Working Draft

FINDING OF NO SIGNIFICANT IMPACT (FNSI)
and
FINDING OF NO PRACTICABLE ALTERNATIVE (FNPA)
for
FORT SAM HOUSTON MASTER PLANNING ACTIONS
ENVIRONMENTAL ASSESSEMENT
SAN ANTONIO, TEXAS

AGENCY:

Fort Sam Houston Army Post, San Antonio, Texas.

SUMMARY:

TEC Inc. (TEC) has prepared an Environmental Assessment (EA) for the U.S. Army at Fort Sam Houston (FSH) that analyzed Master Planning construction, repair, and rehabilitation projects at the FSH Army Post. Based on the following summary of potential effects, and as discussed in the accompanying EA, the Commander has determined that the preferred means of accomplishing the Proposed Action (the Master Planning Actions Alternative) is not a major federal action significantly affecting the quality of the human environment, within the meaning of the National Environmental Policy Act (NEPA) of 1969. Therefore, preparation of an Environmental Impact Statement (EIS) is not required.

INTRODUCTION:

TEC prepared an EA for FSH in accordance with NEPA, 32 CFR Part 651. The EA describes the potential environmental consequences resulting from Master Planning Actions (Proposed Action) and No-Action Alternative. The EA analyzes a scope of 30 proposed master planning facility and infrastructure construction, repair, and renovation projects at FSH. Types of actions proposed include: new facility construction; road widening, extension, and realignment; storm water drainage system repairs; existing facility renovations and expansion; and bridge construction.

BACKGROUND:

FSH is located in the City of San Antonio, Texas, approximately 1 mile northeast of downtown San Antonio. Located within the Interstate 410 beltway, FSH is surrounded by highly urbanized development. The 2,940 acre installation is surrounded by developed property and widely used highways and arterial roads. There is no room for land expansion, so additional development is confined within the installation's borders. FSH serves as the Army's premier medical training, care, and research complex.

PROPOSED ACTION:

The Proposed Action is to implement various master planning facility and infrastructure construction, repair, and renovation projects at FSH. The purpose of the Proposed Action is to meet changing mission support requirements at FSH. The Proposed Action is needed to maintain FSH as an installation that provides world-class medical training, care, and research, and supports headquarters and administrative missions. Implementation of the Proposed Action would accommodate anticipated population, material, and mission growth actions at FSH resulting from various Department of Defense (DoD) and Army stationing initiatives to modernize, upgrade, expand, and replace facilities on FSH.

The Proposed Action includes the following elements as described in the FSH Master Planning Actions EA. Proposed site locations are also indicated in the EA. Minor siting variations for construction projects may occur within the development footprints:

- Demolish Building 197
- Construct the MacArthur Field Running Track
- Expand and renovate the Historic Theatre, Building 2270
- Construct Installation Management Command (IMCOM) Headquarters (HQ) and associated parking
- Construct Medical Education and Training Campus (METC) parking lot
- Realign Stanley Road between Reynolds Road and New Braunfels Avenue
- Realign Reynolds Road and Widen Scott Road
- Construct the Sixth Army Command and Control Facility
- Construct the Sixth Army Special Troops Command and Control Facility
- Construct the Fifth Army Special Purpose Facility
- Battle Command Training Center Phase II
- Construct an Unaccompanied Personnel Housing (UPH) Permanent Party (PP) building
- Construct a Medical Logistics Company (MED LOG CO) Tactical Equipment Maintenance Facility (TEMF) with Company Operations Facility (COF)
- Drainage system improvements, Scott Road and Wilson Street
- Drainage system improvements, Buildings 2248-2250
- Demolish Chapel Building 1398
- Demolish and replace recreation center Building 1462
- Construct TEMF area development
- Construct 470th Military Intelligence (MI) Brigade (BDE) HQ complex
- Realign and extend Schofield Road
- Construct a Training Aids Center
- Drainage improvements, Patch Road
- Construct the Schofield Road Access Control Point (ACP)
- Construct the 91 W Applied Instruction Building (AIB)
- Construct Chapel
- Construct a student trainee adult sports park
- Drainage system improvements, Winans Road and Nursery Road
- Drainage system improvements, Brooke Army Medical Center (BAMC)

OTHER ALTERNATIVES CONSIDERED:

A fundamental principle of NEPA is that an agency should consider reasonable alternatives to a proposed action. Considering alternatives helps avoid unnecessary impacts and allows an analysis of reasonable ways to achieve a stated purpose. To warrant detailed evaluation, an alternative must be reasonable. To be considered reasonable, an alternative must be "ready" for decision-making, affordable, capable of implementation, and able to meet an action's purpose and need.

FSH has excluded from analysis potential alternative(s) that would not satisfy all of the screening criteria identified in the EA because they would not be reasonable alternatives. As the EA illustrates, no alternative to the Proposed Action would satisfy the screening criteria, largely because additional development opportunities on FSH are extremely limited due to existing dense development and site constraints such as floodplains, historic properties, and security considerations. These existing conditions effectively eliminate the possibility of generating detailed siting alternatives to the Proposed Action that would meet mission requirements and could be developed physically. Because the Post could not identify any reasonable alternatives to the Proposed Action, the EA examined only the Proposed Action and the No-Action Alternatives.

ENVIRONMENTAL IMPACTS OF PREFERRED AND NO-ACTION ALTERNATIVES:

The EA analysis found that with implementation of the following best management practices (BMPs) and potential conservation measures, the Proposed Action would not have any unavoidable significant environmental impacts.

Regulatory Requirements and Best Management Practices

- The design of all new construction would be consistent with the IDG.
- Construction BMPs would be implemented to moderate the spread of fugitive dust (e.g. watering exposed soils, soil stockpiling, and soil stabilization).
- Construction engineering measures and BMPs would be implemented to reduce the potential storm water runoff and erosion of soils due to an increase in impervious surfaces (e.g. grading and reseeding the land upon completion of construction).
- Potential impacts from highly corrosive and high shrink-well soils would be prevented with the use of established engineering BMPs.
- Construction BMPs would be implemented to reduce the increase of pollution into Salado Creek potentially resulting from the construction activities.
- A Storm Water Pollution Prevention Plan (SWPPP) would be implemented during construction to minimize any potential impacts to sensitive water resources.
- The construction of the Salado Creek Crossing could temporarily impact 0.18 acres of fish and wildlife habitat in Salado Creek and its floodplain. There is potential habitat within the proposed Salado Creek Crossing for migratory birds to nest. If an active bird nest is encountered during construction, it would be avoided.
- As practicable, roadway construction work and construction on Salado Creek Crossing would not occur during peak traffic times to minimize the impact on traffic flows.
- Prior to any demolition, the construction contractor would ensure that demolition would not damage existing utility infrastructure (e.g. buried pipes or power lines).

- All of the storm water drainage improvement projects have the potential to significantly impact utilities during the construction phase, especially if there are utility crossings at the construction point. The construction contractor would review all pre-existing utilities in the area to ensure that any interruption of service is limited and for as brief a time as possible.
- For the handling of hazardous materials needed for construction, the construction contractor would comply with all applicable permits and use standard BMPs designed specifically to minimize the risk of environmental contamination and harm to human health. The construction contractor would implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan during construction, as applicable, given the volumes of petroleum products on site. The construction contractor would comply with Phase I and II Storm Water regulations under the Federal Clean Water Act to prevent exposure of storm water runoff to construction materials or sediment.
- Hazardous wastes would be handled in accordance with applicable Army regulations and the FSH Oil and Hazardous Substances Emergency Contingency Plan. If an unknown or unidentified waste, such as contaminated soil, is encountered during construction, all construction in the area would stop and the appropriate installation personnel would be notified.
- Undocumented USTs or pipelines may be encountered during ground disturbance activities. These items may contain products which are hazardous to the environment or human health. If they are encountered during construction, all construction in the area would stop and the appropriate installation personnel would be notified.
- Prior to any building renovation or demolition on a building construction prior to 1985, a complete asbestos survey would be completed. When removal of ACM is required, the construction contractor would follow industry and Army standards for the encapsulation, removal, and disposal of ACM.
- Prior to any building renovation or demolition, a complete LBP survey would be completed. When removal of LBP is required, FSH would follow industry and Army standards for the encapsulation, removal, and disposal of LBP. Buildings 890, 910 -914, 961,1222, 1278, 1279, 1281, 1290, 1105, 1111, 1462, 2263, 2264, 2266, 2270, 4168, and 4197 would require a LBP survey.
- Buildings 890, 910-914, 961, 1222, 1278, 1279, 1281, 1290, 1105, 1111, 1462, 2263, 2264, 2266, 2270, 4168, and 4197 would also require a PCB survey or inspection to ensure that no PCB-containing materials would be impacted.
- Due to the age of the installation and its historic uses, not all UXO may be accounted for. If UXO are encountered during site development, U.S. Army EOD support personnel would assess and eliminate any potential explosive hazard prior to resuming construction activities.
- The proposed site of the Training Aids Center would be adjacent to the Conservation visual zone. The size of the building may be sufficient to impact the Conservation visual zone. Therefore, the Training Aids Center would be designed to minimize visual impacts to the Conservation visual zone.
- The MacArthur Field Track would be constructed of materials that do not adversely affect the drainage system.
- To avoid or minimize potential impacts to utilities during construction, the construction contractor would review all pre-existing utilities in this area to ensure that any interruption in service is limited to those times when it is necessary and for as brief a time as possible. If necessary, portable power would be provided to signal lights.
- The Student Trainee Adult Sports Park construction would represent a loss of pervious surfaces within the floodplain, which may impact the storm water drainage system. Any potential adverse impact may be avoided by incorporating design elements to mitigate this impact through the use of pervious track and field surfaces, improved building drainage, and the use of culverts and other such

engineering solutions to disperse storm water. Additionally, the recreational fields may require additional irrigation services. The construction contractor would review the water usage to determine if additional recycled water can be purchased for irrigation.

Potential Conservation Measures

Floodplain Development and Wetlands

Three proposed Master Planning Actions would occur in the Salado Creek floodplain and in areas where wetlands are present: Salado Creek Crossing, the Student Trainee Adult Sports Park, and the Schofield Road ACP. The final designs of the Salado Creek Crossing, Schofield Road ACP, and Student Trainee Adult Sports Park would avoid wetlands to the maximum extent practicable. If final designs cannot avoid jurisdictional wetlands or waters of the U.S., then mechanical excavation or the placement of fill material in wetlands or other waters of the U.S. would require a Clean Water Act Section 404 permit and Section 401 State Water Quality Certification. The limits of jurisdictional waters with respect to potential construction footprints would need to be determined prior to final designs. As conditions of the Clean Water Act permit, final project designs would be required to minimize impacts as much as practicable, to restore temporarily impacted areas, and to provide compensatory mitigation for any loss of wetland function if a delineated wetland is actually disturbed. BMPs and potential conservation measures including minimizing extent of fill and construction equipment through site specific design, limiting construction staging to upland areas, and maintaining natural drainage patterns, would be used to minimize impacts to wetlands. Pursuant to EOs 11988 and 11990, the Army would take all practicable measures to minimize potential harm to or within the floodplain and wetlands as described above. Additional features to facilitate drainage at the site (culverts, roadside ditches) may be required and would be incorporated during site design and layout. The cumulative effect of the proposed development would not create an obstruction to the floodplain, increase the water surface elevation of the base flood, or increase the flood heights or velocities associated with Salado Creek.

Cultural Resources

Building 197

The proposed demolition of Building 197 would be a direct, adverse impact to a building that is both NRHP-eligible and a contributing element to an NHLD. The preparation of Historic American Building Survey/Historic American Engineering Survey (HABS/HAER) document would lessen the impact to this historic structure. While the building would be demolished, the HABS/HAER documentation would serve to record it for posterity. Additionally, the HABS/HAER document would serve as an informational document detailing the building's history and importance to the landscape of the NHLD.

DOCUMENT AVAILABILITY:

[To be completed with Final FNSI]

FINDINGS:

Finding of No Practicable Alternative

As the Salado Creek crossing, the Schofield Road ACP, and the Adult Sports Park Proposed Actions are within or in close proximity to the Salado Creek floodplain, other than the No-Action Alternative, no practicable alternative exists to entirely avoid the floodplain because no alternative sites are available that could perform the same function given the location of the activity and the geography. BMPs and potential conservation measures would be used to minimize impacts.

Based upon pertinent considerations discussed herein, the Army hereby finds that there are no practicable alternatives to the Proposed Action at Fort Sam Houston. Furthermore, pursuant to Executive Orders 11988 and 11990, the Army will take all practicable measures to minimize potential harm to or within the floodplain and wetlands at Salado Creek Crossing, the Schofield Road ACP, and the Adult Sports Park.

Finding of No Significant Impact

With implementation of the aforementioned BMPs and potential conservation measures, the Master Planning Actions Alternative would have no significant impacts on environmental resources.

APPROVED BY:

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Mary E. Garr Date
COL U.S. Army
Garrison Commander