888	10375477	779955	477060	4.6
1999	9484514	11002036	626560	323665	2.94
2000	10530416	11794066	792030	489135	4.15
2001	11272612	12287147	493081	190186	1.55
2002	11516600	12322762	35615	-267280	-2.17
2003	12027822	12629213	306451	3556	0.03

INCOME



Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	190981	1004560	0	-151614	0
1970	217821	1084749	80189	-71425	-6.58
1971	245156	1169394	84646	-66968	-5.73

1972	280661	1296654	127260	-24354	-1.88
1973	320555	1394414	97760	-53854	-3.86
1974	359984	1407537	13123	-138491	-9.84
1975	410348	1473149	65612	-86002	-5.84
1976	478366	1626444	153295	1681	0.1
1977	528633	1686339	59895	-91719	-5.44
1978	614449	1818769	132430	-19184	-1.05
1979	710108	1888887	70118	-81496	-4.31
1980	833821	1951141	62254	-89360	-4.58
1981	995481	2120375	169233	17619	0.83
1982	1118987	2237974	117599	-34015	-1.52
1983	1250305	2425592	187618	36004	1.48
1984	1469483	2733238	307647	156033	5.71
1985	1657586	2983655	250416	98802	3.31
1986	1741882	3065712	82058	-69556	-2.27
1987	1786304	3036717	-28996	-180610	-5.95
1988	1886622	3075194	38477	-113137	-3.68
1989	2059830	3213335	138141	-13473	-0.42
1990	2152370	3207031	-6304	-157918	-4.92
1991	2292507	3255360	48329	-103285	-3.17
1992	2524342	3483592	228232	76618	2.2
1993	2772370	3714976	231384	79770	2.15
1994	3047938	3962319	247344	95730	2.42
1995	3379491	4291954	329634	178020	4.15
1996	3622535	4455718	163764	12150	0.27
1997	3993538	4792246	336528	184914	3.86
1998	4351901	5178762	386517	234903	4.54
1999	4741868	5500567	321805	170191	3.09
2000	5260954	5892268	391702	240088	4.07
2001	5633361	6140363	248095	96481	1.57
2002	5760871	6164132	23768	-127846	-2.07
2003	6010535	6311062	146930	-4684	-0.07

EMPLOYMENT

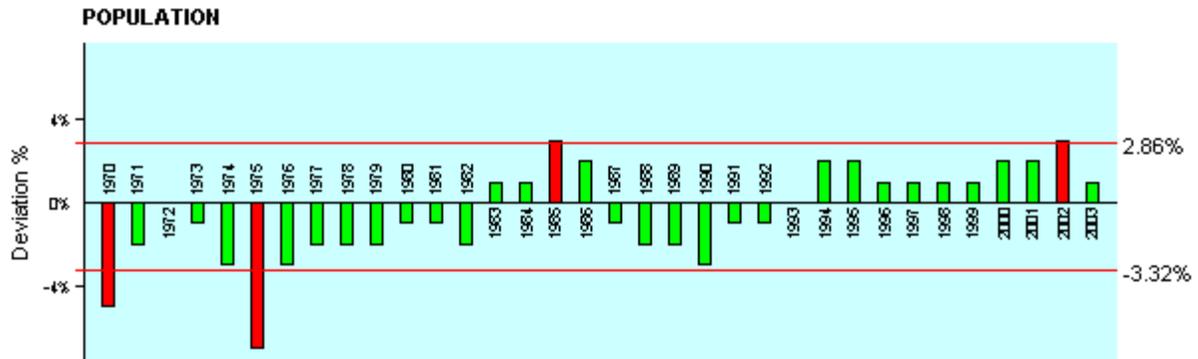
EMPLOYMENT



Year	Value	Change	Deviation	%Deviation
1969	27780	0	-2386	0
1970	27955	175	-2211	-7.91
1971	28964	1009	-1377	-4.75
1972	30221	1257	-1129	-3.74
1973	31149	928	-1458	-4.68
1974	30804	-345	-2731	-8.87
1975	31901	1097	-1289	-4.04
1976	33977	2076	-310	-0.91
1977	36358	2381	-5	-0.01
1978	38183	1825	-561	-1.47
1979	39409	1226	-1160	-2.94
1980	41158	1749	-637	-1.55
1981	43724	2566	180	0.41
1982	45470	1746	-640	-1.41
1983	46280	810	-1576	-3.41
1984	50038	3758	1372	2.74
1985	53727	3689	1303	2.43
1986	54085	358	-2028	-3.75
1987	57550	3465	1079	1.87
1988	57681	131	-2255	-3.91
1989	58280	599	-1787	-3.07
1990	59958	1678	-708	-1.18
1991	63623	3665	1279	2.01
1992	65927	2304	-82	-0.12
1993	70120	4193	1807	2.58
1994	73901	3781	1395	1.89
1995	79862	5961	3575	4.48
1996	83904	4042	1656	1.97
1997	88574	4670	2284	2.58

1998	94530	5956	3570	3.78
1999	99500	4970	2584	2.6
2000	102440	2940	554	0.54
2001	107159	4719	2333	2.18
2002	109290	2131	-255	-0.23
2003	111285	1995	-391	-0.35

POPULATION



Year	Value	Change	Deviation	%Deviation
1969	72597	0	-4761	0
1970	73457	860	-3901	-5.31
1971	76585	3128	-1633	-2.13
1972	81415	4830	69	0.08
1973	85517	4102	-659	-0.77
1974	87255	1738	-3023	-3.46
1975	86295	-960	-5721	-6.63
1976	88036	1741	-3020	-3.43
1977	90981	2945	-1816	-2
1978	94256	3275	-1486	-1.58
1979	97428	3172	-1589	-1.63
1980	101591	4163	-598	-0.59
1981	104949	3358	-1403	-1.34
1982	107097	2148	-2613	-2.44
1983	113006	5909	1148	1.02
1984	119475	6469	1708	1.43
1985	127895	8420	3659	2.86
1986	135924	8029	3268	2.4
1987	139731	3807	-954	-0.68
1988	141944	2213	-2548	-1.8
1989	143799	1855	-2906	-2.02

1990	143979	180	-4581	-3.18
1991	146699	2720	-2041	-1.39
1992	150403	3704	-1057	-0.7
1993	155209	4806	45	0.03
1994	162925	7716	2955	1.81
1995	171414	8489	3728	2.17
1996	178726	7312	2551	1.43
1997	186067	7341	2580	1.39
1998	193698	7631	2870	1.48
1999	201026	7328	2567	1.28
2000	210285	9259	4498	2.14
2001	220071	9786	5025	2.28
2002	230971	10900	6139	2.66
2003	239222	8251	3490	1.46

Summary of Results

The EIFS analyses indicated that the proposed action will produce no major socioeconomic effects in the ROI (community). The projected changes compare the appropriate RTVs as follows:

	<u>projected change</u>	<u>RTV</u>
Business (sales) volume	0.74%	5.76%
Income	0.16%	5.71%
Employment	0.28%	4.48%
Population	0.0%	2.86%

This significance determination is "conservative"--well within any errors produced through assumed EIFS input values. While these inputs could be refined, the results of the analysis (final determination) will certainly remain unchanged.

As this project involves the purchase of land from private sources, some local tax revenues will be reduced from the purchase and utilization by the government, which is tax exempt. The purchase price of this land is approximately \$316,000. Applying the published San Marcos composite property tax rate of 2.35% to this purchase price, this will yield a maximum reduction of \$7425 per year in tax revenues. This is significant overestimate of the lost tax revenues, as the "assessed value" of this property is less than the purchase price. This loss in tax revenue will be easily offset by the exogenous influx of construction expenditures during the 2-3 years of the construction phase of the proposed action and the indicated multiplier affect. While development of the property

for other commercial or non-government uses would produce additional revenues, such development is speculative and cannot be ascertained without more specific information.

