FINDING OF NO SIGNIFICANT IMPACT:
CONSTRUCTION OF NEW EVERGREEN SCHOOL AT JOINT BASE LEWIS-MCCHORD

Pursuant to the Council on Environmental Quality (CEQ) Regulations (40 CFR [Code of Federal Regulations] Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act (NEPA; 42 United States Code [U.S.C.] 4321 et seq.) and the U.S. Department of Army (Army) Regulation found in 32 CFR Part 651 (Environmental Analysis of Army Actions), the Army has prepared an Environmental Assessment (EA) to review the potential environmental effects that may occur as a result of the Army's agreement to enter into a long-term lease with Clover Park School District (CPSD), and the District's subsequent proposal to construct a new Evergreen Elementary School at the proposed lease site.

Purpose and Need

The purpose of the proposed action is to authorize a lease that will allow Clover Park School District 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. In addition, the current building has ongoing mechanical issues that make it infeasible to remodel.

Proposed Action

The proposed action would construct a new Evergreen Elementary school across from the existing school site. The project would be located off of Blaine Avenue, between 5th and 6th Street, on Lewis Main, Joint Base Lewis-McChord (JBLM). 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, ~104,000 SF)
- Points of ingress/egress (to/from parking lots)
- Bus Lot
- Parent Drop-off Area
- Crosswalks & Sidewalks
- Play Areas (covered, hard, and other)
- Soccer Field
- Vehicle Parking Lot
- Fencing Baseball Field
- Stormwater structures
- School/traffic lights (if necessary)

The design for the proposed facilities will comply with JBLM's Master Plan Guidelines for schools. The orientation of the main building will be directed 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 restrictions. Also, the two-story main school building is expected to comply with height and other restrictions for the nearby Madigan Army Medical Center helicopter approach zone. Construction would likely include improvements on Blaine Avenue such as school/traffic lights and signage.

Alternatives Considered

As prescribed by CEQ regulations, the Army evaluated the No Action Alternative in addition to the Proposed Action. Under the No Action Alternative, the Army would not enter into a lease with CPSD for the use of the parcel located off Blaine Avenue, between 5th and 6th Street. Clover Park School District would continue to operate out of the existing Evergreen Elementary school building and no new construction would occur. The No Action Alternative was not considered a viable alternative to meet the purpose and needs of the proposed action, but is included to represent the project's baseline.

Factors Considered in Determining No Significant Environmental Impacts

The Environmental Assessment, which is attached and incorporated by reference into this Finding of No Significant Impact (FNSI), examined the potential direct, indirect, and cumulative effects of the proposed action on areas of environmental concern, including: biological resources, water resources, and recycling and materials management.

The proposed action will not result in significant impact to biological resources. The proposed construction will clear Oregon white oak trees that are located at the proposed project site. This was considered an adverse impact to the species and its surrounding habitat. These impacts were not considered significant because of the mitigations that have been built into the project. Clover Park School District will mitigate all oaks that are removed at a ratio of 6:1. In addition, all Landmark Oak trees, which are defined as having a single trunk minimum measurement of 24-inches diameter at breast height (30-inches diameter at breast height for multi-trunk trees), will be avoided to the furthest extent possible during project design. The goal is to design the school around these landmark trees, so they can be retained on-site. In addition, the proposed action will remove and dispose invasive species located on-site in a manner consistent with JBLM's Forest Management Plan and in a manner that does not perpetuate the spread of these species. Because of these mitigations and best management practices that have been incorporated into the project, implementation of the proposed action is not expected to result in a significant impact to biological resources.

The proposed action will not result in significant impacts to water resources at JBLM. Short-term adverse impacts may occur as a result of land clearing and construction activities. These impacts are not expected to be significant because of various temporary erosion control measures that 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 Avenue. Silt fences, catch basin inserts, and/or similar BMPs, will be employed to prevent sediment from entering this stormwater system, to avoid impacts to Murray Creek. Clover Park School District

will also be required to obtain a National Pollutant Discharge Elimination Permit, submit applicable construction drawings, and a Stormwater Pollution Prevention Plan as part of the proposed action. The SWPPP would, again, impose BMPs, such as silt fencing around disturbed areas, to prevent erosion.

The proposed action will not 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.

Cumulative Impacts

No adverse cumulative impacts were identified for the proposed action. Approximately 12.2 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. As JBLM grows, mimicking the general growth of the south Puget Sound; lowland forested habitat have been and will continue to be converted into developed lands which impact native flora and fauna communities. Past development, as well foreseeable future industrial and manufacturing uses in the area will also contribute to this changing landscape.

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

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 replace 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.

Public Comment

The Environmental Assessment and draft Finding of No Significant Impact (FNSI) was released for 30-day public review and comment and began on 1 October 2013. A Notice of Availability (NOA) was published in the Tacoma News Tribune and NOA postcards were also mailed out to the Environmental Assessment's Distribution List at this time. Copies of all

documents were/are available on the JBLM Public Works website at http://www.lewis-mcchord.army.mil/publicworks/sites/envir/eia.aspx. The public comment period remained open until 31 October 2013. One letter was received from Washington Department of Ecology (Ecology) during this time frame (see Appendix A for copy of letter and agency response). In their letter, Ecology expressed concern regarding potential for soil or groundwater contamination at the proposed project site. Specifically, their concern was focused on the potential of soil contamination from heavy metals (lead and arsenic) resulting from air emissions originating from the old Asarco smelter in north Tacoma. Ecology correctly pointed out that soil contamination, such as those occurring from the Asarco smelter, poses a risk to human health and the environment. They stated that children are at especially high risk from direct exposure, as well as construction workers, landscapers, gardeners, and others who work and play in the soils.

The Department of Army recognizes Ecology's concern. Analytical results for both arsenic and lead in surface soils at JBLM have measured consistently below Model Toxics Control Act (MTCA) cleanup levels, which are 20 ppm for arsenic and 250 ppm for lead. As an example, and from seven (7) individual studies, only one sample (24 ppm) from 200 samples taken at Lewis Main and McChord Field sites came in above the MTCA cleanup levels for arsenic. For lead, no samples from 25 collected came in above the cleanup level. Statistical calculations using such data from the locations sampled (and in close proximity to the proposed project site), revealed that arsenic levels especially are within the limits of MTCA regulations (i.e. within the 95% Upper Confidence Limit [UCL]). If, at any time, elevated concentrations of lead, arsenic, or other contaminants are identified during soil sampling, the Army will initiate the appropriate actions to meet regulatory requirements, as necessary.

Conclusion

I have considered the results of the analysis referenced above and the Army mission requirements. In review of the resource areas potentially impacted by the proposed action, it was found that the proposed lease agreement, and Clover Park School Districts subsequent proposal to construct a new elementary school at JBLM, would have no significant environmental impacts on the natural or human environment. Based on this documentation, which has incorporated or referenced the best information available, I have taken a hard look at known impacts and determined that the implementation of the proposed action will not significantly affect the environment and therefore, an Environmental Impact Statement is not warranted.

H. Charles Hodges, Jr.
Colonel, IN
Commanding

3 Feb 14

Date