

ENVIRONMENTAL ASSESSMENT

*Construction of New Evergreen School at
Lewis Main, Joint Base Lewis-McChord, Washington*

National Environmental Policy Act (NEPA)
Documentation prepared by the Environmental Division
Public Works, Joint Base Lewis-McChord

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Acronyms

AICUZ	Air Installation Compatible Use Zone Study
ATFP	Antiterrorism Force Protection
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulation
CPSD	Clover Park School District
DA	Department of the Army
DPW	Department of Public Works
EA	Environmental Assessment
ERP/CC	Environmental Restoration Program/Compliance Cleanup
FMP	Forest Management Plan
FNSI	Finding of No Significant Impact
INRMP	Integrated Natural Resources Management Plan
I-5	Interstate-5
JBLM	Joint Base Lewis-McChord
LUC	Land Use Control
MAMC	Madigan Army Medical Center
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination Permit
NPL	National Priorities List
OEA	Department of Defense, Office of Economic Adjustment
SF	Square Feet
SWPPP	Stormwater Pollution Prevention Plan
WHPA	Wellhead Protection Area

INTRODUCTION

The Department of Army is currently conducting a review of Clover Park School District's (CPSD) proposal to construct a new Evergreen Elementary School on Lewis Main, Joint Base Lewis-McChord (JBLM). The existing school was built in 1990 and is located at 9010 Blaine Avenue, JBLM. CPSD is seeking grant funding from the U.S. Department of Defense's Office of Economic Adjustment (OEA) for the purpose of constructing a more user friendly facility across the street.

If awarded the grant, CPSD will manage the construction of the new school. Funding from the OEA grants will be supplemented with partial matching funding from CPSD or state school construction assistance program. Funding for the grant is provided under the Department's Public Schools on Military Installations Program. Under the program, priority consideration is given to those military installations with schools having the most serious capacity or facility condition deficiencies. A new facility would allow CPSD students to continue to receive a quality education in a state-of-the-art building relevant to today's educational needs.

Location and Background

The current school is located towards the northeast corner of Lewis Main, JBLM and is one of six (6) CPSD elementary schools on the installation. Lewis Main is located in Pierce County, Washington and is neighbored by the City of Lakewood to the north, Parkland (unincorporated) to the east, and the City of DuPont to the west.

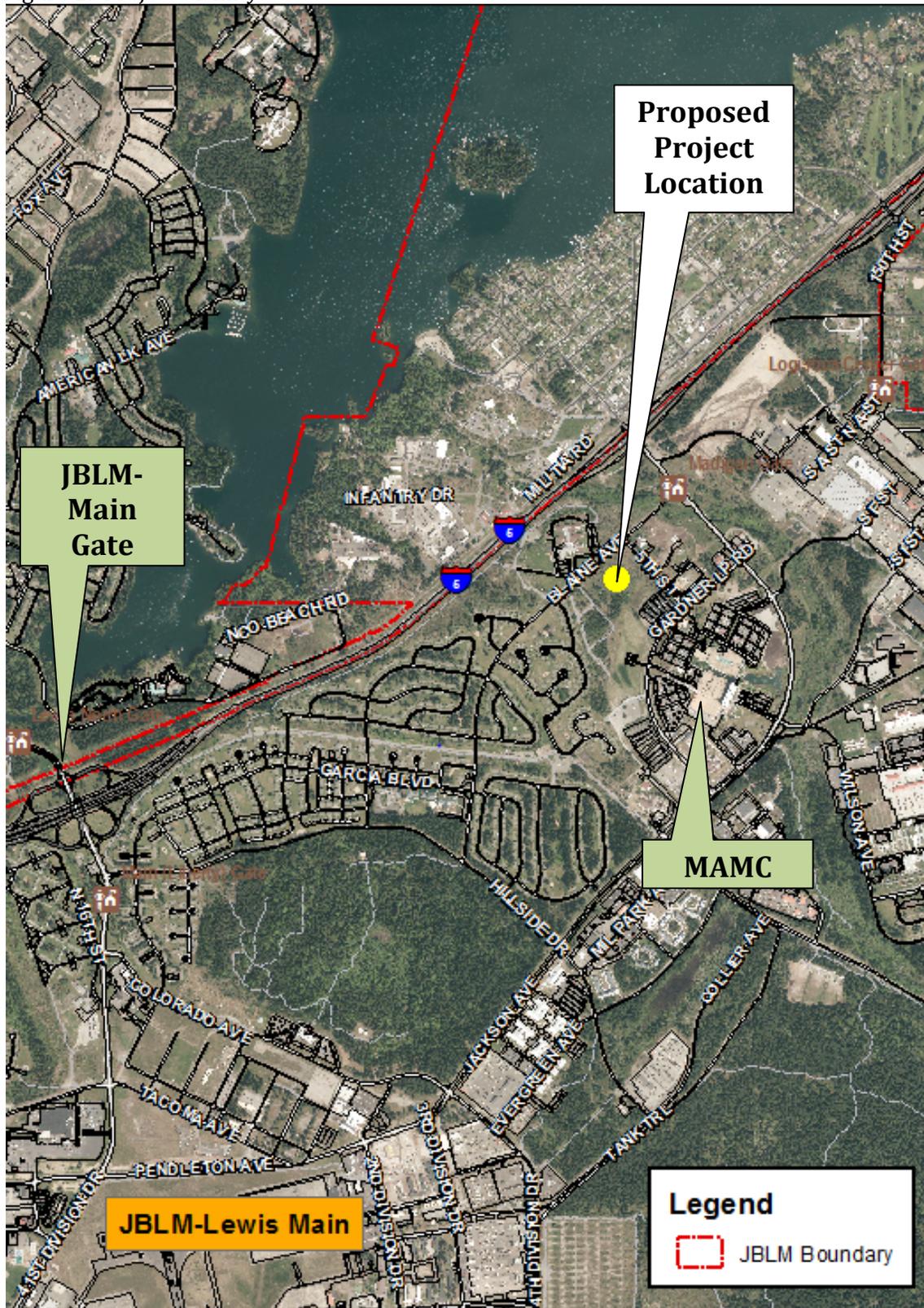
The site proposed for construction of the new elementary school is immediately to the southeast of the current school and immediately northwest of an area called "Gardner Loop". To the northwest, the proposed site is bordered by Blaine Avenue and to the northeast by 5th Street. Land uses surrounding the proposed site included a parking lot and helipad for Madigan Army Medical Center to the southeast, an undeveloped parcel and residential housing area to the southwest, the current school and the Prairie Oak Preserve to the northwest, and government medical buildings to the northeast.

Purpose and Need

The purpose of the proposed action is to authorize a lease that will allow CPSD to construct a new state-of-the-art elementary school that will adequately serve the appropriate student population of the Evergreen Housing Area and surrounding communities at JBLM.

Clover Park School District has stated that the project is needed because the current building lacks required areas essential to current school programming and has ongoing mechanical issues that make it infeasible to remodel.

Figure 1: Project Vicinity



(J. Howard, JBLM- GIS Aerial database, August 16, 2013)

Scope of the Analysis

The scope of this document is to analyze the potential environmental effects of the proposed construction and operation of the new Evergreen Elementary School. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA); the regulations issued by the Council on Environmental Quality (CEQ), 40 Code of Federal Regulation (CFR) Part 1500-1508; and the Army's implementing procedures published in 32 CFR 651, *Environmental Analysis of Army Actions*.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Section 102(2)(E) of NEPA states that Agencies shall study, develop, and describe appropriate alternatives for any proposal which involves conflicts concerning alternative uses of available resources. Alternatives include the proposed action, the no action alternative, and any reasonable alternatives to the proposed action that can be realistically accomplished.

To be considered a reasonable alternative, the action must meet the projects purpose and need. In addition, the proposed action and/or alternatives must also be located within the installation boundaries and consider the impact to natural resources and surrounding land uses.

Proposed Action

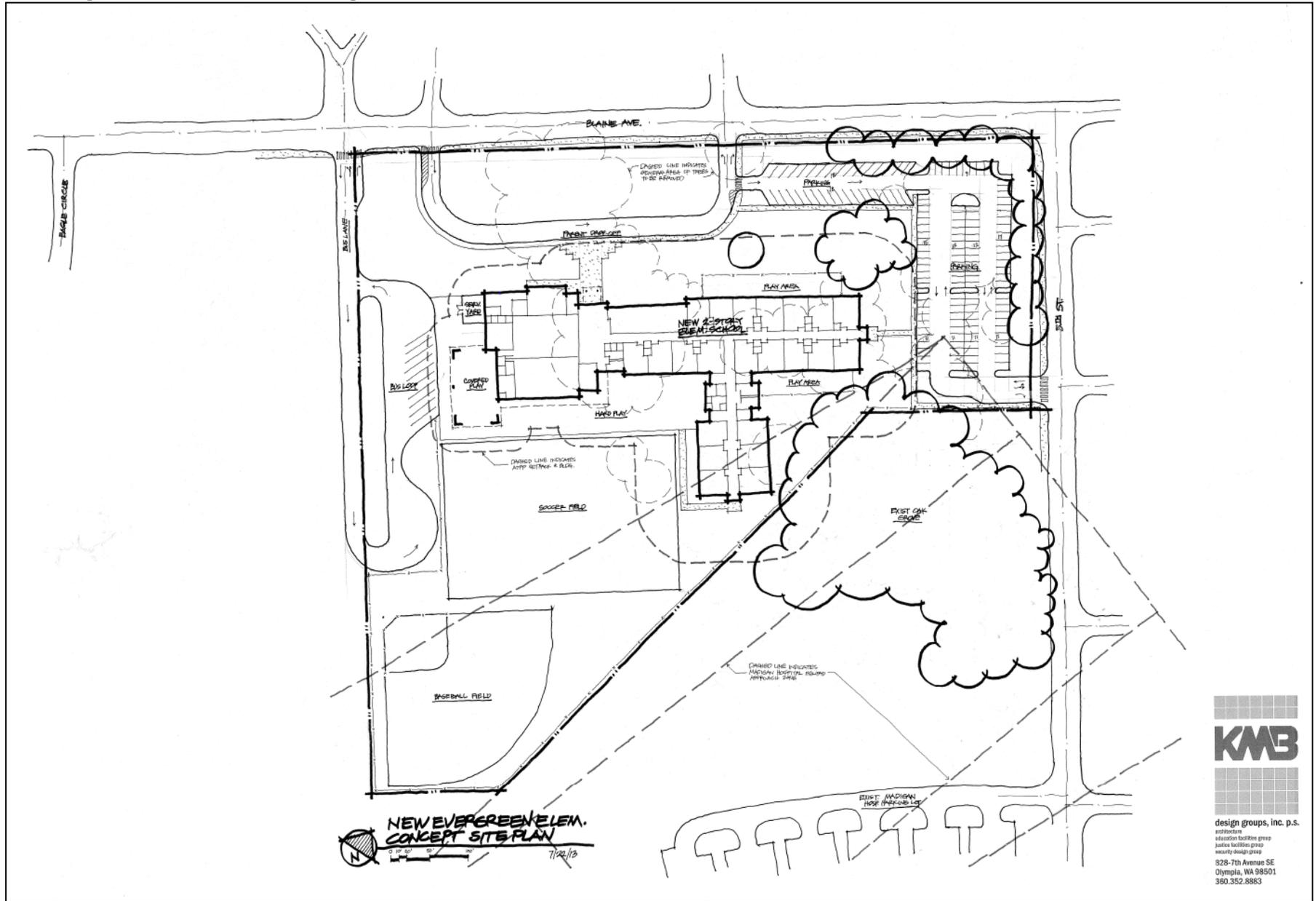
The Proposed Action would construct a new Evergreen Elementary school across from the existing school site. The project site was identified due to its proximity to the Evergreen Housing Area and the other communities it serves. In addition, the project location has minimal impacts to natural resources and existing facilities, which excluded other potential project locations in the immediate area.

Under the Proposed Action, the Army would enter into a long-term lease with CPSD. The lease would be for a term of twenty-five (25) years, and would authorize CPSD to move forward with their proposed construction of the site. CPSD's proposal would clear and grade approximately 12.2 acres of undeveloped land, and would construct a facility that will include the following features:

Main School Building (2 stories, ~100,000 SF)	Vehicle Parking Lot
Points of ingress/egress (to/from parking lots)	Fencing
Bus Lot	Baseball Field/ Soccer Field
Parent Drop-off Area	Stormwater structures
Crosswalks & Sidewalks	School/traffic lights (if necessary)
Play Areas (covered, hard, and other)	

The design for the proposed facilities will attempt to comply with JBLM's Master Plan Guidelines for schools. The orientation of the main building will be focused towards the street frontage and will have a strong entry presence. Select site features, such as parent drop-off, bus and vehicle parking, and setbacks are in line with Antiterrorism Force Protection (ATFP) restrictions. Also, the two-story main school building is expected to comply with height restrictions for the nearby Madigan Army Medical Center helicopter approach zone (HAZ). Construction would likely include improvements on Blaine Avenue such as school/traffic lights and signage.

Figure 2: Proposed Site Plan for New Evergreen School*.



(US Army, Directorate of Emergency Services, (<http://www.army.mil/media/162819/>)

*The above site plan is an initial draft proposal. Plan and layout of proposed school and facilities is expected to change, especially with regards to minimizing impacts to Oregon white oaks at northeastern corner of the drawing.

No Action Alternative

The No Action Alternative serves as the baseline from which to compare all other reasonable alternatives and is not analyzed as a viable option with which to accomplish the proposed action. Under the No Action Alternative, CPSD would continue to use the current Evergreen Elementary School for its intended purpose.

Alternatives Ruled Out From Detailed Analysis

At least one alternative project location and/or project option was developed and reviewed in development of this project. The following alternative did not sufficiently meet the screening criteria to achieve the purpose and need for this action and have therefore been ruled out for further detailed analysis.

DEMOLISHING CURRENT EVERGREEN SCHOOL AND RECONSTRUCTING FACILITIES ON THE SAME SITE

This alternative was discontinued from further consideration. The current building is owned by the Department of the Army which wants to maintain it for possible reuse such that it is unavailable for demolition. Also, the current building has mechanical issues which make it impractical to remodel.

AFFECTED ENVIRONMENT

The affected environment reviews the environmental setting or general environmental conditions of the proposed project area. It describes the environmental baseline against which the environmental effects can be evaluated. Throughout scoping of this project, specific resource areas were identified that may be affected by the proposed action, including: environmental restoration, biological resources, and stormwater concerns.

Several resource areas are not expected to be impacted by the proposed action or alternatives and have been eliminated from further analysis in this environmental assessment (EA). The rationale for their exclusion is outlined in the table below.

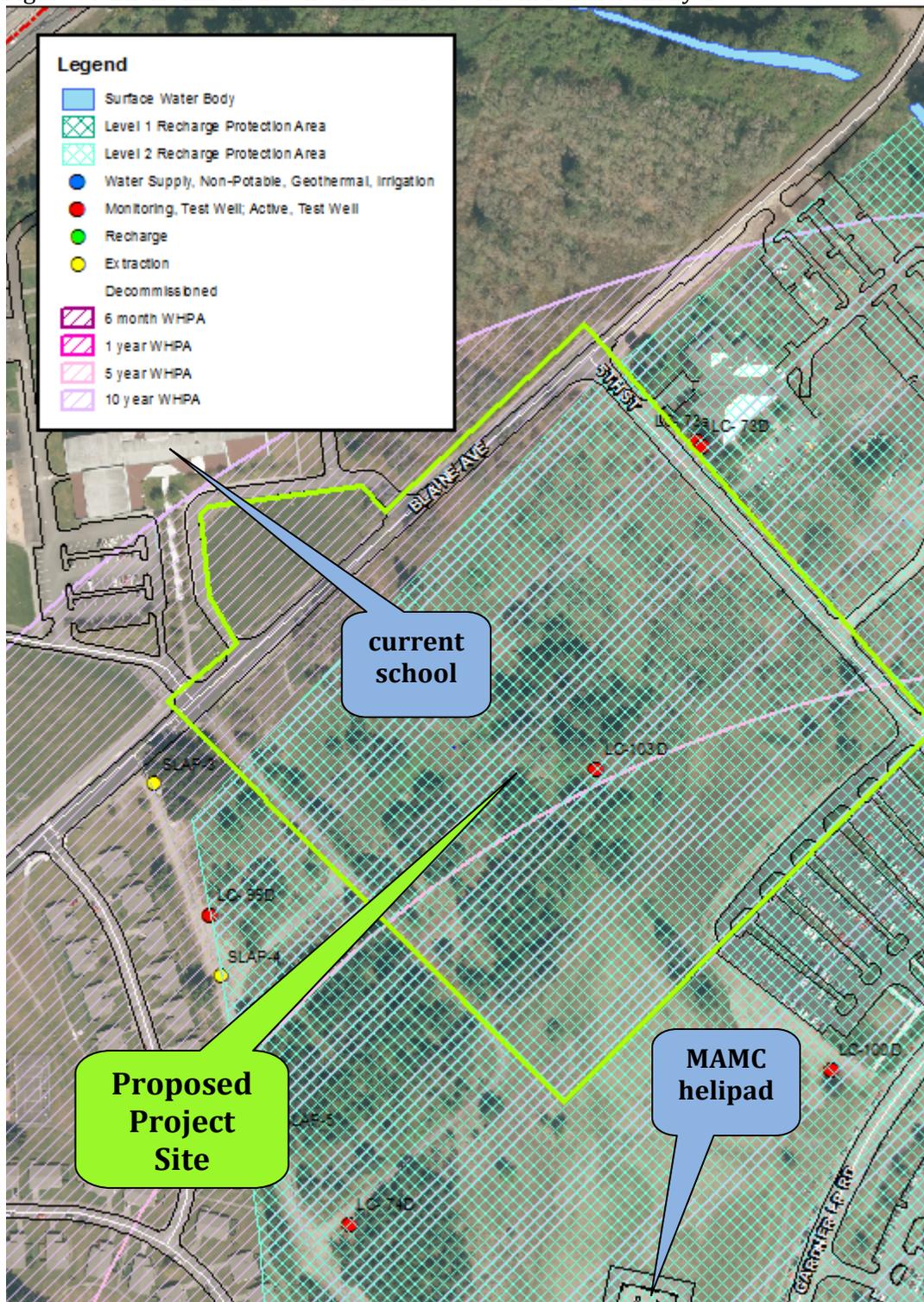
Table 1: Resources Excluded from Further Analysis

Resource Area	Reason for Dismissal
Land Use	Surrounding land use in the vicinity of the proposed action includes the current school, open space, residential, Madigan Army Medical Center, and government health related sites (i.e. Public Health Command, Preventative Medicine Site, etc.). Per the JBLM Planning Department, the targeted parcel is zoned as "Campus". The implementation of the proposed action or alternatives is consistent with designated land use and would not impact future development within the project area, and therefore is not considered further within this document.
Traffic	During construction, some short-term disruption to traffic to and from the current school, nearby residential areas and businesses may occur, but is expected to be minimal. Most work will occur on-site and will not impact surrounding roadways. Once the project is completed, no discernible effects to traffic would be expected. The proposed site is immediately adjacent to the current school such that no increases are expected in population and/or services, as a result of this proposed action, which would increase traffic.

<p>Environmental Restoration</p>	<p>The proposed construction site lies above the JBLM Logistics Center groundwater (e.g. aquifer) plume, which is on the National Priorities List (NPL). Currently, there is a Federal Facility Agreement (FFA) between the EPA, the Washington State Department of Ecology, and JBLM documenting monitoring and response actions for the Logistics site. Per JBLM Environmental Restoration Program/Compliance Cleanup (ERP/CC) program contacts clearing, excavation, and construction activities for the purpose of building the new school would occur at or close to the ground surface and would likely have no impact to the Logistics Center plume which is located approximately 150 feet below the surface.</p> <p>In addition, one ERP/CC monitoring well (no. LC-103D, for the Logistics groundwater plume; see Figure 3) is located in the central, southeast portion of the property while others (both active and decommissioned) are located off but nearby the property. CPSD will coordinate with the JBLM ERP/CC program lead, regarding the specific location and measures to take to protect LC-103D. In general, monitoring wells should be clearly marked such that construction activities do not damage them. If any grading or filling is being done, it may be necessary to hire a well driller licensed in Washington to extend the well casing to the new ground surface.</p>
<p>Drinking Water</p>	<p>The southern corner and southeastern edge of the proposed site is within the five (5) year Wellhead Protection Area for JBLM drinking water well MAMC4. The balance of the site is within the 10 year Wellhead Protection Area for the same well. In accordance with applicable regulations, no sources of contamination shall be constructed, stored, disposed of, or applied within the sanitary control area without JBLM- Water Program and/or water purveyor approval. The proposed construction does not include the introduction of any hazardous waste or pollution, and is not expected to impact drinking water at surrounding sites.</p>
<p>Air Quality</p>	<p>The potential for impacts to air quality resulting from construction as well as long term operation of the school are considered negligible. JBLM's air quality is classified as good and is in attainment with the National Air Quality Standards (Fort Lewis DPW, 2010). Appropriate Best Management Practices (BMPs) are recommended to be employed during construction to minimize short-term, minor air quality impacts. For example, dust or uncovered soil can be suppressed with water as long as doing so does not create a wastewater discharge. Additionally, dust-generating piles of soil can be covered with wind-impervious fabric, plastic, fabric, mulch, or other functional materials. This project is not expected to have an impact to automobile emissions since it will neither add nor remove vehicles from the roadways over the long term.</p>
<p>Cultural Resources</p>	<p>No archeological, tribal, or historic resources are known to occur on the site such that implementation of the proposed action is not expected to impact any cultural resources.</p>
<p>Socioeconomic Resources and Environmental Justice</p>	<p>Implementation of the proposed action would have no effect to socioeconomic conditions, including off-installation minority and low-income populations. All project alternatives, including the proposed action would occur within JBLM property boundaries and would not negatively impact neighboring areas outside of the installation.</p>
<p>Hazardous Materials and Waste</p>	<p>Low levels of hazardous wastes are expected to be generated as a result of construction activities (i.e. paint wastes). Also, during a site visit, some materials appear to have been illegally dumped at the site. If any hazardous wastes or materials are found or generated (i.e. from a spill clean-up during construction), CPSD is recommended to coordinate with JBLM's Environmental Division to determine appropriate protocols regarding potential sampling, profiling, etc. No impacts to Hazardous Materials and Wastes are expected at the proposed site.</p>

Noise	<p>The northwestern edge of the proposed facility will lie approximately 1,200 feet from the northbound lanes of Interstate-5. The southern edge of the proposed site also lies approximately 1,000 feet from the Madigan Army Medical Center helipad. To minimize noise related distractions to students and faculty, mitigations should be considered by CPSD during project design.</p> <p>Due to its proximity to Interstate 5 (I-5; approximately 300-350 feet away), the current school is located in the “normally unacceptable” noise zone for noise sensitive land uses. With the new proposed site being farther away from I-5 (approximately 1,200 feet away), the new school is expected to be in the “acceptable” land use category (see referenced “Noise Assessment No. 52-34-0437-89). Because of this, impact to noise was considered discountable for this proposed action. Nevertheless, CPSD is advised to consult with the JBLM Master Planning Office to determine if and which select strategies and/or structures, such as earthen and tree barriers or heavy insulation (i.e. incorporated as part of design/construction plans), should be employed to minimize potentially adverse noise levels.</p>
Airspace	<p>The proposed action will have no affect on airspace at the installation. Nevertheless, CPSD should confirm that the specific proposed designed site plan for the new school is in full compliance with all regulations pertaining to operations of the nearby MAMC’s helicopter pad (i.e. see JBLM’s 2013 Air Installation Compatible Use Zone Study [AICUZ] and accident potential, electromagnetic interference, light emissions, and related issues).</p>

Figure 3: Environmental Concerns Excluded from Further Analysis



(J. Howard, 2010 Aerial JBLM GIS Database, September 5, 2013)

*NOTE: Though not shown in Figure 3, the area of the proposed school lies above, in part, the NPL Logistics site. Also, "Level 1 (and 2) Recharge Protection Area" as shown in the Legend refers to a LUC related to Murray Creek. See Table 1 for details.

AFFECTED ENVIRONMENT ENVIRONMENTAL CONSEQUENCES

This section discusses the affected environment and the environmental consequences that are expected to occur as a result of the proposed action. The degree to which environmental resources are affected is based on significance criteria specific to each resource, as well as the time (long-term or short-term) and place (local or regional) that the proposed action would occur. The spatial parameters defined for individual activities are also known as the region of influence.

Biological Resources

Oregon White Oak & Surrounding Habitat

High quality, Oregon white oak habitat is located within the proposed site location (see Figure 4). Oregon white oaks are considered a priority habitat within Washington State and also have special management status within the JBLM's Integrated Natural Resources Management Plan (INRMP). Open space within the project area also likely contains coniferous species such as Douglas fir, western red cedar, and western hemlock. White oaks have been identified for protection within JBLM because of the habitat that they provide to many State-listed wildlife species, including the Western gray squirrel. In addition to squirrels, these forested habitats provide habitat to many local species such as rodents, raccoons, and black tailed deer. Bird species including bald and golden eagles and several species of migratory birds also populate these forests habitats.

PROPOSED ACTION

Clover Park School Districts proposal to construct a new Evergreen Elementary school is expected to have moderate adverse impact to Oregon white oak and forested habitat at JBLM. The proposed construction will clear approximately 13 acres of a previously undeveloped site. The impacts to Oregon white oak are not expected to be significant because of mitigations that have been built into the project. CPSD proposal will minimize impacts to oaks through revised project design (modification of the project drawings to preserve the northeast patch of habitat). In addition, CPSD will mitigate the site by planting (6) 2-inch caliper balled Oregon white oak trees for every one (1) mature tree removed within the construction footprint. In addition, special consideration may be needed for "landmark" oak trees. Landmark trees are defined as having a single trunk minimum measurement of 24 inches diameter at breast height or for multi-trunk trees a minimum measurement of 30 inches diameter at breast height. The goal is to design the school around these landmark trees, so they can be retained on-site. All mitigation will be coordinated with the JBLM Fish & Wildlife Program Manager. The proposed action is expected have *adverse impacts* to Oregon white oak and surrounding habitat. These impacts are *not expected to be significant* because of the mitigations that have been included in the proposed action.

NO ACTION ALTERNATIVE

Under the No Action Alternative there would be *no impact* to Oregon white oak and the surrounding habitat. Vegetation and the existing open space would remain undeveloped.

Invasive Plant Removal & Disposal

Localized stands of Scotch broom and Himalayan blackberry bushes exist within the proposed site. Both plant types are well known invasive and pervasive species. Removal and disposal of species needs to be conducted in a manner that does not perpetuate the spread of these species. Actions that would propagate the spread of these species was considered an adverse impact to biological resources. JBLM's Forest Management Plan states that Scotch broom" may be removed by mowing,

hand cutting, spraying or prescribed burning. Herbicides are also frequently used and are considered effective.

PROPOSED ACTION

The proposed action is expected to have a *negligible effect* on invasive species. Proper removal and disposal of invasive plant species will be coordinated with JBLM Forestry and/or Fish and Wildlife Program staff. If herbicides will be used, all herbicide application will be overseen by a person with a Federal or State certified pesticide applicator license and will be conducted in accordance with the JBLM's Integrated Pest Management Plan. Impact to invasive plants is considered *less than significant*.

NO ACTION ALTERNATIVE

Under the No Action Alternative there would be *no impact* to invasive species. Existing invasives will remain on the location of the proposed project site.

Water Resources

The JBLM stormwater drainage system accommodates most of the developed areas of Lewis Main, including the proposed project site. Stormwater at the existing, as well as the proposed Evergreen Elementary school site infiltrates on site or drains to Murray Creek which is located just to the northeast. The majority of the proposed project location falls within the Recharge Protection Area for the Creek.

PROPOSED ACTION

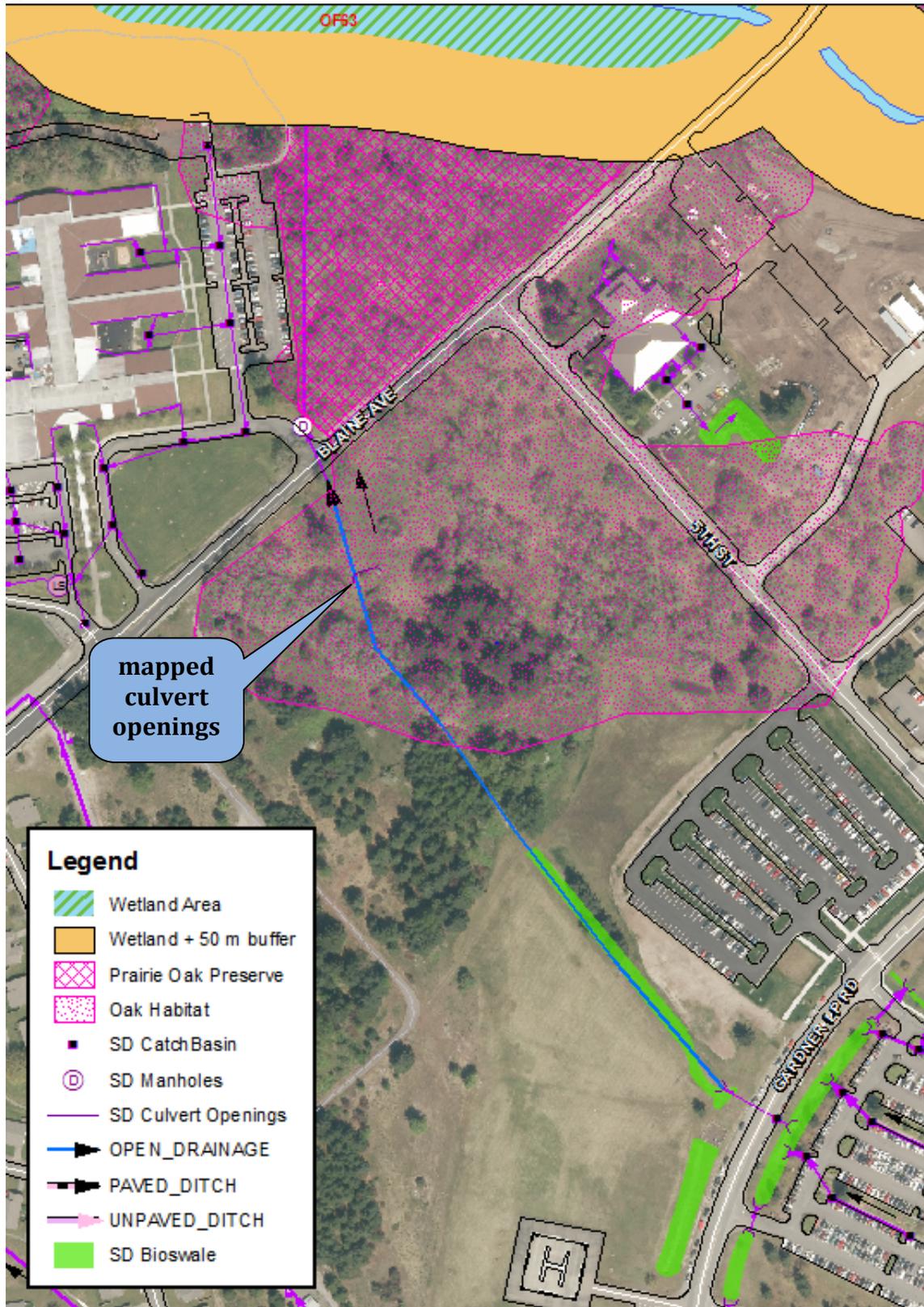
Clearing of the site, including removal of trees and shrubs, and construction activities are anticipated to have a *short-term adverse impact* to water resources due to soil erosion. These impacts are *not expected to be significant* because various temporary erosion control measures will be required, in accordance to State water quality regulations. Though the site is relatively flat, stormwater catch basins and conveyance pipes exist on or near Blaine Ave. Silt fences, catch basin inserts, and/or similar BMPs, will be required to prevent sediment from entering this stormwater system, to avoid impacts to Murray Creek. CPSD will also be required to submit applicable construction drawings and Construction General Stormwater Permit, including Pollution Prevention Plan (SWPPP), prior to conducting any land disturbing activities at the site. The SWPPP would, again, impose BMPs, such as silt fencing around disturbed areas, to prevent erosion (i.e. potentially leading to increased mitigations).

Because of the implementation of such BMPs and the erosion control measures utilized throughout construction, the impacts of the proposed action will not significantly impact water quality within the project vicinity. The proposed action is required to infiltrate on stormwater generated on site and, thus, mimic predevelopment conditions. Due to these actions and the topography of the project site, loss of soils due to erosion is considered discountable. The proposed project will not result in a significant impact to water resources.

NO ACTION ALTERNATIVE

The no action alternative serves as the baseline for this project and would have no impact to water quality.

Figure 4. Areas of Environmental Concern (with Environmental Consequences) within the Project Area



(J. Howard, 2010 Aerial JBLM GIS Database, September 4, 2013)

Recycling and Materials Management

PROPOSED ACTION

The Proposed Action is not expected to result in significant impacts to materials management and recycling efforts at the installation. Although some waste is expected with the implementation of the proposed action, CPSD will implement JBLM's sustainability practices as they relate to reducing, reusing, and recycling resources as they move forward with the proposed project.

To the maximum extent practicable, all soils, trees, and/or other materials that are cleared from the site will be retained and re-used on-site, or taken to JBLM Recycling Center for re-use at a different project location. All timber resources remain the property of the Army, and all removal will be coordinated with JBLM Foresters. If appropriate, JBLM Foresters and Seattle District Corps of Engineers may set up a sale package to harvest the standing timber on site. All activities to remove the timber from the site will occur within the existing JBLM Forest Management Plan (FMP).

NO ACTION ALTERNATIVE

The no action alternative serves as the baseline for this project and would have no impact reduction, reuse, or recycling of materials.

CUMULATIVE EFFECTS DISCUSSION

Cumulative effects address the incremental environment impacts of the proposed action, together with impacts of past, present, and reasonably foreseeable future actions. The cumulative effects address the impacts from projects that may be individually minor, but result in collectively significant impacts when taking into account actions occurring over a period of time.

The proposed action is not expected to have any significant cumulative impacts. Approximately 13 acres of forested and scrub vegetation will be cleared as part of this project. Vegetation and wildlife habitat on JBLM have been impacted in the past, and continue to be impacted due to construction and military training activities. The development represents infill within the urbanized cantonment area of the installation. While its development has some minor cumulative impact, the action is beneficial in that higher quality habitat in the much larger undeveloped training areas of the installation is otherwise preserved.

The proposed action is not expected to cause significant cumulative impacts to biological resources including forested habitats and wildlife because of retained open space within JBLM. The proposed action area is adjacent to land that has already been subject to development and is consistent with past uses and future planning. The location of this site protects the highest quality wildlife habitats from development, and still maintains some natural open spaces in the area.

Mitigation Measures

In addition to those BMPs that were described as part of the proposed action, mitigation measures will be required to offset the projects potential impacts to Oregon white oak species. Although not a factor in reaching insignificance levels, implementation of the project will include replacement of oaks impacted by the proposed action at a ratio of 6:1, where six Oregon white oak trees will be replanted for every white oak impacted by the implantation of the project. Trees will be replanted in clumps, mimicking the growth patterns and habitats that they grow naturally, and scheduled

watering will be included in the monitoring plan until roots have been established to ensure survival.

CONCLUSION

Through evaluation of the direct, indirect, and cumulative impacts that could reasonably be expected to occur as a result of the implementation of the proposed action; it has been found that the development CPSD proposed construction of a new Evergreen Elementary School would not result in significant effects to the environment.

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REFERENCES

32 CFR Part 651 Environmental Analysis of Army Actions

40 CFR § 1500 et seq. Council on Environmental Quality. 1978

AR 200-1 Environmental Protection and Enhancement

Air Installation Compatible Use Zone Study (PRE-FINAL Joint Base Lewis-McChord Master Plan), 6
March 2013

Environmental Noise Assessment No. 52-34-0437-89, Impact of noise on existing and proposed
schools, Fort Lewis, Washington, memorandum (November 1988)

JBLM's Integrated Natural Resources Management Plan, (DRAFT) 9 March 2013

JBLM's Integrated Pest Management Plan for Fort Lewis, 2006

United Facilities Criteria (UFC) 3-260-1 (17 Nov 08), "Airfield and Heliport Planning & Design"

¹ Disclosure statements on file. Contractors have no direct/indirect financial or other interest in the outcome of this project.

DISTRIBUTION LIST

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APPENDIX A

PUBLIC COMMENT AND AGENCY RESPONSE